



## Summary Resource • 2024 Uniform Guidance Update Overview

OMB revised the Uniform Guidance with the intention of:

1. Incorporating statutory requirements and administration priorities.
2. Reducing agency and recipient burden.
3. Clarifying sections that recipients or agencies have interpreted in different ways.
4. Rewriting applicable sections in plain language, improving flow, and addressing inconsistent use of terms.

In addition to the changes throughout 2 CFR 200, OMB also:

- Changed the name of Title 2, from “Grants and Agreements” to “Federal Financial Assistance”.
- Updated SAM.gov and Unique Entity Identifier (UEI) information (Part 25).
- Revised sections to align with authorizing statutes and clarifies subaward reporting requirements (Part 170).
- Revised section to align with authorizing statutes, and revised compliance plan and certification requirements (Part 175).
- Made plain language revisions (Parts 180, 182, & 183).
- Established Part 184 Buy America Preferences for Infrastructure Projects through a separate process.  
<https://www.federalregister.gov/documents/2023/08/23/2023-17724/guidance-for-grants-and-agreements>

Revisions are effective for all federal awards issued on or after October 1, 2024.

## Refer to Websites

For a complete description of the changes to 2 CFR, visit:

- OMB’s October 5, 2023, Federal Register notice at:  
<https://www.federalregister.gov/documents/2023/10/05/2023-21078/guidance-for-grants-and-agreements>
- OMB Blog Post Introducing Final Rule at:  
<https://www.whitehouse.gov/omb/briefing-room/2024/04/04/the-biden-harris-administration-finalizes-guidance-to-make-grants-more-accessible-and-transparent-for-families-communities-and-small-businesses/>
- 2 CFR 200 Federal Financial Assistance



## Summary of Significant Changes to 2 CFR Part 200

Subpart A 2 CFR 200.00	Subpart B 2 CFR 200.100	Subpart C 2 CFR 200.200	Subpart D 2 CFR 200.300	Subpart E 2 CFR 200.400	Subpart F 2 CFR 200.500
<ul style="list-style-type: none"> <li>▪ Removes acronyms that only appear once</li> <li>▪ New acronyms (200.0):                             <ul style="list-style-type: none"> <li>» Government Accounting Standards Board (GASB)</li> <li>» Notice of Funding Opportunity (NOFO)</li> <li>» Unique Entity Identifier (UEI)</li> </ul> </li> <li>▪ New definitions (200.1):                             <ul style="list-style-type: none"> <li>» Continuation funding</li> <li>» For-profit organization</li> <li>» Participant</li> <li>» Prior approval</li> </ul> </li> <li>▪ Expands and clarifies definition of questioned cost (200.1)                             <ul style="list-style-type: none"> <li>» Federal financial assistance</li> <li>» Improper payment</li> <li>» Indian Tribe</li> <li>» Questioned cost</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Agencies permitted to use a language other than English when appropriate (200.111)</li> <li>▪ Revises section on mandatory disclosures to better align with the FAR</li> </ul>	<ul style="list-style-type: none"> <li>▪ Clarifications on fixed amount awards (200.201)</li> <li>▪ Updates and expands Program Planning and Design (200.202)</li> <li>▪ Assistance listings must be in plain language (200.203)</li> <li>▪ Revises section on NOFOs to make them more accessible (200.204)</li> <li>▪ Clarifies that agencies should consider diversity in merit reviews (200.205)</li> <li>▪ Establishes risk assessment as a standard term, clarifies agency responsibilities (200.206)</li> <li>▪ Specifies that the terms and conditions of loans and loan guarantee programs must specify any continuing compliance requirements (200.211)</li> <li>▪ Certifications requirements (200.209)</li> <li>▪ Expands prohibition on certain communication and video surveillance services or equipment (200.216)</li> <li>▪ New section on Whistleblower Protections (200.217)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Requires recipient/subrecipient internal controls to include cyber security (200.303)</li> <li>▪ Flexibilities on interest (200.305)</li> <li>▪ Revises cost sharing including definition of (200.306)</li> <li>▪ Clarifies program income (200.307)</li> <li>▪ Combines budget/program plan requirements for construction &amp; non-construction awards (200.308)</li> <li>▪ Modifications to periods of performance (200.309)</li> <li>▪ Increases equipment threshold and allows Indian Tribes to dispose of equipment in accordance with tribal law (200.314)</li> <li>▪ Increases threshold on supplies (200.313)</li> <li>▪ Allows Indian Tribes to follow their own procurement standards (200.317)</li> <li>▪ Removes prohibition on geographic preferences for procurement (200.319)</li> <li>▪ Revises and clarifies procurement guidance (200.319 &amp; 200.320)</li> <li>▪ Adds veteran-owned business to types of businesses prioritized for procurement (200.321)</li> <li>▪ Clarifies reporting timelines and requirements (200.328 &amp; 200.344)</li> <li>▪ Add requirement for PTEs to confirm that subrecipients are not suspended/disbarred (200.332)</li> <li>▪ Raises the threshold on fixed amount subawards to \$500,000 (200.333)</li> <li>▪ Clarifies termination and closeout guidance (2 CFR 200.340 &amp; 200.344)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Removes 9 items from prior approval reqs (200.407)</li> <li>▪ De minimis rate increase (200.414)</li> <li>▪ Removes requirement that IDC rates must be publicly available (200.414)</li> <li>▪ Requires PTEs to certify to subrecipients that financial info submitted is complete and accurate (200.415)</li> <li>▪ Updates Interagency Service to align with new de minimis rate (200.417)</li> <li>▪ Removes requirement for IHE to submit DS-2 (200.419)</li> <li>▪ Revisions to general provisions for items of cost including:                             <ul style="list-style-type: none"> <li>» Advisory councils (200.422)</li> <li>» Compensation - Fringe benefits (400.431)</li> <li>» Conferences (200.432)</li> <li>» Entertainment and prizes (200.438)</li> <li>» Equipment and other capital expenditures (200.439)</li> <li>» Publication and printing costs (200.461)</li> <li>» Termination and standard closeout costs (200.472)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Raises audit threshold from \$750,000 to \$1,000,000 (200.501)</li> <li>▪ Revises responsibilities of federal agency (200.513)</li> <li>▪ Compliance testing must include transaction testing, other necessary auditing procedures, and provide sufficient evidence to support opinion (200.514)</li> <li>▪ Revises definition of known questioned cost and likely questioned cost (200.516)</li> <li>▪ Adjust thresholds for Type A programs to align with new audit threshold (200.518)</li> </ul>

The above is a high-level list of key changes - please refer to OMB's guidance for the definitive list and rationale for each update.

OMB revised the threshold and rates for several key elements. These apply to all grant awards issued on or after October 1, 2024.

Table: Threshold and Rate Changes			
Threshold/Rate	Location	Previously	As of the 2024 Update
Equipment threshold*	2 CFR 200.313	\$5,000	\$10,000
Supply threshold*	2 CFR 200.314	\$5,000	\$10,000
Fixed amount subaward threshold	2 CFR 200.333	\$250,000	\$500,000
De minimis rate (IDC)	2 CFR 200.414	10%	15%
Audit threshold	2 CFR 200.501	\$750,000	\$1,000,000
Modified total direct costs exclusion for subawards	Appendix III to Part 200 Appendix IV to Part 200	Above \$25,000	Above \$50,000

\*Guidance on the proceeds for selling unused equipment or supplies revised to refer to \$1,000 as amount recipients may be permitted to retain from Federal Share (was previously \$500 or 10 percent).

Most notably, OMB changed the title of Title 2 to Federal Financial Assistance. OMB updated the guidance using plain language principles, clarifying language and reducing jargon.

Table: Language Changes	
Previously	As of the 2024 Update
Grants and Agreements (Title 2 of CFR)	Federal Financial Assistance (Title 2 of CFR)
Federal awarding agency	Federal agency
Non-federal entity	Recipient (or subrecipient, as appropriate)
Cost share and match	Cost share (match is a type of cost share)
DUNS number	Unique entity identifier (UEI)
OMB designated government system	Using actual system name (i.e., SAM.gov, USAspending.gov, CPARS, Grants.gov)

**Prior approval** means the written approval obtained in advance by an authorized official of a Federal agency or pass-through entity of certain costs or programmatic decisions.

The updates to 2 CFR 200 remove the following items from the list of items requiring prior approval.

Table: Prior Approval (2 CFR 200.407)		
200.201 Use of grant agreements	200.438 Entertainment and prizes	200.456 Participant support costs
200.311 Real property	200.413 Direct costs	200.467 Selling and marketing costs
200.313 Equipment and other capital expenditures	200.454 Memberships, subscriptions and professional activity costs	200.470 Taxes (including Value Added Tax)