Federal Regulations/ 
ASRSP Staffing 
Updates

Semi-annual Networking Event 
November 2017

Mike Daniels, Executive Director
Federal Updates

• Uniform Guidance
  – Procurement and the Micro-purchase Threshold (MPT)
Federal Updates

• The MPT initially was $3,000, increasing to $3,500

• The National Defense Authorization Act (NDAA) increased the threshold to $10,000

• The Office of Management and Budget (OMB) may have a process for approval of the MPT to a higher level
Federal Updates

• Procurement by small purchase procedures (§200.320)
  – MPT threshold to the Simplified Acquisition Threshold ($150K)
  
  • *If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.*
Federal Updates

• Procurement by sealed bids (§200.320)

– *Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction.*
Federal Updates

• Procurement by competitive proposals (§200.320)

  – The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids.
Federal Updates

• Procurement by noncompetitive proposals (§200.320)

– Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when certain circumstances apply.
Federal Updates

• Federal Register Notice of May 17, 2017 confirms a one-year grace period for implementation of 2 CFR 200.317-326 (Procurement Standards)

  – For all non-Federal entities, there is an additional one-year grace period for implementation of the procurement standards in 2 CFR 200.317 through 200.326. This means the grace period for non-Federal entities extends through December 25, 2017, and the implementation date for the procurement standards will start for fiscal years beginning on or after December 26, 2017.
Federal Updates

• F&A in the news

– §200.56 Indirect (facilities & administrative (F&A)) means those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.
Federal Updates

• F&A in the news
  – Cautiously optimistic in turning back administration’s efforts to cut F&A rate to 10%
  – Combined efforts of: Council on Governmental Relations (COGR), the Association of American Universities (AAU), the Association of American Medical Colleges (AAMC), the Association of Public Land-grant Universities (APLU), the Association of Independent Research Institutes (AIRI), and the National Association of College and University Business Officers (NACUBO)
Federal Updates

• F&A in the news

  – F&A Primer
    http://www.cogr.edu/sites/default/files/1FA_2017_PRIMER.pdf
  – F&A Talking Points
    http://www.cogr.edu/sites/default/files/2FA%20Talking%20Points_0.pdf
  – Costs of Federally Sponsored Research
    http://www.cogr.edu/sites/default/files/Costs%20of%20Research%20Infographic%2020170523_0.pdf
Staffing Updates

• Welcome to Our New Staff
  – Zoe Sing, Senior Accounting Representative
  – Juan Jimenez, GCFA, Chicago

• Promotions
  – Jacky Sancen, Asst GCFA