

Navigating the 2024 Uniform Guidance (2 CFR 200) Updates

WIPFLI

1

Presenters



Denes Tobie, CPA
Partner



Ciara Leahy, CPA
Senior Manager

2

Welcome

Thank you for joining us!
We hope today's training meets your expectations.

For further assistance,
please contact us at 888.876.4992
or e-mail us at trainings@wipfli.com.

3

3

No recording of any kind

This includes any
video or audio
images on your
smart devices.



All rights reserved. These materials were created and developed by Wipfli LLP. No part may be reproduced, distributed, or transmitted in any form or by any means, including photocopying, recording, or other electronic or mechanical methods, without the prior written permission of Wipfli LLP, except in the case of brief quotations and certain other noncommercial uses permitted by copyright law. For permission requests, contact Amy Almond at Wipfli LLP.

4

4

Materials

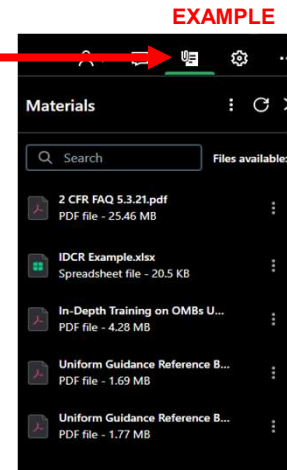
- All materials referenced in this webinar, including the PowerPoint and additional reference materials, are accessible

via the Materials tab (click the icon with the paperclip)

or

the link in your webinar reminder email.

- Materials will be available until one (1) day after the webinar.



5

5

Materials/ disclaimer

- Please note that these materials are incomplete without the accompanying oral comments by the trainer(s).
- These materials are informational and educational in nature and represent the speakers' own views. These materials are for the purchasing agency's use only and not for distribution outside of the agency or publishing on a public website.

6

6

Certificate of Participation and CPE credit



- Each registered person attending the live webinar is eligible to receive a Certificate of Participation / Continuing Professional Education (CPE). *
- To receive a Certificate of Participation / CPE, participants **must answer** the interactive polling questions presented throughout the webinar; participants will have approximately 30 seconds to respond to the questions.
- This session is eligible for 2 CPE credits. There are 3 polling questions per 1 CPE credit. To receive full credit and a certificate of participation, participants must answer all 6 polling questions. To receive partial credit and a certificate, participants must answer at least 3 polling questions. (Effective June 14, 2024)
- Upon receipt, the information will be verified and if accepted, you will receive a Certificate of Participation via e-mail within 14 business days of the webinar presentation. *

7

7

Certificate of Participation and CPE credit (cont.)

*PLEASE NOTE:


- Registration is on a per person basis.
- Certificate of Participation / CPE is only awarded to the registered name associated with the link used to log in.
- You must use your personalized link to access the training to ensure that you qualify for Certificate of Participation / CPE.
- Our team will be monitoring the active attendee list throughout the training event. If a registrant is on the list more than once, the additional logins will be removed.

8

8

July 14 - 18, 2025

STRONGER TO SERVE



Five days of in-person training
Caesars Palace, Las Vegas, Nevada
20+ CPE credits
Connect. Learn. Lead.



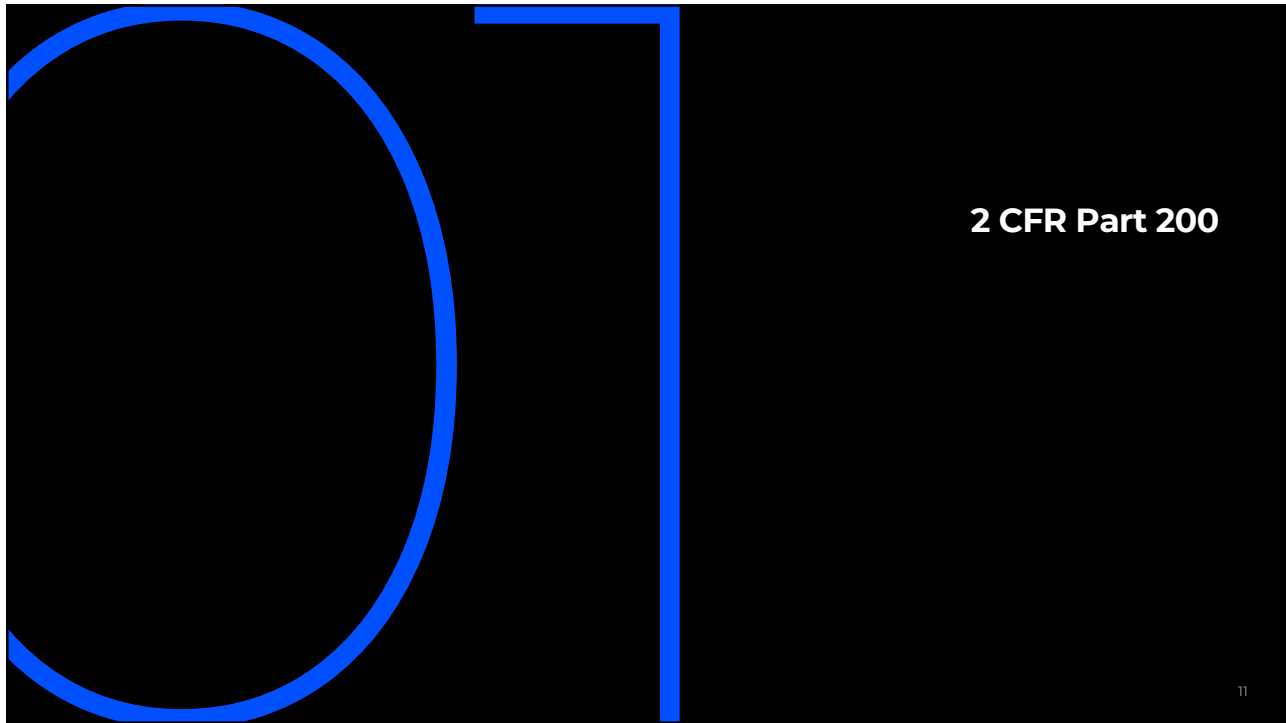
9

Agenda

- 2 CFR Part 200
 - Subpart A – Acronyms & definitions
 - Subpart B – General provisions
 - Subpart C – Pre-Federal award requirements and contents of Federal rewards
 - Subpart D – Post Federal award requirements
 - Subpart E – Cost principles
 - Subpart F – Audit requirements

10


10



11

Uniform Guidance resources

- Notice of Guidance in Federal Register (Comments regarding the Summary and Description of Changes), April 22, 2024
- Full Text of 2 CFR Part 200, OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- Effective Date October 1, 2024 – Federal agencies may elect to apply the final guidance prior, but they are not required (Federal Departments are to get their plan to implement to OMB by May 15, 2024)
- Guidance for Federal Financial Assistance includes 2 CFR Parts 1, 25, 170, 175, 180, 182, 183, 184, and 200



12

OMB's why's

1. Incorporate statutory requirements and administration priorities
 2. Reduce agency and recipient burden
 3. Clarifying certain sections of the prior version that recipients and agencies have interpreted in different ways
 4. Use plain language, improve flow and address inconsistent use of terms
- Revisions are intended to improve Federal Financial assistance management, transparency, and oversight through more accessible and readily comprehensible guidance

13

Revisions to UG support these 4 objectives

1. Incorporating statutory requirements and administration priorities—**OMB made changes throughout the Uniform Guidance (UG) to ensure consistency with statutory authorities.**

14

Revisions to UG support these 4 objectives

2. Reducing agency and recipient burden—OMB increased several monetary thresholds that have not been updated for many years. OMB reviewed previous increases to the thresholds and considered current economic data in making these determinations. In further support of reducing burden, OMB provided a complete revision to the template text for a Notice of Funding Opportunity (NOFO) located in Appendix I of the Uniform Guidance. With this revision, OMB intends to reduce administrative burden and unnecessary obstacles to applying for Federal financial assistance.

15

Revisions to UG support these 4 objectives

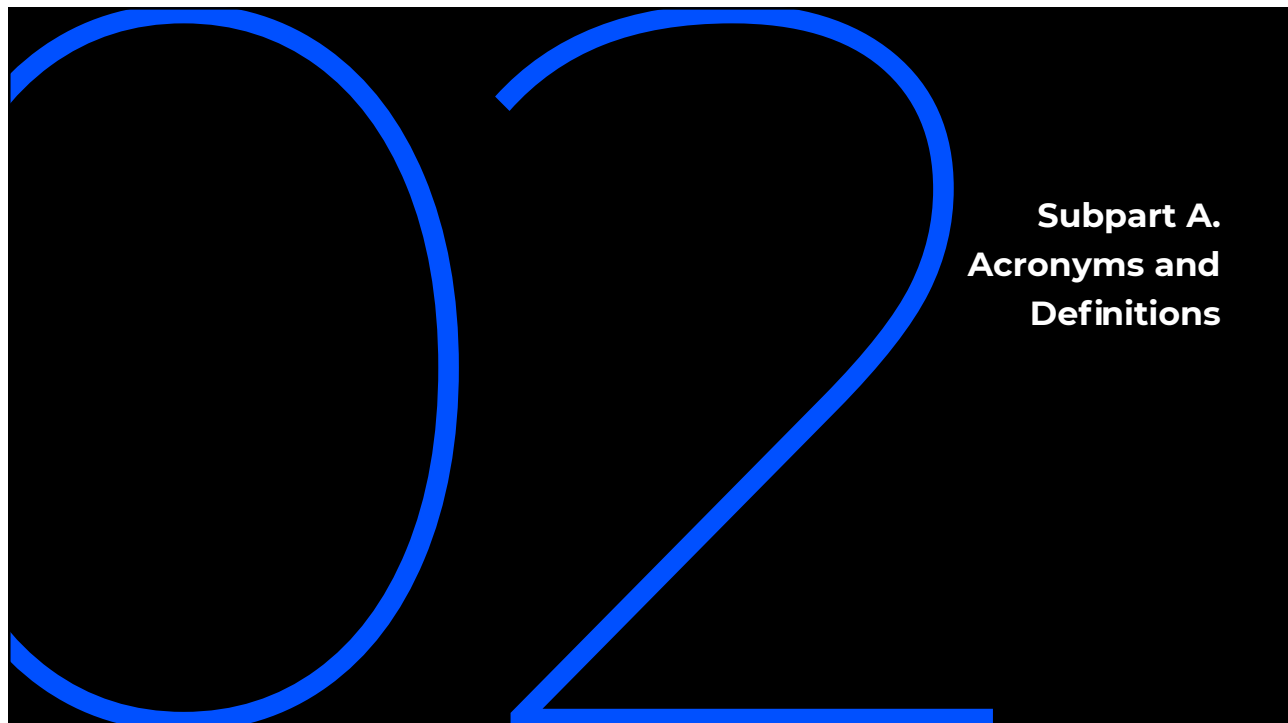
3. Clarifying sections that recipients or agencies have interpreted in different ways—OMB made revisions to 2 CFR to clarify areas of misinterpretation. **Many of these clarifications do not represent a change in policy but are intended to eliminate ambiguity and clarify the intent of specific sections of the Uniform Guidance.**

16

**Revisions to
UG support
these 4
objectives**

- 4. Rewriting applicable sections in plain language**, improving flow, and addressing inconsistent use of terms—OMB revised the guidance to better follow plain language principles. OMB focused on using simple words and phrases, avoiding jargon, using terms consistently, and being concise.
- OMB replaced “recipient or subrecipient” with “recipient and subrecipient” throughout UG
 - OMB replaced “OMB designated governmentwide systems” with the specific reference (i.e., sam.gov, USASpending.gov, and Grants.gov)

17



18

Subpart A. Acronyms & definitions

§200.0 Acronyms

- Removed 18 and added
 - FASB - Financial Accounting Standards Board
 - GASB – Government Accounting Standards Board
 - NOFO – Notice of Funding Opportunity
 - UEI – Unique Entity Number

19



19

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ Cognizant Agency for Audit - [Federal Agency Single Audit contacts](#) listed on FAC website ([update](#))
- ▶ Continuation Funding - means the second or subsequent budget period within an identified period of performance ([new](#))
- ▶ Contract - clarified includes all procurement transactions ([update](#))
- ▶ Equipment - Raised threshold to [\\$10,000](#) ([update](#))
- ▶ Federal Agency – “The term generally refers to the agency that provides a Federal award directly to a recipient.” ([update](#))

© 2024 Wipfli LLP. All rights reserved.

20

20

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ **For-profit Organization** - Generally means an organization or entity organized for the purpose of earning a profit. Examples listed. ([new](#))
- ▶ **Grant Agreement or Grant** - Added or Grant to the title ([update](#))
- ▶ **Improper Payment** - A payment that should not have been made or that was made in an incorrect amount under statutory, contractual, administrative, or other legally applicable requirements. Significantly shortened the old definition. ([update](#))

© 2024 Wipfli LLP. All rights reserved.

21

21

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ **Indirect Costs** - Removed (F&A) in the title and definition ([update](#))
- ▶ **Intangible Property** - Expanded definition includes items such as trademarks, copyrights, data (including data licenses), websites, IP licenses, trade secrets, patents, patent applications, lease agreements, stocks, intellectual property, software or software subscriptions or licenses. ([update](#))
- ▶ **Loan** - Added or subrecipients ([update](#))

© 2024 Wipfli LLP. All rights reserved.

22

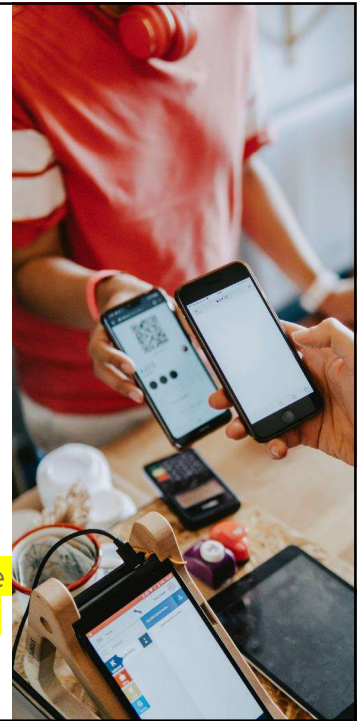
22

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ **Micro-purchase** – Means an individual procurement transaction for supplies or services, the aggregate amount of which does not exceed the micro-purchase threshold. (update)
- ▶ **Modified Total Direct Cost (MTDC)** - Raised amount claimed on subawards to \$50,000. (update)
Emphasized that is only for the first year regardless of the period of performance of the subawards under the award.

© 2024 Wipfii LLP. All rights reserved.



23

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ **Notice of Funding Opportunity** – Minor wording (update)
- ▶ **Participant** - Means an individual participating in or attending program activities under a Federal award, such as trainings or conferences, but who is not responsible for implementation of the Federal award. Provides examples. (new)
- ▶ **Participant Support Costs** - Direct costs that support the participants and their involvement in a Federal award, such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid directly to or on behalf of participants. (update)

© 2024 Wipfii LLP. All rights reserved.

24

24

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ Pass-through Entity – A recipient or subrecipient that provides a subaward to a subrecipient (including lower tier subrecipients) to carry out part of a Federal program. The authority of the pass-through entity under this part flows through the subaward agreement between the pass-through entity and subrecipient. (update)
- ▶ Period of Performance - Means the time interval between the start and end date of a Federal award. (minor update)
- ▶ Personally Identifiable Information (PII) - Removed Public PII as it wasn't used. PII can be available in public sources. (update)

© 2024 Wipfli LLP. All rights reserved.

25

25

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ Prior approval – “obtained in advance” but acknowledges that “Federal agencies may exercise reasonable discretion in providing “after the fact” prior approval when warranted on a case-by-case basis.” (new)

© 2024 Wipfli LLP. All rights reserved.



26

Subpart A. Acronyms & Definitions

§200.1 - Definitions

Questioned Cost –

- (1) Questioned cost means an amount, expended or received from a Federal award, that in the auditor's judgment:
 - ▶ (i) Is noncompliant or suspected noncompliant with Federal statutes, regulations, or the terms and conditions of the Federal award;
 - ▶ (ii) At the time of the audit, lacked adequate documentation to support compliance; or
 - ▶ (iii) Appeared unreasonable and did not reflect the actions a prudent person would take in the circumstances.

© 2024 Wipfli LLP. All rights reserved.

27

27

Subpart A. Acronyms & Definitions

§200.1 - Definitions

Questioned Cost –

- (2) The questioned cost amount under (1)(ii) is calculated as if the portion of a transaction that lacked adequate documentation were confirmed noncompliant.
- (3) There is no questioned cost solely because of:
 - ▶ (i) Deficiencies in internal control; or
 - ▶ (ii) Noncompliance with the reporting type of compliance requirement if this noncompliance does not affect the amount expended or received from the Federal award.

© 2024 Wipfli LLP. All rights reserved.

28

28

Subpart A. Acronyms & Definitions

§200.1 - Definitions

Questioned Cost –

- (4) Known questioned cost means a questioned cost specifically identified by the auditor. Known questioned costs are a subset of likely questioned costs.
- (5) Likely questioned cost means the auditor's best estimate of total questioned costs, not just the known questioned costs. Likely questioned costs are developed by extrapolating from audit evidence obtained.
- (6) Questioned costs are not improper payments until reviewed and confirmed to be improper payments as defined in OMB Circular A-123"

© 2024 Wipfli LLP. All rights reserved.

29

29

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ Renewal award – A Federal award for which the start date is contiguous with, or closely follows, the end of the expiring Federal award. The start date of a renewal award begins a new and distinct period of performance. (rewording)

© 2024 Wipfli LLP. All rights reserved.



30

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ **Subaward** – An award provided by a pass-through entity to a subrecipient for the subrecipient **to contribute to the goals and objectives of the project by carrying** out part of a Federal award received by the pass-through entity. It does not include payments to a contractor, beneficiary, or **participant**. A subaward may be provided through any form of legal agreement, including an agreement the pass-through entity considers a contract. (update)
- ▶ **Subrecipient** – Does not include a beneficiary or **participant**. (update)

© 2024 Wipfli LLP. All rights reserved.

31

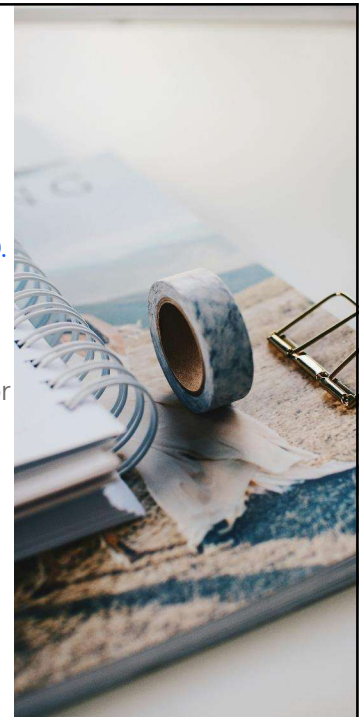
31

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ **Supply** – Raised threshold up to **\$10,000**. (update)
- ▶ **Termination** – The action a Federal agency or pass-through entity takes to discontinue a Federal award, in whole or in part, at any time before the planned end date of the period of performance. **Termination does not include discontinuing a Federal award due to a lack of available funds.** (update)

© 2024 Wipfli LLP. All rights reserved.



32

Subpart A. Acronyms & Definitions

§200.1 - Definitions

- ▶ **Unliquidated Financial Obligation** – Financial obligations incurred by the recipient or subrecipient but not paid (liquidated) for financial reports prepared on a cash basis. For reports prepared on an accrual basis, these are financial obligations incurred by the recipient or subrecipient but for which expenditures have not been recorded. (rewording)

© 2024 Wipfli LLP. All rights reserved.



33



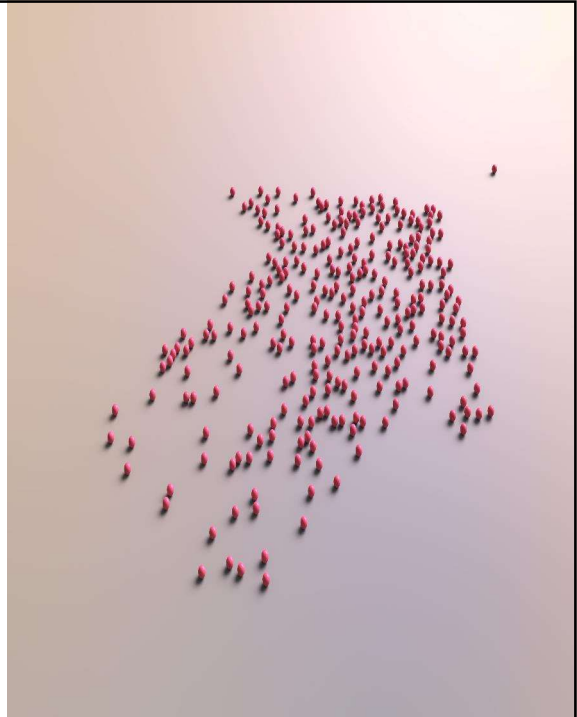
Subpart B. General Provisions

34

Subpart B. General provisions

§200.100 Purpose

- Simplified the section and minor changes, but not the intent.

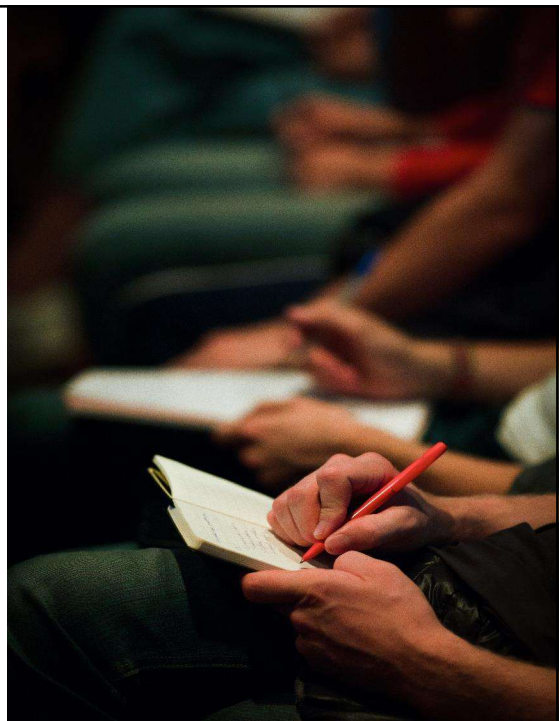


35

Subpart B. General provisions

§200.101 Applicability

- Changes the table to a narrative approach. Clarified when UG and which parts apply to different ^{TLO} awards.



36

Slide 36

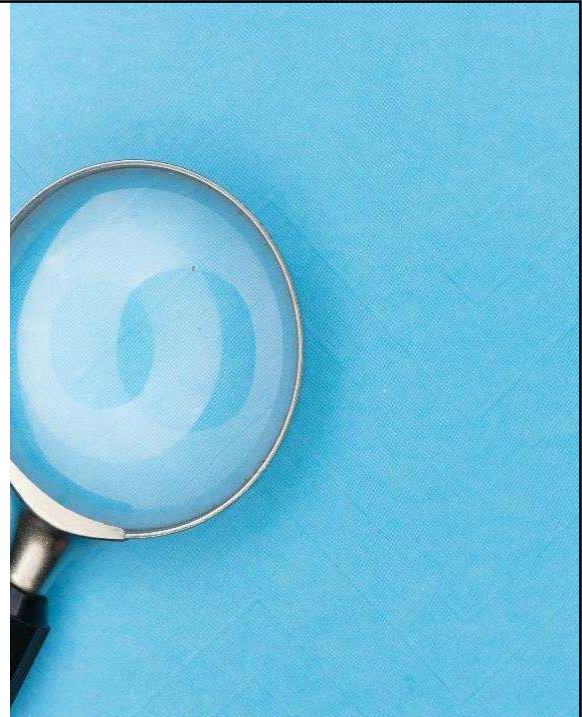
TLO This sentence is a bit confusing.
LeSage, Teri, 2024-06-21T18:13:25.945

Subpart B. General Provisions

§200.109 Review Date

- **UPDATE** OMB will review this part periodically. (*removed every 5 years*)

37



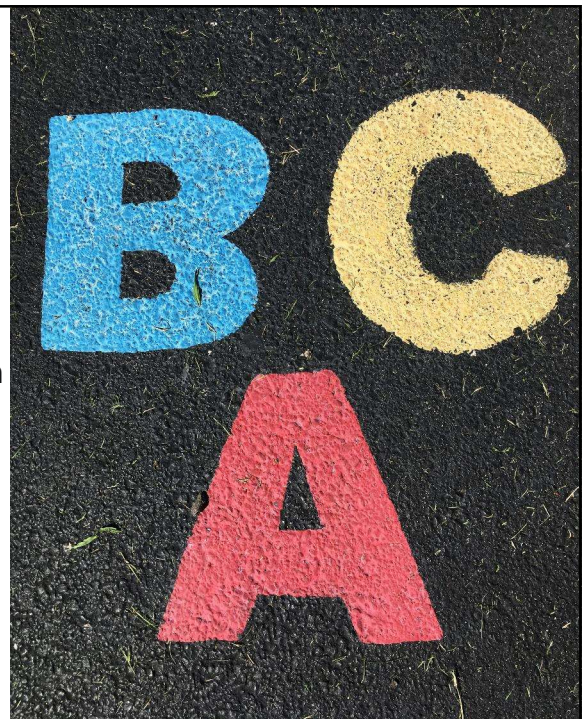
37

Subpart B. General provisions

§200.111 English Language

Changed must to should

(a) All Federal financial assistance announcements, applications, and Federal award information should be in the English language and must be in terms of U.S. dollars. However, Federal agencies, recipients, and subrecipients may issue or translate a Federal award or other documents into another language.



38

Subpart B. General Provisions

Changes:

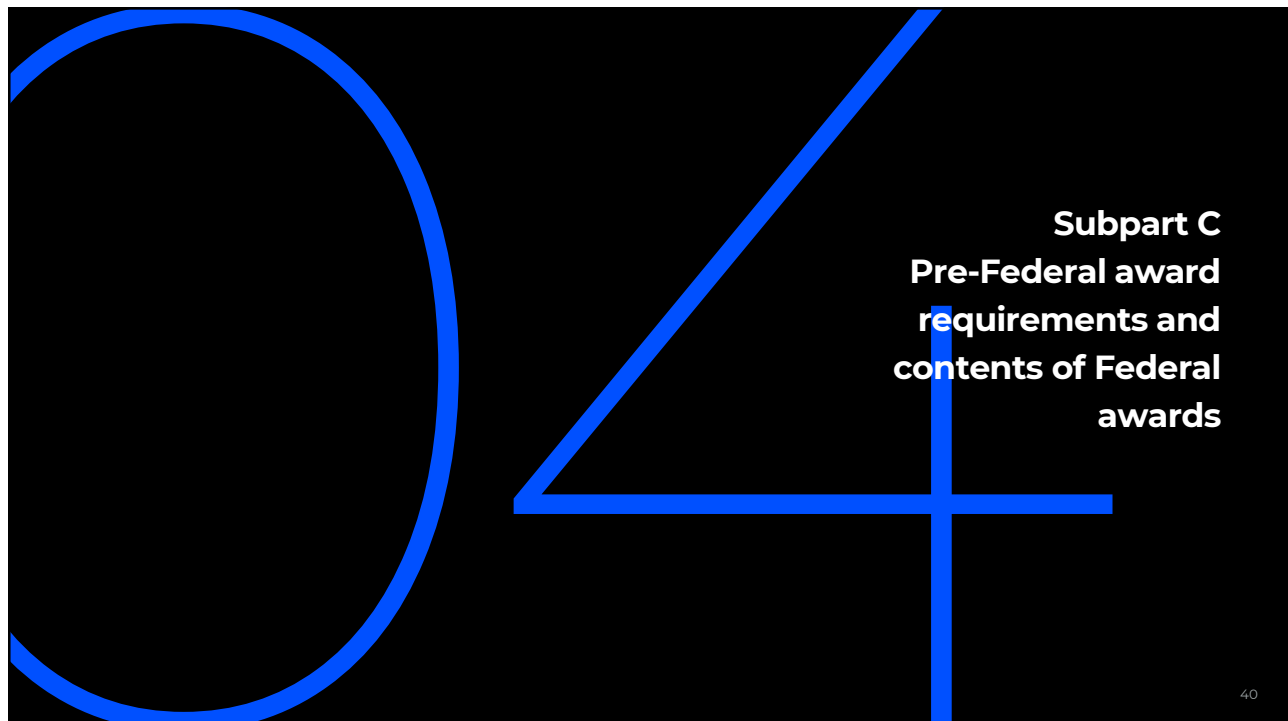
- Added 'promptly'
- Added 'credible evidence'
- Added 'conflicts of interest'
- Added informing
OIG

39

§200.113 Mandatory Disclosures

UPDATE An applicant, recipient, or subrecipient of a Federal award must **promptly** disclose whenever, in connection with the Federal award (including any activities or subawards thereunder), it has **credible evidence** of the commission of a violation of Federal criminal law involving fraud, **conflict of interest**, bribery, or gratuity violations. **The disclosure must be made in writing to the Federal agency, the agency's Office of Inspector General, and pass-through entity (if applicable).**

39



40

**Subpart C.
Pre-Federal
award**

§200.201 Use of grant agreements

- (b) Fixed Amount Awards
 - (1) Payments based on meeting specific requirements. Accountability is based on [performance and results](#)
 - **No expected routine monitoring, therefore, no financial reporting is required, record retention is required as is making records available for review during audit**
 - **May be awarded if the project scope is specific and if adequate cost data is available**
 - (2) Cannot be used in programs that require match
 - (3) Can generate program income but applications of program income don't apply

41

41

**Subpart C.
Pre-Federal
award**

§200.206 Federal agency review of risk posed by applicants

(b)(2) Risk [Assessment](#) – in evaluated risks posed by applicants, the Federal agency [should](#) consider the following items:

Changes:

- *Changed title*
- *Changed from may to should*

- Financial stability
- Management systems and standards
- History of performance
- Audit reports and findings
- Ability to effectively implement requirements

42

42

**Subpart C.
Pre-Federal
award**

**§200.206 Federal agency review of risk posed
by applicants**

UPDATE (c) *Adjustments to the Risk Assessment.* The Federal agency may modify the risk assessment at any time during the period of performance, which may justify changes to the terms and conditions of the Federal award.

43

43

**Subpart C.
Pre-Federal
award**

§200.211 Information contained in a Federal award

Changes:

- *Minor rewording*

- (a) Performance goals
 - Performance goals, indicators, targets and baseline data must be included, where applicable

44

44

Subpart C. Pre-Federal award

Changes:

- *Minor rewording*

§200.211 Information contained in a Federal award

(c) General terms and conditions

- (iv) *Future budget periods.* **When** it is anticipated that the period of performance will include multiple budget periods, the Federal agency must indicate that subsequent budget periods are subject to the availability of funds, program authority, satisfactory performance, and compliance with the terms and conditions of the Federal award.
- (v) *Termination provisions.* Federal agencies must **inform** recipients of the termination provisions.

45

45

Subpart C. Pre-Federal award

§200.217 Whistleblower protections

(**New**) An employee of a recipient or subrecipient must not be **discharged, demoted, or otherwise discriminated against** as a reprisal for disclosing information that the employee reasonably believes is evidence of **gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority** relating to a Federal contract or grant, a substantial and specific **danger to public health or safety**, or a **violation** of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant. The recipient and subrecipient must inform their employees **in writing** of employee whistleblower rights and protections.

46

46



47

<p>Subpart D. Post-Federal award requirements</p>	<p>§200.300 Statutory and national policy requirements</p>
	<p>(New) (b) In administering Federal awards that are subject to a Federal statute prohibiting discrimination based on sex, the Federal agency or pass-through entity must ensure that the award is administered in a way that does not unlawfully discriminate based on sexual orientation or gender identity if the statute's prohibition on sex discrimination encompasses discrimination based on sexual orientation and gender identity consistent with the Supreme Court's reasoning in <i>Bostock v. Clayton County</i>.</p>

48

**Subpart D.
Post-Federal
award
requirements**

§200.301 Performance Measurement

- (a) Federal agency must
 - Measure recipient's performance to show achievement of program goals and objectives
 - Share lessons learned
 - Improve program outcomes, and
 - Foster adoption of promising practices
- Should establish program goals and objectives during planning and design (§200.202)
- Should clearly communicate expected outcomes (such as outputs, service performance, or public impacts of any of these) indicators, targets, baseline data, or data collections that the recipient is responsible for measuring and reporting

49

49

**Subpart D.
Post-Federal
award
requirements**

Changes:

- *Minor rewording*

§200.302 Financial Management

(b) Recipient's and subrecipient's financial management system must:

1. **Identify** funds received and expended and the Federal programs under which they were received
2. **Disclose** accurate, current and complete financial results
3. Maintain **records** that identify amount, source and expenditure of Federal funds
4. Provide effective **control** over and accountability for all funds, property and assets
5. **Compare** budget to actual results for each Federal award
6. Provide for written procedures for **payment requirements**
7. Provide for written procedures for determining **allowability of costs**

50

50

Subpart D. Post-Federal award requirements

Changes:

- Added 'document'
- Changed from 'should be in compliance' to 'align'

51

§200.303 Internal controls

Recipient and subrecipient **must**:

- (a) Establish, **document**, and maintain effective internal control over the Federal award that provides **reasonable assurance** that the recipient or subrecipient is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award.
 - Internal controls should **align** with the guidance the Committee of Sponsoring Organizations of the Treadway Commission (COSO) or the Green Book

51

Subpart D. Post-Federal award requirements

§200.303 Internal controls (cont)

Recipient and subrecipient **must**: (cont.)

- (c) Evaluate and monitor compliance with statutes, regulations and the terms and conditions of the award
- (e) Take reasonable **cybersecurity** and other measures to safeguard information including protected personally identifiable information (PII) and other types of information. This also includes information the Federal agency or pass-through entity designates as sensitive or other information the recipient or subrecipient considers sensitive and is consistent with applicable Federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality.

52



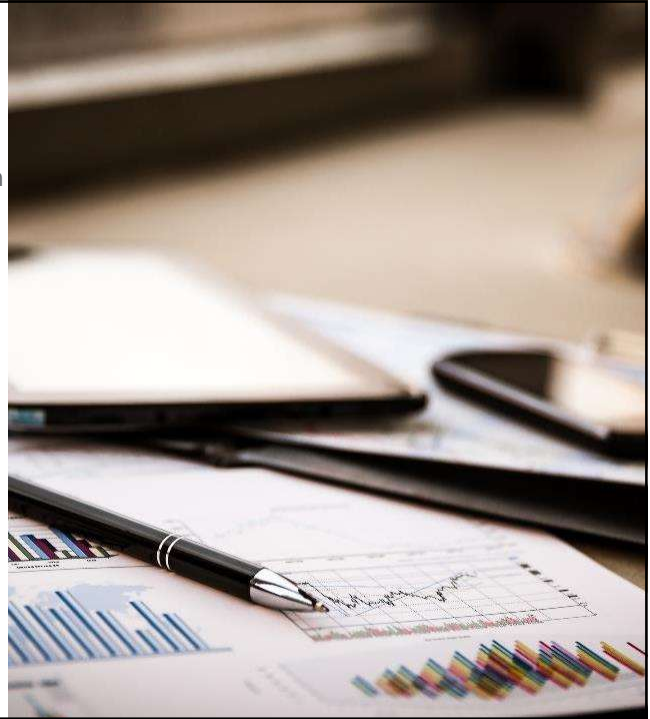
52

Subpart D. Post-Federal award requirements

§200.305 Federal payment

- (b) Minimize the time elapsing between the transfer of funds from the awarding agency and the disbursement of funds regardless of whether the payment is made by electronic funds transfer or other means.
 - (5) If available, the recipient or subrecipient must disburse funds available from program income, rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments

53



53

Subpart D. Post-Federal award requirements

§200.305 Federal payment (cont)

(b) (10)) Advance payments of Federal funds must be deposited and maintained in insured accounts **whenever possible**.

(b) (11) Must maintain advance payments in interest-bearing accounts unless:

- (i) Receive less than \$250,000 of Federal funds annually
- (ii) Best available account would not earn \$500 annually

54

54

**Subpart D.
Post-Federal
award
requirements**

§200.305 Federal payment (cont)

(b) (12) Recipient or subrecipient may retain up to \$500 of interest earned per year. Any additional interest earned must be returned annually.

- Returned annually to DHHS PMS through either ACH or Fedwire Funds Service payment.

(b) (13) All other Federal funds must be returned to the payment system of the Federal agency.

55

55

**Subpart D.
Post-Federal
award
requirements**

§200.306(b) Cost sharing

1. Verifiable from the recipient or subrecipient's records
2. Not included as a cost or match to any other Federally-funded program
3. Necessary and reasonable for achieving the objectives of the Federal award
4. Allowable under Subpart E
5. Not paid by Federal Government under another Federal award program, unless authorized by Federal statute
6. Provided for in the approved budget
7. Conform to other applicable provisions of this part

Changes:

- Title change – removed 'or matching'
- 'accomplishing' changed to 'achieving'
- Slight rewording

56

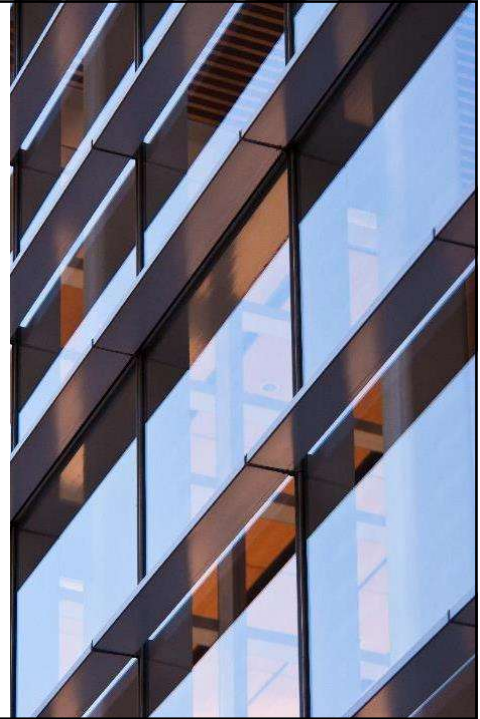
56

Subpart D. Post-Federal award requirements

§200.306 Cost sharing (cont.)

- (i) Value of donated property:
 - (1) Must use an **independent certified appraiser** value donated land and buildings
 - (3) Must use an **independent appraiser to value** donated space
- (j) The fair market value of third-party in-kind contributions must be documented

57



57

Subpart D. Post-Federal award requirements

Changes:

- *Section included a lot of rewording for clarity*
- *Added (c)*

§200.307 Program Income

- (c) Income earned after the period of performance there are no requirements unless stipulated in the terms and conditions of the award or may be negotiated.

58

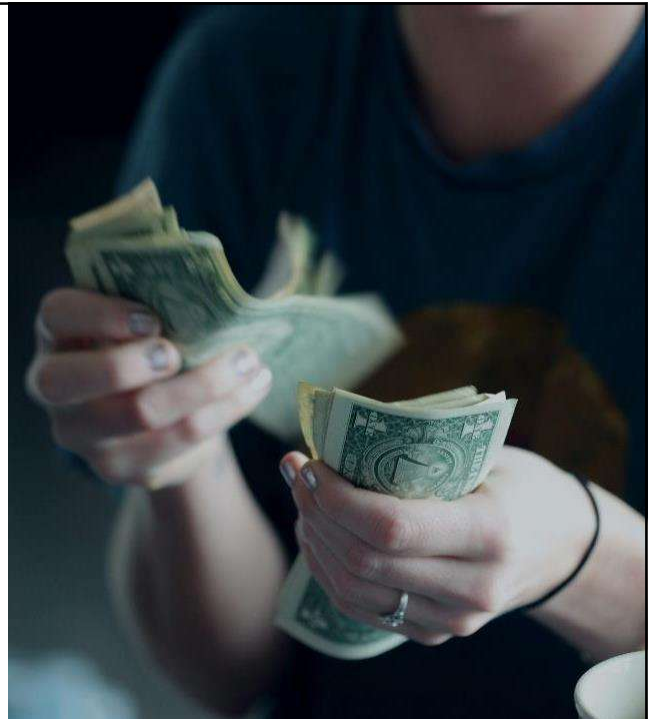
58

Subpart D. Post-Federal award requirements

§200.307 Program Income

- (d) Costs of generating program income. If authorized by Federal regulations, cost incidental to generating program income may be deducted from gross income to determine program income provided they were not charged to the award.
- (e) Not considered program income – government revenue, sale of property, equipment, or supplies, and license fees and royalties

59



59

Subpart D. Post-Federal award requirements

Changes:

- *Updates to #2*
- *Minor rewording for clarification*
- *Added #9*

60

§200.308 Revision of budget and program plans

- (f) Revisions requiring prior approval include:
 - (1) Change in scope or objective
 - (2) Change in key **personnel (including employees and contractors) that are identified by name or position** in the Federal award
 - (3) Disengagement of project leader for more than 3 months or a 25% reduction in time
 - (4) Costs requiring prior approval in Subpart E
 - (5) Transfer of funds for participant support costs
 - (6) **Subaward activities not proposed in the application and approved in the award**
 - (7) Changes in the **total** approved cost-sharing amount
 - (8) Need for additional Federal funding
 - (9) **(new) Transferring funds between construction and non constructions work**

60

Subpart D. Post-Federal award requirements

Changes:

- Added #10

§200.308 Revision of budget and program plans

- (f) Prior approval required for:
 - (10) (new) A no-cost extension (meaning, an extension of time that does not require the obligation of additional Federal funds) of the period of performance, other than any one-time extension authorized by the Federal agency in accordance with paragraph (g)(2). All requests for no-cost extensions should be submitted at least 10 calendar days before the conclusion of the period of performance. The Federal agency may approve multiple no-cost extensions under a Federal award if not prohibited by Federal statute or regulation.

61

61



62

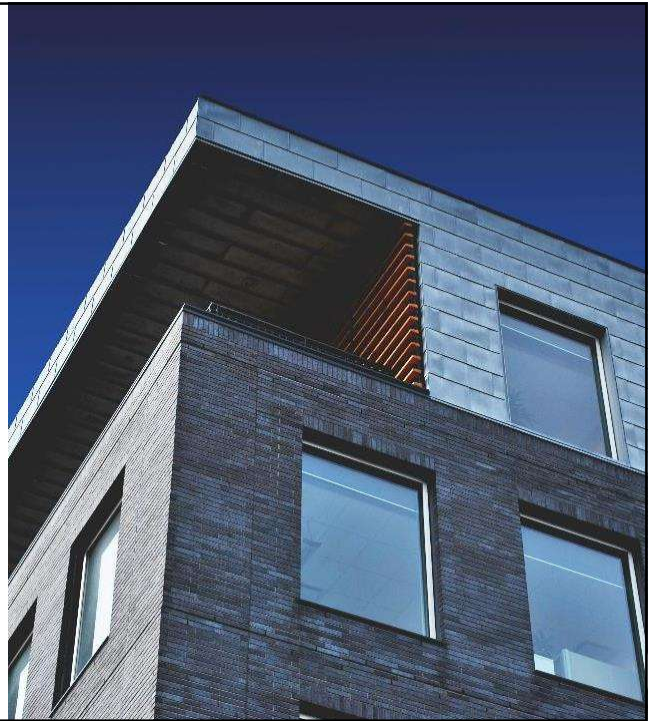
Subpart D. Post-Federal award requirements

§200.311 Real Property

(a) Title vests in the recipient or subrecipient

(c) When an appraisal is required, it must be conducted by an independent appraiser (certified real property appraiser)

63



63

§200.313 Equipment

Subpart D. Post-Federal award requirements

Changes:

- *Threshold increase to \$10,000*
- *Rewording for clarification*

- (a) Conditional title vests in the recipient or subrecipient – **updated to \$10,000**. Title for equipment is subject to the following conditions:
 - (1) Use for authorized purposes during the period of performance until no longer needed for the project
 - (2) Recipient or subrecipient **must not dispose** or encumber without approval of the Federal agency or pass-through entity

64

64

Subpart D. Post-Federal award requirements

Changes:

- *Threshold increase to \$10,000*
- *Threshold increase to \$1,000*
- *Minor rewording for clarification*
- *Added (f)*

65

§200.313 Equipment (cont.)

- (e) Disposition
 - (1) **Current FMV \$10,000 (per unit)** or less may be retained, sold or otherwise disposed of with no further **responsibility** to the **Federal agency or pass-through entity**
 - (2) FMV greater than **\$10,000 (per unit)**:
 - No response in 120 days, may keep or sell but must pay Federal agency its share of proceeds of FMV
 - Recipient or subrecipient may keep **\$1,000** of proceeds
- (f) **Equipment retention**. When included in the terms and conditions of the award, the Federal agency may permit the recipient to retain equipment or authorize a pass-through entity to permit the subrecipient to retain equipment, with no further obligation to the Federal Government unless prohibited by Federal statute or regulation.

65

Subpart D. Post-Federal award requirements

Changes:

- *Threshold increase to \$10,000*
- *Threshold increase to \$1,000*
- *Minor rewording for clarification*

66

§200.314 Supplies

(a) Supplies includes computing devices costing less than **\$10,000**. When there is a residual inventory of unused supplies **exceeding \$10,000 in aggregate value** at the end of the period of performance, and the supplies are not needed for any other Federal award, the recipient or subrecipient may retain or sell the unused supplies.

- **Unused supplies means supplies that are in new condition, not having been used or opened before. The aggregate value of unused supplies consists of all supply types, not just like item supplies.**
- If the supplies are sold, the Federal agency or pass-through entity may permit the recipient or subrecipient to retain, **\$1,000 of the proceeds to cover** expenses associated with the selling and handling of the supplies.

66

**Subpart D.
Post-Federal
award
requirements**

Changes:

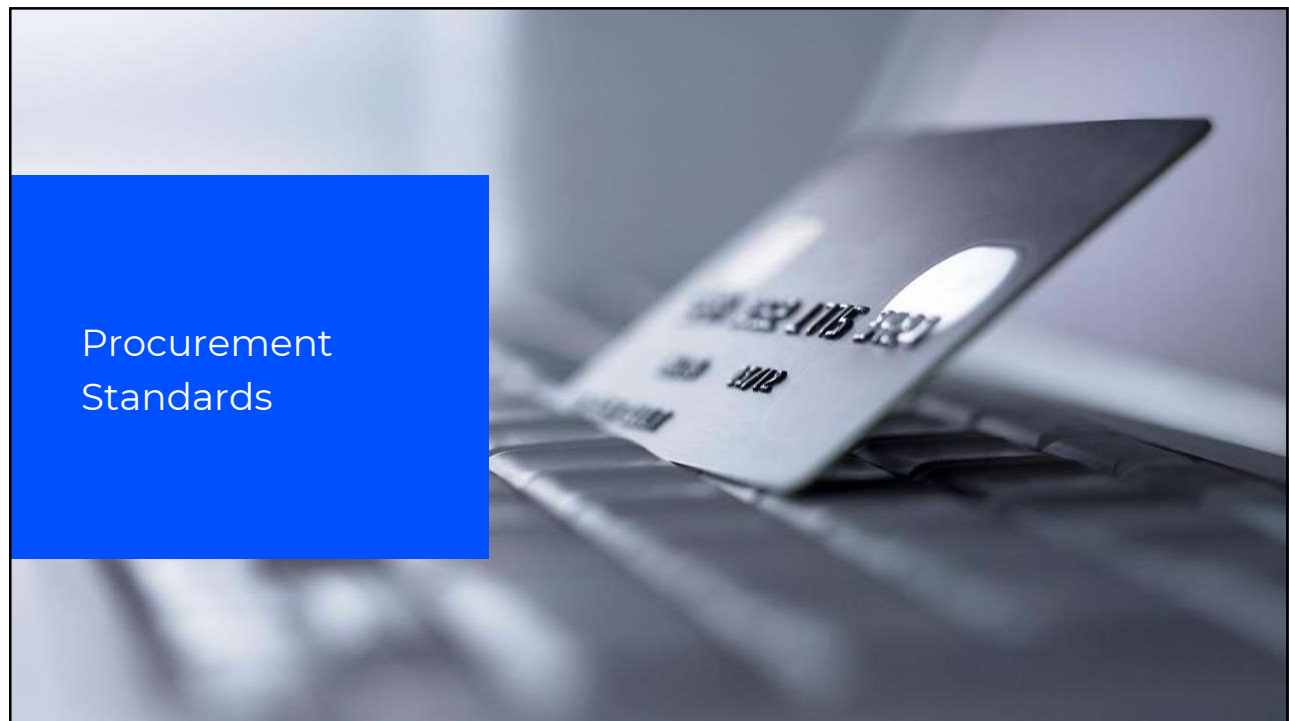
- *Minor rewording for clarification*
- *Added (f)*

§200.315 Intangible Property

- (d) The Federal Government has the right to: (1) Obtain, reproduce, publish, or otherwise use the data produced under a Federal award; and (2) Authorize others to receive, reproduce, publish, or otherwise use the data for Federal purposes.
- (f) Federal agencies should work with recipients to maximize public access to Federally funded research results and data in a manner that protects data providers' confidentiality, privacy, and security. Agencies should provide guidance to recipients to make restricted-access data available through a variety of mechanisms.

67

67



68

**Subpart D.
Post-Federal
award
requirements**

§200.318 General procurement standards

- (a) Must **maintain and use** documented procurement procedures consistent with state, local, and tribal laws and regulations
 - Documented procurement procedures must conform to procurement standards
- (c)(1) Must maintain written standards of conduct covering real or apparent conflicts of interest in the selection, award, or administration of a contract
 - Employee, officer, agent or **board member**
 - Members of their immediate families, partners, or employers
 - Organization that employs or is about to employ them

69

69

**Subpart D.
Post-Federal
award
requirements**

§200.318 (c)(1) (cont.)

Changes:

- *Conflict of interest – added board members*

- An employee, officer, agent **or board member** must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors
- May set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value (must be defined)
- Written policies must include disciplinary actions for violations

70

70

**Subpart D.
Post-Federal
award
requirements**

Changes:

- *Minor rewording for clarification*
- *Removed no geographic preference*

§200.319 Competition

- (a) Full and open competition
- (b) Contractors that develop or draft specifications, requirements, statements of work or invitations for bids are excluded from bidding
- (d) Must have written procedures; name brands used only as a description
- (e) Pre-qualified contractors: Must ensure lists are current and include enough qualified sources to ensure competition. **When establishing or amending prequalified lists, the recipient or subrecipient must consider objective factors that evaluate price and cost to maximize competition.**

71

71

**Subpart D.
Post-Federal
award
requirements**

Changes:

- *Added (f)*

§200.319 Competition

- (f) Does not prohibit recipients or subrecipients from developing written procedures for procurement transactions that incorporate a scoring mechanism that rewards bidders that commit to specific numbers and types of U.S. jobs, minimum compensation, benefits, on-the-job-training for employees making work products or providing services on a contract, and other worker protections. Also does not prohibit recipients and subrecipients from making inquiries of bidders about these subjects and assessing the responses.

72

72

Subpart D. Post-Federal award requirements

§200.320 Procurement Methods

(a) Informal Procurement Methods for Small Purchases	(b) Formal Procurement Method	(c) Noncompetitive
<ul style="list-style-type: none">▪ Up to the simplified acquisition threshold▪ See definition section▪ or a lower threshold established by the recipient or subrecipient▪ Expedite the completion of transactions, minimize the administrative burden and reduce costs	<ul style="list-style-type: none">▪ Over the simplified acquisition threshold<ul style="list-style-type: none">▪ or a lower threshold established by the recipient or subrecipient▪ Follow documented procedures▪ Public advertising	<ul style="list-style-type: none">▪ Specific circumstances▪ 1 or more apply

73

73

Subpart D. Post-Federal award requirements

Changes:

- *Title change*
- *Term from small purchases to simplified acquisitions*

§200.320 Procurement Methods

(a) Informal Procurement Methods for Small Purchases	(b) Formal Procurement Methods	(c) Noncompetitive Procurement Methods
<ul style="list-style-type: none">▪ Micro Purchase▪ Simplified Acquisitions	<ul style="list-style-type: none">▪ Sealed Bid▪ Proposal	<ul style="list-style-type: none">▪ Sole Source

74

74

**Subpart D.
Post-Federal
award
requirements**

Changes:

- *Minor rewording for clarification*

§200.320 Procurement Methods

- (a) Informal procurement methods for small purchases
 - (1) Micro-purchases
 - (i) The aggregate amount of the procurement transaction does not exceed the micro-purchase threshold. Distribution - To the maximum extent practicable, Recipient and subrecipient should distribute equitably among qualified suppliers
 - (ii) Awards - May be awarded without competitive quotes if price is considered reasonable based on research, experience, purchase history, or other information and maintains documents to support its conclusion

75

75

**Subpart D.
Post-Federal
award
requirements**

§200.320 Procurement Methods

(a)(1) Informal procurement methods for small purchases, Micro-purchase (cont.) (iii) – (v)
Thresholds

- The recipient and subrecipient are responsible for determining and documenting appropriate micro-purchase threshold based on
 - Internal controls, evaluation of risk, documented procurement procedures

76

76

Subpart D. Post-Federal award requirements

§200.320 Methods of procurement to be followed

(a) Informal procurement methods for small purchases (cont)

(2) Simplified acquisitions

(i) Procedures – Price or rate quote must be obtained from adequate number of qualified sources, as determined by the recipient or subrecipient

(ii) Threshold – Recipient or subrecipient is responsible for determining based on internal controls, evaluation of risk and documented procurement procedures. Must not exceed SAT threshold established by 48 CFR 2.1

77



77

Subpart D. Post-Federal award requirements

§200.321 Contracting with small businesses, minority businesses, women's business enterprises, veteran-owned businesses and labor surplus area firms.

- (a) When possible, should ensure that small businesses, minority businesses, women's business enterprises, veteran-owned businesses and labor surplus area firms are considered

78



78

§200.321 Contracting with small businesses, minority businesses, women’s business enterprises, veteran-owned businesses and labor surplus area firms.

Subpart D. Post-Federal award requirements

- (b) Consideration means:
 1. These business types are included on solicitation lists;
 2. These business types are solicited whenever they are deemed eligible as potential sources;
 3. Dividing procurement transactions into separate procurements to permit maximum participation by these business types;
 4. Establishing delivery schedules that encourage participation by these business types;
 5. Utilizing organizations such as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
 6. Requiring a contractor under a Federal award to apply this section to subcontracts.

79

79

§200.323 Procurement of Recovered Materials

Subpart D. Post-Federal award requirements

Changes:

- *New section*

- **NEW (b)** The recipient or subrecipient should, to the greatest extent practicable and consistent with law, purchase, acquire, or use products and services that can be reused, refurbished, or recycled; contain recycled content, are biobased, or are energy and water efficient; and are sustainable. This may include purchasing compostable items and other products and services that reduce the use of single-use plastic products.

80

80

**Subpart D.
Post-Federal
award
requirements**

Changes:

- *New section*

§200.324 Contract cost and price

- (a) The recipient or subrecipient must perform a cost-benefit or price analysis for every procurement transaction, including contract modifications, in excess of the simplified acquisition threshold. The method and degree of analysis conducted depend on the facts surrounding the particular procurement transaction.
- (c) The cost plus a percentage of cost and percentage of construction cost methods of contracting must not be used

81

81



82

Subpart D. Post-Federal award requirements

§200.328 Financial reporting


- (a) Federal agency must require only OMB-approved government-wide data elements on recipient financial reports
- (b) No less frequently than annually nor more frequently than quarterly except in unusual circumstances.
- (c) Annual reports due after 90 calendar days, quarterly or semiannually reports due after 30 calendar days
- (d) Final reports are due after 120 calendar days for recipients and after 90 days for subrecipients

83

83

§200.329 (a-g) Monitoring and reporting program performance

Subpart D. Post-Federal award requirements



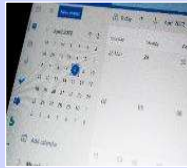
Monitor your own activities - ensure compliance & performance expectations	Relate financial data and project or program accomplishments and provide cost information	Annual reports due 90 calendar days after reporting period	Quarterly/ semiannual reports due 30 calendar days after reporting period
--	---	--	---

84

84

§200.329 (a-g) Monitoring and reporting program performance

Subpart D. Post-Federal award requirements



Final report due 120 days after period of performance end date; to PTE within 90 days



Inform funding source of significant developments such as meeting objectives sooner or less cost as well as problems, delays, or adverse conditions which materially impair the ability to meet objectives



The Federal agency or pass-through may conduct in-person or virtual site visits as warranted



The Federal agency may waive any performance report that is not necessary.

85

85

Subpart D. Post-Federal award requirements

§200.332 Requirements for pass-through entities

- (a) Must verify that the subrecipient is not excluded or disqualified



86

86

Subpart D. Post-Federal award requirements

§ 200.332 Requirements for pass-through entities

▪ (b) Federal Award Identification

- (i) Subrecipient's name (must match the name associated with its unique entity identifier);
- (ii) Subrecipient's unique entity identifier;
- (iii) Federal Award Identification Number (FAIN);
- (iv) Federal Award Date;
- (v) Subaward Period of Performance Start and End Date;
- (vi) Subaward Budget Period Start and End Date;
- (vii) Amount of Federal Funds Obligated in the subaward;
- (viii) Total Amount of Federal Funds Obligated to the subrecipient by the pass-through entity, including the current financial obligation;

(ix) Total Amount of the Federal Award committed to the subrecipient by the passthrough entity;

(x) Federal award project description, as required by the Federal Funding Accountability and Transparency Act (FFATA);

(xi) Name of the Federal agency, pass-through entity, and contact information for awarding official of the pass-through entity;

(xii) Assistance Listings title and number; the pass-through entity must identify the dollar amount made available under each Federal award and the Assistance Listings Number at the time of disbursement;

(xiii) Identification of whether the Federal award is for research and development; and

(xiv) Indirect cost rate for the Federal award (including if the de minimis rate is used in accordance with § 200.414).

87

87

§200.332 Requirements for pass-through entities

▪ **RENUMBER** (b) List of required information for every subaward, including:

Subpart D. Post-Federal award requirements

1. Federal award identification (14 items required to be disclosed)
2. All requirements, regulations and terms and conditions of the award
3. Any additional requirements imposed by the pass-thru entity in order for pass-thru entity to meet its responsibilities to the Federal agency
4. An approved indirect cost rate negotiated between the subrecipient and the Federal government. If no rate exists, either a rate negotiated between the pass-through entity and the subrecipient, or a de minimis indirect cost rate. **Cannot require the use of the de minimis if approved rate exists. Subrecipients may elect to use the cost allocation method for indirect costs.**
5. Subrecipient is required to permit pass-through entity and auditors' access to records to **fulfill its monitoring**
6. Terms and conditions of closeout

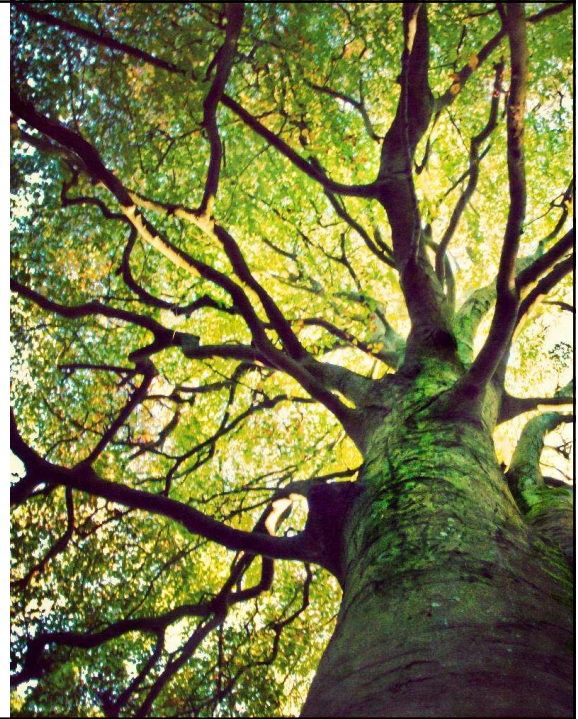
88

88

Subpart D. Post-Federal award requirements

§200.333 Fixed amount subawards

- ▶ Pass-through entity may provide fixed amount subawards
- ▶ Require prior approval from the Federal agency
- ▶ Can be made up to \$500,000



89

Subpart D. Post-Federal award requirements

§200.336 Methods for collection, transmission and storage of information

- When practicable must collect, transmit and store Federal award information in open and machine-readable formats.
- **Machine-readable format** – standard computer language that can be read automatically by your computer system
- Can scan paper records if there are quality controls, the electronic records provide reasonable safeguards against alteration and are readable.

§200.337 Access to records

- (c) Awarding and pass-through entities have access to records as long as they exist

90

90

**Subpart D.
Post-Federal
award
requirements**

§200.344 Closeout

- (a) Federal agency and pass-through entity must close out when all administrative actions are completed. If recipient or subrecipient fails to close out the award will be closed based on information available.
- **RENUMBER** (b) Recipient must submit all reports no later than 120 calendar days after the conclusion of the period of performance;; Subrecipient no later than 90 calendar days. Extensions may be approved
- **RENUMBER** (c) Liquidate all obligations no later than 120 calendar days after the end of the period of performance. Subrecipient must liquidate all obligations no later than 90 calendar days. May be extended

91

91

**Subpart D.
Post-Federal
award
requirements**

§200.344 Closeout (cont.)

- **RENUMBER** (h) Awarding agency must promptly **complete all closeout actions no later than one year** after the end of the period of performance. If the indirect cost rate has not been finalized and would delay closeout, the Federal agency is authorized to mutually agree with the recipient to close an award using the current or most recently negotiated rate. However, **the recipient is not required to agree to a final rate for a Federal award for the purpose of prompt closeout.**
- **RENUMBER** (i) If the recipient does not submit all reports, the Federal **agency must report the recipient's material failure to comply with the terms and conditions of the Federal award in SAM.gov.** Federal agencies may also pursue other enforcement actions as appropriate.

92

92

**Subpart D.
Post-Federal
award
requirements**

Changes:

- *Rewording*
- *Change to number 2*

§200.345 Post-Closeout adjustments and continuing responsibilities

- (a) The closeout of a Federal award does not affect any of the following.
 - (1) The right of the Federal agency or pass-through entity to disallow costs. Awarding agency must make any cost disallowance determinations and notify within the record retention period
 - (2) The recipient's or subrecipient's requirement to return funds or right to receive any remaining and available funds as a result of refunds, corrections, final indirect cost rate adjustments, or other transactions

93

93

**Subpart D.
Post-Federal
award
requirements**

Changes:

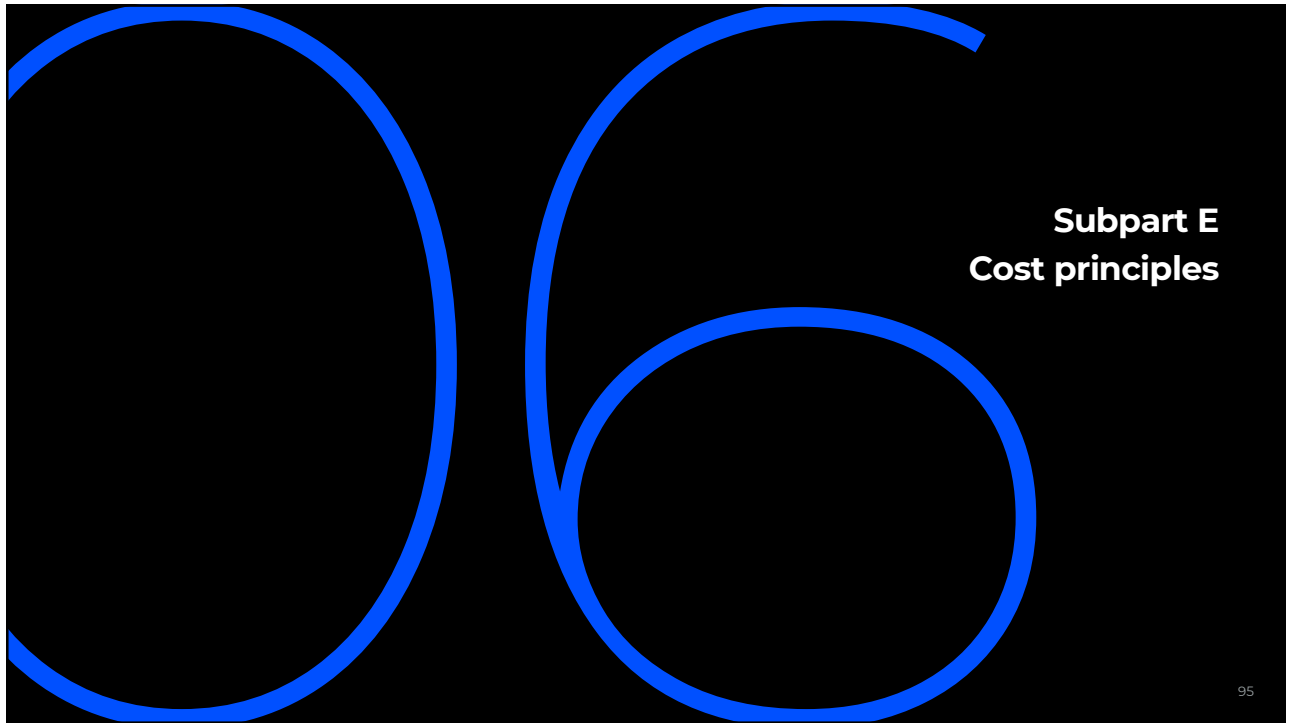
- *Rewording*
- *Change to number 2*

§200.345 Post-Closeout adjustments and continuing responsibilities

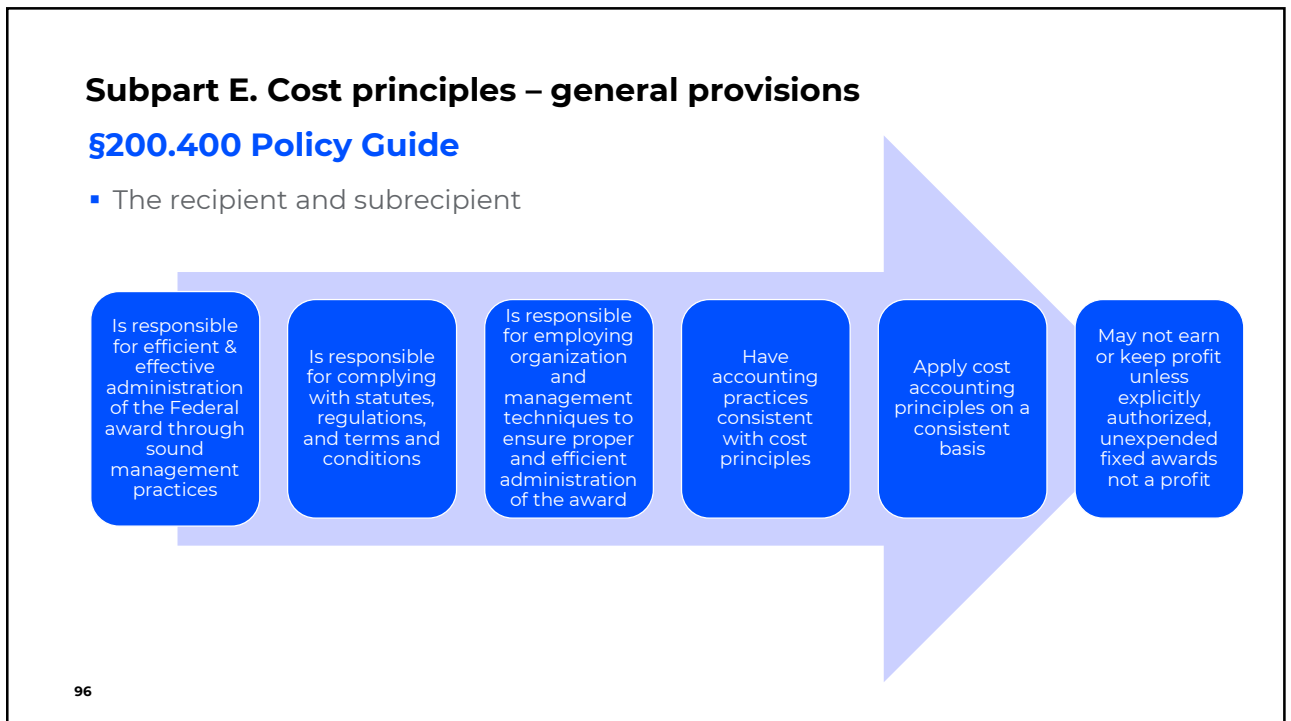
- (a) The closeout of a Federal award does not affect any of the following.
 - (3) Ability of the Federal agency or pass-through entity to make financial adjustments to a previously closed award such as resolving indirect cost payments and making final payments
 - (4) Audit requirements
 - (5) Property management and disposition requirements
 - (6) Records retention requirements

94

94



95



96

Subpart E. Cost principles – general provisions

§200.401 Application

- These principles must be used in determining the allowable costs of work performed by the recipient and subrecipient under Federal awards. Doesn't apply to fixed amount awards or awards not required to account for actual costs.



97

Subpart E. Cost principles – general provisions

§200.403 Factors affecting allowability of costs

- Be necessary and reasonable
- Conform to any limitations or exclusions in these principles
- Consistent procedures for both Federally-financed and other activities
- Be treated consistently
- Be determined in accordance with generally accepted accounting principles, as appropriate
- Not be included as cost sharing in any other Federally financed program (*current or prior*)
- Be adequately documented
- Administrative closeout cost may be incurred until the due date of the final report. All other costs must be in the approved budget period.

98

98

**Subpart E.
Cost
principles –
general
provisions**

Changes:

- *Minor rewording for clarification*

§200.404 Reasonable Costs

- A cost is reasonable if it does not exceed an amount that a **prudent person** would incur under the circumstances prevailing when the decision was made to incur the cost.
- Considerations for determining reasonable cost:
 - (a) Whether the cost is generally recognized as ordinary and necessary for operation of the organization or the proper and efficient performance of the award
 - (b) The restraints imposed by such factors as: sound business practices, arms length bargaining, Federal state and other laws and regulations, and terms and conditions of the Federal award
 - (c) Market prices for comparable goods or services for the geographic area
 - (d) Whether the individuals concerned acted with prudence in the circumstances
 - (e) Whether the cost represents a deviation from established written policies and procedures for incurring costs.

99

99

**Subpart E.
Cost
principles –
general
provisions**

§200.405 Allocable Costs

- (a) A cost is allocable to a Federal award or other cost objective, if the cost is assignable to that Federal award or other cost objective in accordance with the **relative benefits received**
 - (1) Is incurred specifically for the award;
 - (2) Benefits both the award and other work and can be distributed in proportions that may be approximated using reasonable methods or
 - (3) Is necessary to the overall operation of the organization and is assignable in part to the Federal award in accordance with these cost principles

100

100

**Subpart E.
Cost
principles –
general
provisions**

§200.405 Allocable Costs (cont.)

- (b) All activities which benefit from the recipient or subrecipient's indirect cost, **including unallowable activities and donated services**, will receive an appropriate allocation of indirect costs
- (c) Any cost allocable to a particular Federal award may not be charged to other Federal awards (for example to **overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the Federal awards**). *Would not preclude shifting costs that are allowable under two or more Federal awards in accordance with statutes, regulations, or terms and conditions of the Federal awards.*

101

101

**Subpart E.
Cost
principles –
general
provisions**

§200.405 Allocable Costs (cont.)

- (d) Direct cost allocation principles
 - If a cost benefits two or more projects or activities **in proportions that can be easily determined**, *without undue effort or cost* the cost must be allocated to the projects based on the proportional benefit
 - If a cost benefits two or more projects or **activities in proportions that cannot be determined because of the interrelationship** of the work involved, then the costs may be allocated on any reasonable documented basis

102

102

**Subpart E.
Cost
principles –
general
provisions**

§200.407 Prior Written Approval (prior approval)

- The reasonableness and allocability of certain costs may be difficult to determine. **To avoid subsequent disallowance or dispute based on unreasonableness or nonallocability, the recipient may seek the prior written approval of the Federal agency before incurring** the cost. The absence of prior written approval on any element of cost will not, in itself, affect the reasonableness or allocability of that cost, unless prior approval is specifically required
 - (a) – (p) list of sections in 2 CFR Part 200 requiring prior approval

103

103

Subpart E. Cost principles – general provisions

- | | |
|--|--|
| (a) Section 200.306 Cost sharing; | (i) Section 200.441 Fines, penalties, damages and other settlements; |
| (b) Section 200.307 Program income; | (j) Section 200.442 Fund raising and investment management costs; |
| (c) Section 200.308 Revision of budget and program plans; | (k) Section 200.445 Goods or services for personal use; |
| (d) Section 200.333 Fixed amount subawards; | (l) Section 200.447 Insurance and indemnification; |
| (e) Section 200.430 Compensation - personal services, paragraph (h); | (m) Section 200.455 Organization costs; |
| (f) Section 200.431 Compensation - fringe benefits; | (n) Section 200.458 Pre-award costs; |
| (g) Section 200.439 Equipment and other capital expenditures; | (o) Section 200.462 Rearrangement and reconversion costs; |
| (h) Section 200.440 Exchange rates; | (p) Section 200.475 Travel costs. |

104

104

**Subpart
E. Cost
principles –
direct**

Changes:

- *Removed 'Such costs are explicitly included in budget or have prior approval)*

§200.413 Direct Costs

- (c) Salaries of administrative and clerical staff **should normally** be treated as indirect. Direct charge only if **all** of the following are met:
 - (1) Administrative or clerical services are integral to the **Federal award**,
 - (2) Individuals involved can be specifically identified with the **Federal award**,
 - (3) The costs are not also recovered as indirect.

105

105

**Subpart E.
Cost
principles –
indirect**

§200.414 Indirect Costs

(c) Federal Agency Acceptance of Negotiated Indirect Cost Rates

- (1) Negotiated rate must be accepted by all Federal agencies
- (2) The recipient or subrecipient may notify OMB of any disputes with Federal agencies regarding the application of Federally negotiated indirect cost rate.

(d) Pass-through entities must accept all Federally negotiated indirect cost rates for subrecipients.

106

106

**Subpart E.
Cost
Principles –
direct and
indirect**

Changes:

- *Rate change from 10% to 'up to 15%'*

§200.414 Indirect (F&A) Costs

- (f) Recipients or subrecipients that **do not have a current** negotiated IDCR (including provisional rate) may elect to charge a de minimis rate **of up to 15%** of modified total direct costs (MTDC). **Recipients or subrecipients can determine the appropriate rate up to this limit.**
 - No documentation is required to justify its use and may be used indefinitely.

107

107

**Subpart E.
Cost principles –
direct and
indirect**

§200.415 Required Certifications

The annual and final fiscal reports or vouchers requesting payment must include a certification signed by an official who is authorized to legally bind the entity attesting to the following:

- “By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise.”

108

108

**Subpart E.
Cost principles –
direct and
indirect**

Changes:

- *New section*

§200.415 Required Certifications

Subrecipients under the Federal award must certify to the pass-through entity whenever applying for funds, requesting payment, and submitting financial reports:

- “I certify to the best of my knowledge and belief that the information provided herein is true, complete, and accurate. I am aware that the provision of false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative consequences including, but not limited to violations of U.S. Code.”
- Each such certification must be maintained pursuant to the requirements of § 200.334. This paragraph applies to all tiers of subrecipients.

109

109



110

**Subpart E.
Cost
principles –
selected
items of cost**

Changes:

- *Added example*

§200.421 Advertising and Public Relations

- Advertising – magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals
- Allowable advertising:
 - Recruitment of personnel
 - Procurement of goods and services
 - Disposal of scrap or surplus material
 - Program outreach necessary for the award (for example, **recruiting project participants**)

m

111

**Subpart E.
Cost
principles –
selected
items of cost**

§200.430 Compensation – personal services

- (i) Standards for Documentation of Personnel Expenses
 - (1) Records accurately reflect work performed (cont.)
 - (vii) Budget estimates alone do not qualify as support for charges but may be used for interim accounting purposes, provided that:
 - Must be reasonable approximations of the activity performed
 - Significant changes are promptly identified and entered. Short-term (1-2 months) fluctuations do not need to be considered as long as reasonable over the longer term
 - Internal control system includes review of after-the-fact charges and adjustments made so the final amount charged is accurate, allowable and properly allocated

n2

112

**Subpart E.
Cost
principles –
selected
items of cost**

Changes:

- *Change to cash basis*

§200.431 Compensation – fringe benefits

(a) Allowable if reasonable and required by law or entity policy

- (b)(3) Leave accounting methods:
 - (i) Cash basis – recognize when taken and paid
 - Payments for unused leave when an employee terminates are allowable in the year of payment and **must be allocated as a general administrative expense to all activities**
 - (ii) Accrual basis – allowable costs are the lesser of the amount accrued or the amount funded

113

113

**Subpart E.
Cost
principles –
selected
items of cost**

§200.431 Compensation – fringe benefits (cont.)

- (i) Severance Pay –
 - (1) allowable if required:
 - i. By law;
 - ii. Employer-employee agreement;
 - iii. Established policy that constitutes an implied agreement; or
 - iv. Circumstances of the particular employment.

(2) Severance payments must be allocated to all activities

114

114

**Subpart E.
Cost
principles –
selected
items of cost**

§200.432 Conferences

- An event whose primary purpose is to disseminate technical information **beyond the recipient or subrecipient**
- Allowable costs (appropriate, reasonable and necessary) paid by the host:
 - Facility
 - Speaker fees
 - Attendance fees
 - Meals and refreshments
 - Local transportation
 - Cost of **identifying and providing** locally available dependent care resources

115

115

**Subpart E. Cost principles –
selected items of cost**

§200.438 Entertainment and Prizes

- (a) Costs of entertainment are unallowable, unless they have a specific and direct programmatic purpose and are included in a Federal award.
- (b) **Costs of prizes or challenges are allowable if they have a specific and direct programmatic purpose and are included in the Federal award.**

116



116

**Subpart E.
Cost
principles –
selected
items of cost**

§200.447 Insurance and indemnification

(a) Costs of insurance required or approved and maintained by the terms and conditions of the Federal award are allowable

- (4) Insurance costs on the lives of trustees, officers, or other employees holding positions of similar responsibilities are allowable only when the insurance represents additional compensation (see § 200.431). This insurance is unallowable when the recipient or subrecipient is identified as the beneficiary.

(c) Actual losses which could have been covered by permissible insurance are unallowable

117

117

**Subpart E.
Cost
principles –
selected
items of cost**

§200.454 Membership, subscriptions, and professional activity costs

(a) Costs of membership in business, technical, and professional organizations are **allowable**.

(b) Costs of subscriptions to business, professional, and technical periodicals are **allowable**.

(c) Costs of membership in any civic or community organization are **allowable**.

(d) Costs of membership in any country club or social or dining club or organization are **unallowable**.

(e) Costs of membership in organizations whose primary purpose is **lobbying are unallowable**.

Changes:

- *Removed prior approval for (c)*

118

118

**Subpart E.
Cost
principles –
selected
items of cost**

Changes:

- Updated title

§200.472 Termination and standard closeout costs

(a) (1) Termination - Costs of items reasonable usable in other work is unallowable

(a) (4) Rental costs under unexpired leases are generally allowable if:

- (i) The amount is reasonable
- (ii) Effort is made to terminate, assign or otherwise reduce the cost

(a) (5) Settlement expense including accounting, legal, clerical or similar costs are generally allowable

119

119

**Subpart E.
Cost
principles –
selected
items of cost**

Changes:

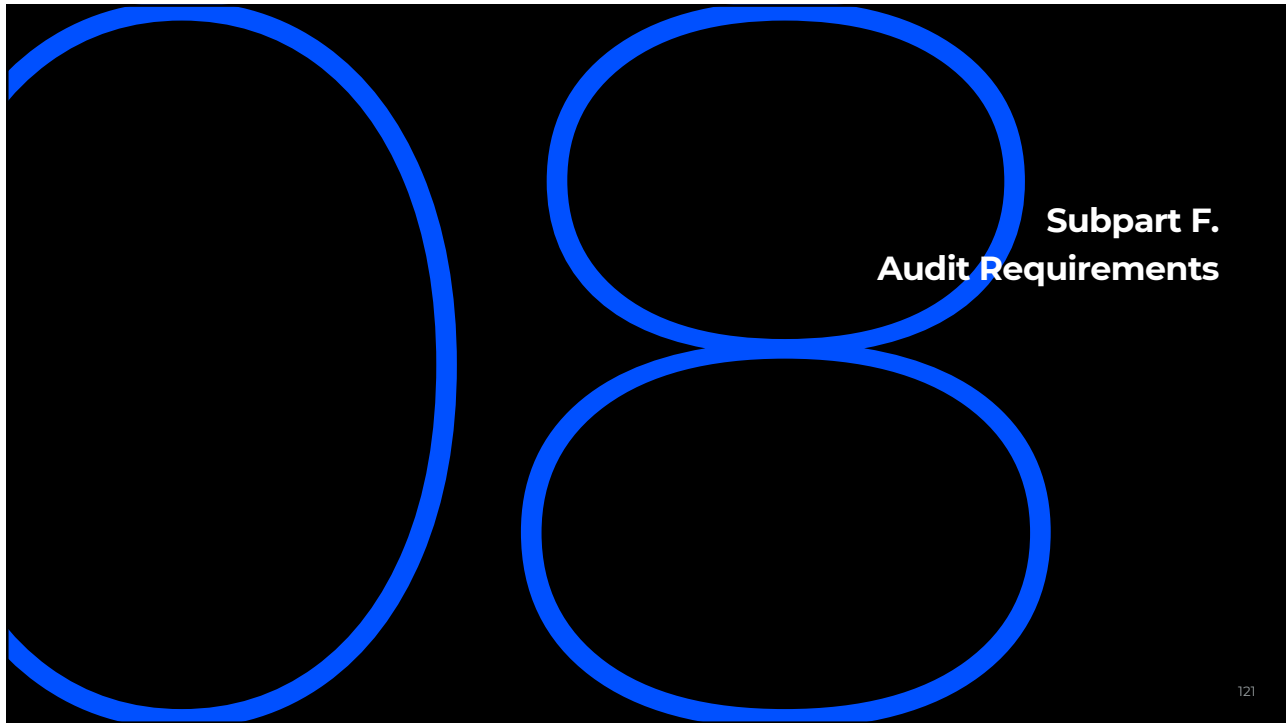
- New section

§200.472 Termination and standard closeout costs

- (b) Closeout Costs - Administrative costs associated with the closeout activities of a Federal award are allowable. The recipient or subrecipient may charge the Federal award during the closeout for the necessary administrative costs of that Federal award (for example, salaries of personnel preparing final reports, publication and printing costs, costs associated with the disposition of equipment and property, and related indirect costs). These costs may be incurred until the due date of the final report(s). If incurred, these costs must be liquidated prior to the due date of the final report(s) and charged to the final budget period of the award unless otherwise specified by the Federal agency.

120

120



121

Subpart F. Audit requirements
§200.501 Audit Requirements

- (a) Audit required.
- A non-Federal entity that expends **\$1,000,000** or more during the it's fiscal year in Federal awards must have a single or program-specific audit



122

122

Subpart F. Audit requirements

Changes:

- Update to (a)(1)

§200.512 Report Submission

- General.
 - (a) (1) The audit, data collection form and the reporting package must be submitted **within 30 calendar days** after the auditee receives the auditor's report(s), **or nine months** after the end of the audit period, whichever is earlier. **The cognizant agency for audit or oversight agency may authorize an extension when the nine month timeframe would place an undue burden on the auditee.**
 - (2) Auditee must make copies available for public inspection. Auditee and auditor must ensure that the reporting package does not include protected personally identifiable information

123

123

wipfli.com/nonprofits

Stay Connected

My Wipfli — Access to our experts

wipfli.com/mywipfli

- Regulation questions
- Audit
- Process
- Human Resource
- Technology
- Leadership

Bring Wipfli to you

Kate D. Atkins, MS
katkins@wipfli.com
608 270 2944

Social media:

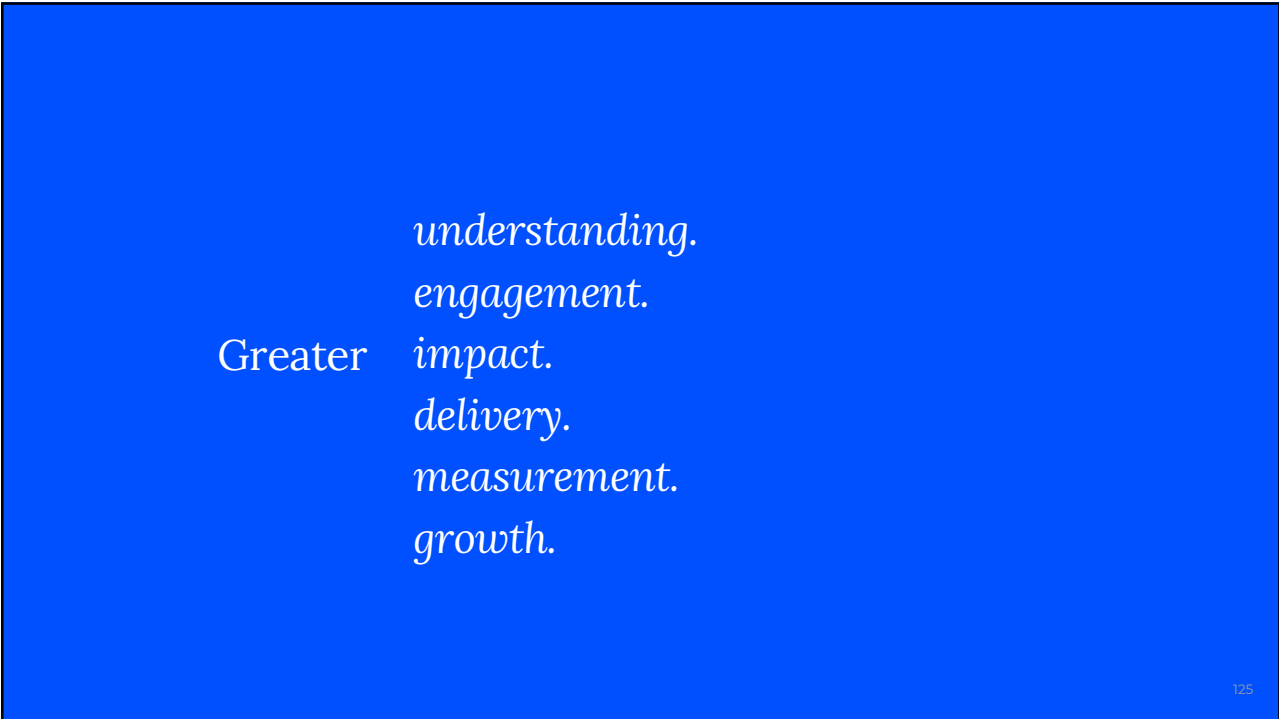
- [linkedin.com/in/denestobie](https://www.linkedin.com/in/denestobie)
- [linkedin.com/in/ciaraleahyngp/](https://www.linkedin.com/in/ciaraleahyngp/)
- [linkedin.com/showcase/wipfli-nonprofit](https://www.linkedin.com/showcase/wipfli-nonprofit)
- [facebook.com/WipfliNGP](https://www.facebook.com/WipfliNGP)

How did we do?
Please take a moment to
fill out your evaluation.



WIPFLI

124



Greater *understanding.*
engagement.
impact.
delivery.
measurement.
growth.

125

125



Thank you.

Denes Tobie, CPA
Partner

608.270.2929
dtobie@wipfli.com

Ciara Leahy, CPA
Senior Manager

847.348.6504
ciara.leahy@wipfli.com

wipfli.com

© 2024 Wipfli LLP. All Rights reserved. "Wipfli" refers to Wipfli LLP.

126

126

Thank You

Thank you for your participation.
We hope today's webinar met your expectations.

For further assistance,
please contact us at 888.876.4992
or e-mail us at gfponline@wipfli.com.

127

127



128