



Results-Oriented Accountability for Grants



Session Objectives

1. Discuss the proposed 2CFR revisions

2. Discuss how to submit comments for the proposed revisions

3. Receive feedback from attendees on the proposed revisions



The 2 CFR revision reflects the foundational shift outlined in the President's Management Agenda (PMA) to set the stage for enhanced result-oriented accountability for grants.

This guidance is the beginning of the Administration's pivot towards actions geared to focus on improved stewardship and ensuring that the American people are receiving value for money spent on grant programs.



Why are we making the revision now?

- 1. Guidance itself calls for lookback
- 2. Statutory requirements
- 3. President's Management Agenda initiatives

How did we choose to which revisions to make?

The scope of the proposed revision was limited to (see preamble):

- 1. To support implementation of the President's Management Agenda Results-Oriented Accountability for Grants CAP Goal and other Administration priorities
- 2. To meet statutory requirements and to align with other authoritative source requirements
- 3. To clarify existing requirements





Title 2 Parts Proposed for Revision

- Part 25: UNIVERSAL IDENTIFIER AND SYSTEM FOR AWARD MANAGEMENT
- Part 170: REPORTING SUBAWARD AND EXECUTIVE COMPENSATION INFORMATION
- Part 183 (new section): NEVER CONTRACT WITH THE ENEMY
- Part 200 (Uniform Guidance): UNIFORM ADMINISTRATIVE
 REQUIREMENTS, COST
 PRINCIPLES, AND AUDIT
 REQUIREMENTS FOR FEDERAL
 AWARDS

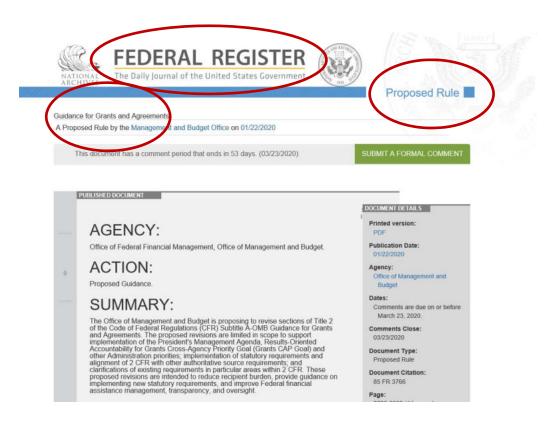


- 1. How to access the Federal Register, submit a comment, and provide a comment in the requested format
 - Begin each comment with the section number in brackets. For example; if the comment is on 2 CFR 200.1 include the following before the comment [200.1]
 - https://www.federalregister.gov/documents/2020/01/22/2019-28524/guidance-for-grants-and-agreements
- 2. How to access the proposed revisions in tracked changes and sign up for the listening session
 - https://www.performance.gov/CAP/grants/





How to access the guidance in the Federal Register





How to provide a comment in the requested format within the Federal Register

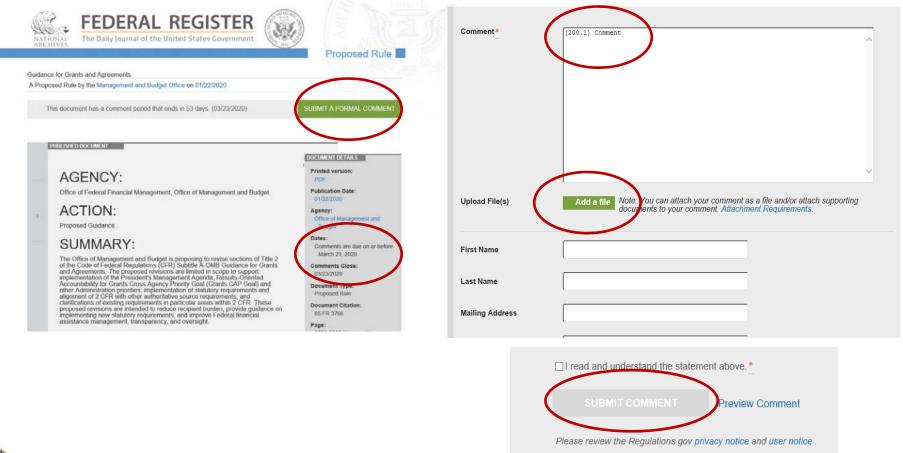
ADDRESSES:

Comments on this proposal must be submitted electronically before the comment closing date to www.regulations.gov. In submitting comments, please search for recent submissions by OMB to find docket OMB-2019-0005, which includes the full text of the proposed revisions and submit comments there. Please provide clarity as to the section of the guidance that each comment is referencing by beginning each comment with the section number in brackets. For example; if the comment is on 2 CFR 200.1 include the following before the comment [200.1]. The public comments received by OMB will be a matter of public record and will be posted at http://www.regulations.gov. Accordingly, please do not include in your comments any confidential business information or information of a personal-privacy nature. To reference the track changes of the proposed revisions please visit https://www.performance.gov/CAP/grants/. In general, responses to the comments will be summarized and included in the preamble of the final guidance.





How to submit a comment in the Federal Register







Proposed Revisions

Support implementation of the President's Management Agenda Results-Oriented Accountability for Grants CAP Goal and other Administration priorities

Some revisions include (see preamble for more details):

- Emphasizing stewardship and results-oriented accountability for grant program results (§§ 200.202, 200.102(d), 200.205, 200.207, 200.210(a), 200.210(b)(17), 200.210(c)(2), 200.210(c)(iv), 200.210(c)(v), §200.301, 200.339(a)(2), Appendix I (A) & (B))
- Standardization of terminology and implementation of standard data elements (§§ 200.1, 200.301, 200.312(c), 200.328(b)(2))
- Making indirect cost rate agreements transparent (§200.414(h))
- Strengthening merit review by requiring a merit review process for discretionary grants (§200..204)



Proposed Revisions

Meet statutory requirements and align with other authoritative source requirements

Some revisions include (see preamble for more details):

- Aligning 2 CFR to the Federal Acquisition Regulation (FAR) and the 2017 and 2018
 National Defense Authorization Acts (NDAA) to raise the micro-purchase threshold
 from \$3,500 to \$10,000 and the simplified acquisition threshold from \$100,000 to
 \$250,000 (§§200.2, 200.319)
 - Aligning 2 CFR with the 2019 NDAA section 889, Prohibition on certain telecommunications and video surveillance services or equipment (§200.216)
 - Aligning 2 CFR with the General Accepted Accounting Principles (GAAP),
 specifically the Government Accounting Statements Board (GASB) statement
 68 and 45, related to pension costs and depreciation (§200.431)



Proposed Revisions

Clarifying existing requirements

Some revisions include (see preamble for more details):

- Codifying some frequently asked questions related to the prior release to 2 CFR (§§200.101, 200.331, 200.414)
- Clarifying the responsibilities of the pass-through entity to address only a subrecipient's audit findings related to their specific subaward (§200.331)
- Clarifying the documentation requirement for using the de minimis indirect cost rate (§200.414)



1. Major revisions to the guidance in the 3 scope areas:

- Support implementation of the President's Management Agenda Results-Oriented Accountability for Grants CAP Goal and other Administration priorities
- Meet statutory requirements and to align with other authoritative source requirements
- Clarify existing requirements

2. Provide comments through the Federal Register:

 https://www.federalregister.gov/documents/2020/01/22/2019-28524/guidance-for-grants-and-agreements

3. Access the proposed revisions in tracked changes:

https://www.performance.gov/CAP/grants/





Contact OMB with Questions

We are here to help!

Email us your questions:

GrantsTeam@omb.eop.gov







We want to hear from you!

Feedback?

