PROJECT LOCATION and F&A RATE

When routing a project, it is critical that you enter the actual location of the majority of the work and classify the project accordingly as on or off campus. If the location changes by the time that the award is received, please notify OGC to ensure that the location is accurately reflected in our system and the on or off-campus classification is adjusted if appropriate along with the F&A rate. It is critical that we classify our project location accurately to ensure the appropriate F&A rate is charged.

Below is the location on the routing form for this information. If the project location changes by the time of award, please notify Bryce Walsh at Bryce.Walsh@ucdenver.edu.

90, 60, 30 PROJECT CLOSEOUT REPORT

The Office of Grants and Contracts is now bursting the 90, 60, 30 Project Closeout report each month after close. The current report will be burst this week.

The report is to show projects that are ending within the next 90, 60, or 30 days.

The report is burst to the projects fiscal manager role (GADM). If you are not the GADM on projects you can work with your sections GADM to have information forwarded to you via outlooks rules.

The report contains:

1. Project nearing end date to help determine if extension is needed or the project will close.
2. Balance information to help you review/reconcile your project as we approach the project end date.
3. Outstanding encumbrance information to help with any actions needed to close those encumbrances.
4. Cash/AR information to determine if sponsor has been paying as expected.

For more detailed instructions on how to use the reports, see a sample report, or to review and update project roles please follow the link Closeout Timeline.

If you have comments or questions about the report format or distribution please contact Ginger.Acierno@ucdenver.edu or Stephanie.Thompson@ucdenver.edu.

This report was created with the assistance of the Reporting Workgroup. The reporting work group contains a variety of department partners, and helped us to determine the best audience for this report, to approve formatting, and to make sure all information needed to assist with actions the department may take are included. With this groups invaluable input and requested changes we believe we have created a report that helps departments to understand what projects are closing soon and what actions are needed on those projects.
OMB PLANS UPDATES TO 2 CFR 200 (UNIFORM GUIDANCE)

The Grants.gov Community Blog recently reported on potential updates to 2 CFR 200 (Uniform Guidance). Since 2016, the Office of Management and Budget (OMB) has been publicly discussing the need to revise 2 CFR 200 to incorporate numerous grants-related laws. OMB has not provided a timeframe for the updates.

Some of the anticipated changes to 2 CFR 200 may address:

- The Grants Oversight and New Efficiency Act (GONE Act). The GONE Act requires Federal agencies to report to Congress on grant closeout activities and provide the number of grant award accounts that remain open two years after the end of the award.
- The 21st Century Cures Act and the American Innovation and Competitiveness Act (AICA). Both laws include provisions to reduce administrative burdens for federal research grants.
- Buy American Laws. In June 2017, OMB released a memorandum to Federal agencies regarding the applicability of the Buy American Laws. The memorandum directed agencies to: evaluate and report on how Buy American Laws apply to Federal grants; identify guidance provided to grant recipients regarding compliance with Buy American Laws; and, summarize agency compliance with Buy American Laws.
- The Digital Accountability and Transparency Act (DATA Act). The DATA Act increases government transparency and accountability by requiring the use of government wide data elements to report Federal spending. DATA Act requires OMB to determine whether to apply the DATA Act requirements to grant recipients by August 2018.
- The National Defense Authorization Act for Fiscal Year 2017 (NDAA). The NDAA for FY 2017 altered the micro-purchase threshold for procurements made under research awards. Section 217 of the law increases the micro-purchase threshold for Defense Department research awards to $10,000. Additionally, the NDAA for FY 2017 increases the micro-purchase threshold for universities, independent research institutions, and nonprofit research organizations to $10,000 or to “such higher threshold as determined appropriate by the head of the relevant executive agency and consistent with clean audit findings under chapter 75 of title 31, internal institutional risk assessment, or State law.”

Please note that OGC is following any updates closely and OGC will communicate any changes to university policies or procedures.

COMMON RULE DELAY

In January, 16 federal departments and agencies issued an Interim Final Rule that delays the implementation of the revised Common Rule until July 19, 2018.

The Interim Final Rule states:

Prior to July 19, 2018, regulated entities will continue to comply with the pre-2018 Requirements and those requirements will be enforced by the Common Rule departments and agencies. To clarify, regulated entities are not allowed, prior to July 19, 2018, to comply with the 2018 Requirements in lieu of the pre-2018 Requirements. Unless further regulatory action is taken, studies initiated on or after July 19, 2018, will be required to comply with the 2018 Requirements. Studies initiated prior to July 19, 2018 (i.e., studies initially approved by an IRB, studies for which IRB review was waived pursuant to § §.101(i), or studies determined to be exempt, before July 19, 2018) would, as a default, continue to be subject to the pre-2018 Requirements for their duration. The Interim Final Rule also indicated that the federal agencies are developing a notice of proposed rulemaking to further delay the new requirements until January 21, 2019.
NIH PROVIDES CLARIFICATION TO CLOSEOUT REQUIREMENTS

The National Institutes of Health (NIH) provided clarification to NOT-OD-18-107 NIH Enforcement of Closeout Policies. The Notice states: “Without prior approval from the awarding IC, NIH will initiate unilateral closeout for all awards that fail to meet closeout requirements within 120 days as required by the NIH Grants Policy Statement (NIH GPS) Section 8.6”

NIH informed the Council on Governmental Relations (CORG) that the Notice was to emphasize the NIH requirement for grant recipients to meet all closeout requirements within 120 days, and not to indicate that unilateral closeout would begin on day 121. The NIH stated that unilateral closeout will begin within 180 days for all awards that fail to meet closeout requirements within the 120 day requirement. NIH plans to provide additional information to clarify the Notice.

Modification from Feb. 2018 new Gift Mailbox communication:

ALL fund 35 requests need to go to SOM.AEFDEF@ucdenver.edu. Once reviewed and approved, requests will be forwarded to OGC.Gifts@ucdenver.edu.

Apologies for any confusion or inconvenience. ~ Shanelle Roquemore

AWARD NOTIFICATIONS FOR CHANGES TO EXISTING PROJECTS/SPEEDTYPES

Office of Grants and Contracts would like to announce that starting in the next week automatic notifications will go out when changes are made to existing awards. These notifications are for extensions and increases to budgets for existing projects/speedtypes.

One email per project will be sent to the entire project team and fiscal staff for the specific Project/SpeedType that was updated during that business day. The email will contain header information specific to the award, the “Old Project Values”, and the “New Project Values” (Please note the new “Project Budget” value is the total new value and not just the amount of the change.)

Here is a sample of the content.

Award Number: CMMI 1234567
Proposal Number: 09XX.YY.ZZZZZZ
Sponsor: National Science Foundation
Grant Accountant: Sir Grant-Accountant (First Name Last Name)

<table>
<thead>
<tr>
<th>Old Project Values</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PI</td>
<td>Co-PI</td>
</tr>
<tr>
<td>John Doe</td>
<td>Jane Doe</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>New Updated Project Values</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PI</td>
<td>Co-PI</td>
</tr>
<tr>
<td>John Doe</td>
<td>Jane Doe</td>
</tr>
</tbody>
</table>

If you have questions or comments about this process please contact bryce.walsh@ucdenver.edu or ginger.acierno@ucdenver.edu.
FRINGE BENEFIT TOWN HALLS

Please join us at one of the Fringe Benefit Town Hall meetings, where the Budget and Finance teams will be presenting details on budgeting and actuals for the new composite fringe benefit model, which is anticipated to take effect on July 1, 2018. During these two sessions, the Budget and Finance teams will explain the who/what/when/where/why of the new composite fringe benefits model, and the impacts you should expect to see.

Feel free to attend on either campus, however please be sure to register at [https://www.surveymonkey.com/r/Fringe_Benefit](https://www.surveymonkey.com/r/Fringe_Benefit)

CU Denver
Date: Tuesday, April 17, 2018
10:00-11:30am
Location: Business School, Room 4500

CU Anschutz
Date: Wednesday, April 18, 2018
9:30-11:00am
Location: Ed 2 North, Room 1102

WELCOME NEW TEAM MEMBERS!

Denise Queen – Contracting Services Manager
Denise is joining us from DSST Public Schools where she previously served as the Director of Development. At DSST, she managed their Grants and Contracts section. Additionally, she worked with their advancement committee to raise funds for the school.

Brent Larson – Contracts Specialist
Brent is joining us from the Colorado Department of Labor and Employment where he previously served as a Compliance Investigator. At CDLE, he was responsible for adjudicating complaints for violations of Colorado wage and hour laws. Brent also served the State of Colorado as a Public Defender.

www.ucdenver.edu/OGC