

PI Disengagement

CFR 200.308

Rice and OMB recognize that Principal Investigators may be away from campus and remain engaged in the project. Prior approval from the awarding agency must be obtained for any of the following reasons:

- ◆ Change in scope or objective of the project
- ◆ Change in Key Person named in the grant application
- ◆ Disengagement of the PI from the project for more than 3 months
- ◆ Reduction of 25% or more in committed time to the project by the program director or PI

Record Retention

CFR 200.333

To ensure compliance with sponsor and other regulatory record retention requirements, financial records and research data for individual sponsored projects are to be retained for a minimum of four years after the project end date.

If a sponsor's record retention period is greater than four years after the project end date, the period specified in the award agreement is to be followed.

The Guidelines section of the RCA website has additional information on record retention requirements.

If you have any questions, please direct them to uniformguidance@rice.edu.

For additional information see the [Uniform Guidance](#) section of the Controller's Office website.

Subawards

Risk Assessment and Monitoring

CFR 200.330-200.332

Uniform Guidance will now require that Rice assess/evaluate each proposed subrecipient prior to the submission of the proposal to the federal agency. Risk factors may include:

- ◆ Prior experience
- ◆ A-133/UG Audits
- ◆ Monitoring by federal agencies
- ◆ Personnel or system changes

A risk questionnaire (found on the OSR Forms website) should be completed by each proposed subrecipient and then must be uploaded into Cayuse.

Subrecipients are entitled to their federally-negotiated F&A rate. If the entity does not have a negotiated F&A rate, Rice will use 10% of the modified total direct costs as the subrecipient's F&A rate.

With federal agency prior approval, fixed price/rate subawards up to \$150,000 are permissible. Fixed amount subawards can be used when there is a "specific" project scope and "adequate cost, historical or unit price data is available" to assure that the subrecipient will "realize no increment above actual cost" i.e., no profit.

This type of subaward is most commonly used by Rice for foreign subrecipients and small businesses. Please contact OSR if you are contemplating a fixed price/rate subaward.

Email: osr@rice.edu
Website: osr.rice.edu



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UNIFORM GUIDANCE

The Office of Management and Budget (OMB) has combined many federal circulars into a single guidance document, known as Uniform Guidance (UG) that is to be used by all agencies. The new regulations became effective December 26, 2014.



Proposal Budgets & Charging Expenses to Grants & Contracts

CFR 200.403 - 200.405

The factors on allowability of costs remain the same: reasonable; necessary; allocable; consistently treated across funding sources; and in accordance with award terms as well as Rice policies and procedures.

If costs that need agency approval are specifically identified and supported in the proposal budget and budget narrative, subsequent award by the agency will be considered prior agency approval.

Administrative & Clerical Costs

CFR 200.413

Administrative and clerical (A&C) salaries & wages and supplies & expenses can be directly charged with written agency approval (or in the approved proposal budget).

Under the new guidance, A&C labor costs can be directly charged when **all** of the following conditions are met:

- ♦ Administrative or clerical services are integral to a project or activity; and
- ♦ Individuals involved can be specifically identified with the project or activity; and
- ♦ Such costs are explicitly included in the budget or have the prior written approval of the awarding agency.

See the Guidelines section of the RCA website for additional information on A&C costs.

Computing Devices

CFR 200.453

Computing devices under \$5,000 are considered “supplies” and can be charged directly to federally sponsored projects as long as they are essential and allocable to the performance of the award. They do not need to be solely dedicated for use on the award.

Cost Sharing

CFR 200.306

Voluntary committed cost sharing is neither expected nor considered during merit review of grant proposals unless it is explicitly specified in a notice of funding opportunity.

Cost sharing is that portion of total project costs (including direct costs and related indirect (F&A) costs) not provided by the sponsoring agency.

In the rare case where F&A is proposed as cost sharing, the proposal must include both the unrecovered indirect costs on the award plus the F&A on the cost shared portion. Both types of F&A require the prior approval of the Federal awarding agency in order to be considered allowable cost sharing.

See [Rice Policy 306 Cost Sharing](#), and related procedures for additional information on proposing and charging cost sharing. The cost sharing form is available on the OSR website forms section.

Closeout Reports

CFR 200.343

All closeout reports are to be submitted no later than 90 calendar days after the project end date. This includes the final financial report, technical report, and patent report.

Participant Support Costs

CFR 200.456 & 200.75

Participant support costs are only allowable with prior agency approval.

Participant support costs are excluded from F&A charges.

See the OSR website for detailed information about proposing and charging participant support costs.

Procurement

CFR 200.317-200.326

The UG emphasizes the need for competition and supporting documentation. The use of Rice’s preferred vendors for purchases less than \$25,000 addresses this concern with no additional documentation of the competitive process required. Items purchased from other vendors will require documentation of a review or competitive process unless a sole source justification is provided. Purchases greater than \$25,000 must be competitively bid. See [Rice Policy 814 Procurement](#) and related procedures for additional information.



Visa Costs

CFR 200.463

Short term travel visa costs are allowable as long as the visas are issued for a **specific period and purpose, and can be clearly identified as directly connected** to the work performed on a federal award.