

November 10, 2020

Changes to Uniform Guidance

The Office of Management and Budget (OMB) issued changes to the 2 CFR 200, commonly referred to as Uniform Guidance. Please be aware of the following changes:

- SAM registration numbers will be replaced with the new Unique Entity Identifier (UEI) and the use of the UEI will replace the use of the DUNS. The transition to the UEI is currently anticipated to be completed by April 2022. With this change, UM will consolidate all campuses under one UEI.
 - **Impact:** Once implemented, the UEI (and not the DUNS) must be used on all applications.
- A new requirement that the Federal award must be managed and administered in a manner to ensure expenditures and associated programs are implanted in “full accordance with the Constitution, Federal Law, and public policy requirements”. This clause must be flowed down to subrecipients.
 - **Impact:** Foreign subrecipients may not agree to this clause and UM will not be able to issue the subaward unless they accept it. The Council on Governmental Relations (COGR) which works on behalf of universities and other research institutions has raised this concern to OMB.
- Under the new regulations, UM is prohibited from working with certain companies or using their products. This applies to the entire institution (it is not project specific). UM will screen vendors to ensure compliance.
 - **Impact:** UM may not be able to contract or work with vendors that are not compliant with these regulations.
- New awards may include “performance goals, indicators, targets and baseline data” terms including how the awarding agency will assess performance.
 - **Impact:** PIs should carefully review these terms to ensure they will meet them during the performance of the project.
- Agencies may terminate awards in whole or in part “to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities.”
 - **Impact:** Awards may be terminated for reasons that are outside of the control of the PI and UM. It is not clear how the agencies will implement this regulation which UM will continue to monitor.

[Contact ORA](#) with any questions or concerns about your existing or future projects.



For more information, please visit the ORA website at www.ora.miami.edu.