

November 10, 2020

Notice of Changes to Regulations Governing Federal Awards

There have been a series of changes to regulations governing federal awards, most of which will become effective November 12th. Below, we summarize some of the changes and the potential implications for University faculty.

- Awards must be managed and administered in a manner to ensure they are “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.
- UM is prohibited from working with certain companies or using their products. This applies to the entire institution (it is not project specific).
 - **Impact:** UM will not be able to contract or work with vendors that are not compliant with these regulations. Prohibited entities include, but are not limited to Huawei Technologies Company, ZTE Corporation and Kaspersky Lab.
- New awards may include “performance goals, indicators, targets and baseline data” terms including how the awarding agency will assess performance.
 - **Impact:** Faculty and researchers 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.

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

