

November 10, 2020

A MESSAGE FROM JEAN FELDMAN, HEAD POLICY OFFICE, NATIONAL SCIENCE FOUNDATION

Revision of the Research Terms and Conditions

Dear Colleagues:

The Office of Management and Budget (OMB) mandated awarding agencies adopt recent revisions to 2 CFR §200; *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance) effective November 12, 2020. The purpose of this message is to make you aware that the Research Terms and Conditions (RTCs) have been revised by the participating agencies for consistency with the revised 2 CFR §200. NSF serves as the steward of these terms and conditions, and maintains the [RTC website](#) on behalf of all of the participating agencies.

At this time, the agencies participating in this activity include the: U.S. Department of Commerce/National Oceanic and Atmospheric Administration & National Institute of Standards and Technology; U.S. Department of Energy; National Aeronautics and Space Administration; National Science Foundation; U.S. Department of Health and Human Services/National Institutes of Health & Food and Drug Administration; U.S. Department of Agriculture/National Institute of Food and Agriculture; and the U.S. Department of Homeland Security.

[Agency implementation statements](#) provide specific details on how participating agencies are implementing the revised RTCs.

In accordance with this requirement, the updated RTCs, which implement the changes to 2 CFR §200, will be fully effective beginning November 12, 2020. This includes the following documents:

- RTC Overlay to 2 CFR §200;
- RTC Appendix A: Prior Approval Matrix;
- RTC Appendix B: Subaward Requirements;
- RTC Appendix C: National Policy Requirements; and
- Agency Specific Requirements for the participating agencies.

While the Uniform Guidance outlines provisions that are specific to research, these Research Terms and Conditions:

- Incorporate the entire Uniform Guidance by reference, clarifying or supplementing select provisions where appropriate and consistent with government-wide research policy;
- Apply to an award when included as part of the award or when incorporated in the award by reference. Use of the RTCs is envisioned as a streamlined approach that supports the implementation of the Uniform Guidance by providing clarification, supplementary guidance, and, where appropriate, selected options, while meeting the spirit and intent of a uniform implementation;
- Include flexibility for additional individual agency clarification through the incorporation of agency specific requirements.

Please note that the previous version of the RTCs incorporated the full set of OMB Frequently Asked Questions (FAQs) by reference. This set of FAQs has not yet been updated to align with 2 CFR §200, and, as such has been deleted from the RTC Overlay.

Award specific questions should be directed to the applicable participating agency.

Best,

Jean Feldman (Head, Policy Office, NSF) and Michelle Bulls (Director, Office of Policy for Extramural Research Administration, NIH) co-Chairs, Research Terms and Conditions Working Group



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