August 8, 2017

Charles Greer  
Associate VC - Research & Sponsored Programs  
Office of Research and Economic Development  
Riverside, CA 92521

Subject: Delayed Implementation of OMB Uniform Guidance Procurement Standards

As follow up to the attached September 22, 2015 memo, in accordance with the Federal Notice published May 17, 2017 (82 FR 22609) and FAQs*, a grace period is now allowed for three full fiscal years after the effective date of the Uniform Guidance for Procurement. Therefore, the University of CA – Riverside (UCR) will delay implementation of the new federal procurement standards found at 2 CFR Part 200, sections 200.318 et seq., until July 1, 2018.

UCR Procurement Services will continue to follow the federal procurement rules found in Office of Management and Budget (OMB) Circular A-110.

Sincerely,

Bobbi McCracken
Associate Vice Chancellor-Business & Financial Service and Controller

Cc:   Ellery Triche, Director of Procurement  
       Lisa Boerner, Procurement Manager
110-6 Effective Dates and Grace Period for Procurement ** Will the Federal government provide a grace period after the effective date for non-Federal entities to comply with the procurement standards in the Uniform Guidance?

Yes, in accordance with the Federal Notice published May 17, 2017 (82 FR 22609), a grace period is allowed for three full fiscal years after the effective date of the Uniform Guidance. In general non-Federal entities must comply with the terms and conditions of their Federal award, which will specify whether the Uniform Guidance applies. However, in light of the new procurement standards, for procurement policies and procedures, for the non-Federal entity’s first full fiscal year that begins on or after December 26, 2014, the non-Federal entity must document whether it is in compliance with the old or new standard, and must meet the documented standard. For example, the third full fiscal year for a non-Federal entity with a June 30th year end would be the year ending June 30, 2018. The Single Audit Compliance Supplement will instruct auditors to review procurement policies and procedures based on the documented standard. For future fiscal years, all non-Federal entities will be required to comply fully with the uniform guidance.

MEMORANDUM

To: Bobbi McCracken, Associate VC/Controller - Business and Financial Services
   Charles Greer, Associate VC - Research & Sponsored Programs

From: David M. Gee, Interim Director – Procurement, Business Contracts & Accounts Payable

Date: September 22, 2015

Subject: Delayed Implementation of OMB Uniform Guidance Procurement Standards

Per the rule published in the Federal Register by the Management and Budget Office on 09/10/2015: Universal Identifier and System of Award Management; Corrections, The University of CA – Riverside (UCR) will delay implementation of the new federal procurement standards found at 2 CFR Part 200, sections 200.318 et seq., until July 1, 2017. This guidance regarding the effective/applicability date has been revised to allow a grace period of two fiscal years for non-Federal entities to implement changes to their procurement policies and procedures in accordance with guidance on procurement standards.

UCR Procurement Services will continue to follow the federal procurement rules found in Office of Management and Budget (OMB) Circular A-110.

Located at 2 CFR 200, the OMB Uniform Guidance guidance supersedes and streamlines the following eight existing OMB Circulars:
• A-21 Cost Principles for Educational Institutions
• A-87 Cost Principles for State, Local and Indian Tribal Governments
• A-122 Cost Principles for Non-Profit Organizations
• A-110 Uniform Administrative Requirements for Grants and Other Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations
• A-102 Grants and Cooperative Agreements With State and Local Governments
• A-133 Audits of States, Local Governments and Non-Profit Organizations
• A-50 Audit Follow-up
• A-89 Catalog of Federal Domestic Assistance

Uniform Guidance is a major reform of how the federal government provides assistance awards (e.g., grants and cooperative agreements) with the goal of increasing accountability and transparency while reducing the administrative burden on non-federal entities receiving federal awards.

Additional Information: UCOP – Research Policy Analysis and Coordination - Uniform Guidance