

**Grant Coordinator Meeting  
September 14, 2017**

**Uniform Guidance (UG) – Updated Frequently Asked Questions (FAQ) – July 2017**

The Council on Financial Assistance Reform (COFAR) issued 24 new FAQs and revised 4 FAQs in July of 2017. This FAQ document is intended to provide additional context and guidance for understanding policies in the “Uniform Guidance,” at 2 CFR 200.

Most of the new information in the updated FAQs pertain to central administration (OSPA, OIPTT and SPA) activities. Noteworthy to all of campus is the revision to FAQ 200.110-6, which extends the grace period for compliance with the UG procurement requirements for another year. ISU will be required to comply fully with the UG procurement requirements in FY19.

[.110-6 Effective Dates and Grace Period for Procurement \\*\\*](#)

Will the Federal government provide a grace period after the effective date for non-Federal entities to comply with the procurement standards in the Uniform Guidance?

Yes, in accordance with the Federal Notice published May 17, 2017 (82 FR 22609), a grace period is allowed for three full fiscal years after the effective date of the Uniform Guidance. In general non-Federal entities must comply with the terms and conditions of their Federal award, which will specify whether the Uniform Guidance applies. However, in light of the new procurement standards, for procurement policies and procedures, for the non-Federal entity’s first full fiscal year that begins on or after December 26, 2014, the non-Federal entity must document whether it is in compliance with the old or new standard, and must meet the documented standard. For example, the third full fiscal year for a non-Federal entity with a June 30th year end would be the year ending June 30, 2018. The Single Audit Compliance Supplement will instruct auditors to review procurement policies and procedures based on the documented standard. For future fiscal years, all non-Federal entities will be required to comply fully with the uniform guidance.