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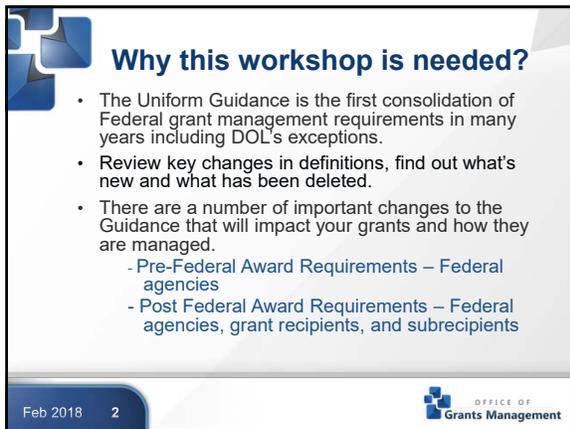
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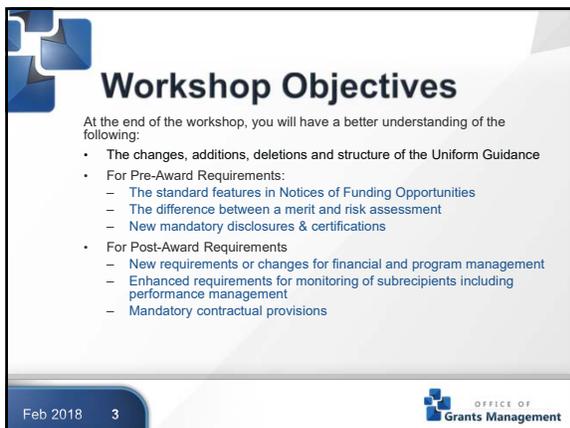
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## Knowledge Check

- On a scale of 1 (lowest) to 5 (highest), rate your knowledge and understanding of the following statements.
  - I am familiar with the significant changes made in the Uniform Guidance from the OMB Circulars and the Uniform Administrative Requirements.
  - I am fully aware of the standardized elements of the Funding Opportunity Announcements utilized by DOL-ETA.
  - I understand the various monitoring requirements for pass-through entities.
  - I am fully aware of the ten (mandatory) contractual provisions

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## Applicability

### UNIFORM GUIDANCE

**IMPLEMENTATION**

| US DEPARTMENT OF LABOR - ETA GRANT RECIPIENTS       | AFTER December 26, 2014             |                    |                 |
|---|-------------------------------------|--------------------|-----------------|
|   | Administrative Requirements         | Audit Requirements | Cost Principles |
| Governmental Organizations                          |                                     |                    |                 |
| Indian Tribes                                       |                                     |                    |                 |
| Nonprofit Organizations                             | 2 CFR Part 200 and 2 CFR Part 2900* |                    |                 |
| Institutions of Higher Education                    |                                     |                    |                 |
| Commercial For-Profit Organizations**               |                                     |                    |                 |
| Foreign Public Entities and Foreign Organizations** |                                     |                    |                 |

\* 2 CFR 200 contains the definition of these recipient types. In certain commercial for-profit entities and foreign entities. These commercial for-profit entities and foreign entities that are recipients of 200 must have applied to the uniform guidance.

| US DEPARTMENT OF LABOR - ETA GRANT RECIPIENTS | BEFORE December 26, 2014    |                        |                           |
|---|-----------------------------|------------------------|---------------------------|
|   | Administrative Requirements | Audit Requirements     | Cost Principles           |
| Governmental Organizations                    | 29 CFR Part 97 (A-102)      | 29 CFR Part 98 (A-138) | 2 CFR 225 (A-87)          |
| Nonprofit Organizations                       | 29 CFR Part 95 (A-110)      | 29 CFR Part 96 (A-138) | 2 CFR 200 (A-122)         |
| Institutions of Higher Education              | 29 CFR Part 95 (A-110)      | 29 CFR Part 96 (A-138) | 2 CFR 213 and 200 (A-121) |
| Commercial For-Profit Organizations**         | 29 CFR Part 95 (A-110)      | 29 CFR Part 96 (A-138) | 48 CFR 31.2               |

2 CFR 200 and 2 CFR Part 2900 may be found at [www.ecfr.gov](http://www.ecfr.gov).

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## Update

- COFAR issued a new set of FAQs (dated July 2017) for the Uniform Guidance
  - <https://cfo.gov/wp-content/uploads/2017/08/July2017-UniformGuidanceFrequentlyAskedQuestions.pdf>
- Final task before handing over responsibilities to the Chief Financial Officer at [www.cfo.gov](http://www.cfo.gov)

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**SMART**  
<https://grantsapplicationandmanagement.workforcegps.org/>

Strategies in navigating the administration of your grants around four themes: **M**onitoring, **A**ccountability, **R**isk Mitigation and **T**ransparency.

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**After Uniform Guidance**

- Achieves 9 Goals
  1. Eliminating duplicative and conflicting guidance
  2. Focusing on performance over compliance for accountability
  3. Encouraging efficient use of IT and shared services
  4. Providing for consistent and transparent treatment of costs
  5. Limiting allowable costs to best use federal resources
  6. Standardizing business processes using data definitions
  7. Encouraging family-friendly policies
  8. Strengthening oversight
  9. Targeting audit requirements on risk of waste, fraud, and abuse

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**Structure**  
 2 CFR Part 200 and 2 CFR Part 2900

- **Acronyms & Definitions**
  - Subpart A
    - New and updated terms
- **General Provisions**
  - Subpart B
    - Includes effective dates
- **Pre-Federal Award Requirements**
  - Subpart C
    - Appendix I – Full Text of Notice of Funding Opportunity
- **Post Federal Award Requirements**
  - Subpart D
    - Appendix II Contract Provisions

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**Structure (2)**  
2 CFR Part 200 and 2 CFR Part 2900

**Cost Principles**

- Subpart E & 7 Appendices
  - Appendix III — Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Institutions of Higher Education (IHEs)
  - Appendix IV — Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Nonprofit Organizations
  - Appendix V — State/Local Government wide Central Service Cost Allocation Plans
  - Appendix VI — Public Assistance Cost Allocation Plans
  - Appendix VII — States and Local Government and Indian Tribe Indirect Cost Proposals
  - Appendix VIII — Nonprofit Organizations Exempted From Subpart E — Cost Principles of Part 200
  - Appendix IX to Part 200—Hospital Cost Principles

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**Structure (3)**  
2 CFR Part 200 and 2 CFR Part 2900

**Audit Requirements**

- Subpart F & 2 Appendices
- Appendix X — Data Collection Form (Form SF–SAC)
- Appendix XI — Compliance Supplement

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**DOL Exceptions**

- The Department of Labor's (Department or DOL) adoption of the Office of Management and Budget (OMB) Guidance in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards is found at 2 CFR 2900.
  - ▶ *except to the extent that an agency can demonstrate that any conflicting agency requirements are required by statute or regulations, or consistent with longstanding practice and approved by OMB.*
    - 22 exceptions were approved for DOL

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**DOL Exceptions**

- **2900.2 Non-Federal Entity**
  - Applies to Commercial & Foreign Entities \*
- **Multiple Provisions Concerning Budget**
  - 30 days, in writing, and no blanket approval
- **2900.5 Federal awarding agency review of merit of proposals**
  - Findings outside of audits can be used during merit reviews and as questioned costs

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**DOL Exceptions (2)**

- **2900.7 Payment**
  - Advances must be liquidated and additional restrictions can be imposed.
- **2900.14 Financial reporting**
  - Expenditures must be reported on accrual basis
- **2900.15 Closeout**
  - All obligations and/or accrued expenditures must be liquidated at closeout.
- **2900.13 Intangible property**
  - Promote through free and open use of content on Creative Commons (applicable to discretionary competitive grant awards).

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**DOL Exceptions (3)**

- **2900.17 Adjustment of negotiated IDC rates**
  - Indirect Costs Rates may need to be renegotiated
- **2900.18 Contingency provisions**
  - Retention of records related to contingencies
- **Subpart F – Audit Requirements (2900.20-.22)**
  - Audit Resolution and Management Decisions
  - Clearly defined steps

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### How Did the Uniform Guidance Come About?



Council on Financial Assistance Reform (COFAR)



Conflicts between the OMB guidance and Federal agency regulations.



Created on October 27, 2011  
Composition  
- 9 Federal awarding agencies

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### Definitions and New Items



**Important additions or changes**

- Conflict of Interest
- Procurement Methods
- Support for Indirect Cost rates
- De Minimis Rate
- Computing Devices
- Internal Controls
- Improper Payments
- COSO

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### New Definitions (1 of 2)

- 200.8 Budget
  - DOL clarification at 2 CFR 2900.1
- 200.23 Contractor
- 200.45 Fixed Amount Awards
- 200.61 Internal Controls



**Non-Federal Entity-** For DOL grants at 2 CFR 2900.2 includes **for-profit and foreign Organizations**

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### New Definitions (2 of 2)

- 200.67 Micro-Purchase
- 200.68 Modified Total Direct Cost (MTDC)
- 200.69 Non-Federal Entity
- 200.79 PII and Protected PII
- 200.88 Simplified Acquisition Threshold
- 200.74 Pass-through Entity
- 200.92 Subaward



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### Pre-Award Requirements Subpart C

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### Notices of Funding Opportunity (1 of 2)

#### 2 CFR 200.203 Notices of Funding Opportunities

-  Must be written in English and provide timely notification to public
-  Link funds to a CFDA number, authorization, and type of assistance (formula or discretionary)
-  Describe program purpose, goals, measurement, and eligibility requirements

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### Notices of Funding Opportunity (2 of 2)

#### 2 CFR 200.203 Notices of Funding Opportunities

- Applicability of Single Audit requirements
- Reference to merit review process
- ETA term is "Funding Opportunity Announcement"

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### Merit Review vs. Risk Assessment Process (1 of 2)

#### Merit Review

- Specifies the criteria that the Federal awarding agency will use to evaluate all grant applications
- Appendix I of the Uniform Guidance provides additional detail

Applies to ETA discretionary awards

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### Merit Review vs. Risk Assessment Process (2 of 2)

#### Risk Assessment Process

- Conducted after the merit review but before Federal award is made
- Considers the following factors:
  - Financial stability
  - Quality of management systems
  - History of performance
  - Reports and Findings including Audits and Monitoring Reports
  - Ability to effectively implement requirements
  - FAPIS and SAM—for debarment or Do Not Pay listing

Applies to ETA discretionary awards

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## Federal Award Instruments

**2 CFR 200.201**

**Use of grant agreements, cooperative agreements, and contracts**

- Grant Agreement
  - Formula Grants
  - Discretionary (Competitive) Grants
  - Including Fixed Amount Awards
    - Not used in ETA grants
- Cooperative Agreement
- Contract
  - Is not a Federal award of assistance



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## Notice of Award Structure (1 of 2)

**STANDARDIZED**

Requirements found at 2 CR 200.210



**Standardized Elements**

- > Recipient name, period of performance, CFDA #, unique entity identifier, and more
- > Budget
- > Performance Goals
- > Terms and Conditions
- > Indirect cost rate including 10% de minimis rate
- > Match or cost sharing requirements
- > National policy requirements

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## Notice of Award Structure (2 of 2)

**Additional Elements**



- Requirements found at 200.208 & 200.113
- Certifications and Disclosures
  - To be submitted annually unless otherwise noted
  - Including written disclosure of all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award.

ETA's "Standard Terms and Conditions" can be found at [www.doleta.gov/grants/resources.cfm](http://www.doleta.gov/grants/resources.cfm)

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### Definitions

#### Pass-Through Entities

**2 CFR 200.74 Pass-through entity (PTE)**

- Means a non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program



**2 CFR 200.92 Subaward**

- Award provided by a pass-through entity to a subrecipient to carry out part of a Federal award



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### Subrecipients

#### Due diligence before the award

**Pass-through entity's internal controls system**

- Written procedures
- Evaluation factors for selecting subrecipients
- Conflict of interest provisions
- See "Procurement" module for more details on selecting subrecipients



**Risk assessment required 200.331(b)**

- Evaluate each subrecipient's risk of noncompliance for purposes of determining the appropriate subrecipient monitoring



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### Risk Assessment

**Required Factors**

- Prior experience with same or similar activities
- New personnel or new systems
- Results of Federal agency monitoring
- Results of previous audits



Other factors can be considered, such as history of late reporting, qualification of staff, or past performance



Need special conditions to the agreement?



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### Specific Conditions Needed?

**2 CFR 200.207**

**Special Conditions**

|   |  |   |                                      |
|---|--|---|--------------------------------------|
| Requiring more detailed financial reports | Requiring additional monitoring, training, or technical assistance | Operating in phases                     |                                      |
| Paying by reimbursements                  | Prompt removal when conditions corrected                           | Establishing additional prior approvals | Notification requirements 200.207(b) |

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### Subaward Terms and Conditions

**2 CFR 200.331**

**Requirements for PTEs**

|  |   |   |                                       |
|--|---|---|---------------------------------------|
| Identify agreement as subaward to subrecipient | Include required information: 13 provisions | Identify all Federal and PTE requirements | Access to records                     |
| Approved indirect cost rate if any             | Closeout and audit requirements             | Specific conditions per risk assessment   | Remedies for non-compliance (200.338) |

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### Reporting Requirements

**Considerations**

- Information you must report to ETA
  - Program income and leveraged resources
  - Accrued expenditures, unliquidated obligations, etc.
- Due dates: meet your own reporting deadlines
- Frequency: for effective grant management
- Additional data items?
  - To track program/financial performance
  - Costs by activities?
  - Budget and line item restrictions?

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### Status Check

Are the statements true or false?

- ? The pre-award requirements apply to both recipients and the Federal awarding agency.
- ? Performance is an integral part of the merit review process.
- ? ETA uses the term "Funding Opportunity Announcement" for all award solicitations. As issued, they will be available through grants.gov.

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### Post-Award Requirements Subpart D

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### Post-Award Requirements

- Specifies responsibility for Federal Agencies
  - Manage and administer awards
  - Ensure compliance with statutory and public policy requirements
- Specifies responsibility for Federal awardees
  - Must comply with all requirements
  - Manage and administer subrecipients

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### Standards for Financial and Program Management

- 200.300 Statutory and national policy requirements
- **200.301 Performance measurement**
- 200.302 Financial management
- **200.303 Internal controls**
- 200.304 Bonds
- **200.305 Payment**
- **200.306 Cost sharing or matching**
- 200.307 Program income
- **200.308 Revision of budget and program plans**
- 200.309 Period of performance.

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### Standards for Financial and Program Management (2)

- **200.300 Statutory and national policy requirements**
  - All Federal awards must be expended and in compliance with U.S. statutory and public policies
    - FFATA, salary limits, SAM, whistleblower protection and more
- **200.301 Performance measurement**
  - Require performance metrics/goals to improve program outcomes and use cost effective practices

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### Standards for Financial and Program Management (3)

- 200.302 Financial systems must provide:
  - Identification of all Federal cash receipts and expenditures
    - By CFDA title and number, grant number, year and name of entity awarding the funds
    - By obligations, unobligated balances, assets, income and interest
    - Accurate, current, and complete disclosure including accruals
  - Comparison of expenditures to budgets and performance
  - **Written procedures for payments and allowability of costs**

*States continue to follow their laws in expending federal awards*

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**Standards for Financial and Program Management (3)**

- 200.302 Financial systems must provide:
  - Identification of all Federal cash receipts and expenditures
    - By CFDA title and number, grant number, year and name of entity awarding the funds
    - By obligations, unobligated balances, assets, income and interest
    - Accurate, current, and complete disclosure including accruals
  - Comparison of expenditures to budgets and performance
  - **Written procedures for payments and allowability of costs**

*States continue to follow their laws in expending federal awards*

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**Internal Controls & Payments**

- 200.303 Internal controls
  - Must establish adequate internal controls using sound management practices that may include:
    - Standards for Internal Control in the Federal Government (Green Book) or "Internal Control – Integrated Framework (COSO)"
- 200.304 Bonds - No change
- 200.305 Payments
  - Incorporates IPERA improper payments requirements
  - Remittance of interest income of \$500 annually
  - DOL Exceptions 2900.6 and 2900.7
    - Impose restrictions on advances depending on specific conditions
    - Requires liquidation of existing advances before new request

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**Standards for Financial and Program Management (4)**

- 200.306 Cost sharing or matching
  - Higher standards for documentation
  - Must be verifiable through adequate records
  - 2900.8 DOL exceptions requires that contributions/funds received for match purposes must be expended on program purposes.
- 200.307 Program income
  - Addition method required for ETA grants (Deduction is default in Uniform Guidance)

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### Budget and Program Plans and Period of Performance

- **200.308 Revision of budget and program plans**
  - If Federal award is over the Simplified Acquisition Threshold, prior approval is needed for any cumulative change of 10% of the total budget
  - **2 CFR 2900.9-12 - DOL Exceptions**
    - No blanket approval
    - Submission 30 days before effective date
    - Must be writing
    - Only approving official is the Grant Officer
- **200.309 Period of performance**

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### Additional Post Award Requirements

- **Property Standards** 2 CFR 200.310-316
- **Procurement Standards** 200.317-326
- **Performance and Financial Monitoring and Reporting** 200.327-329
- **Subrecipient Monitoring and Management** 200.330-332
- **Record Retention and Access** 200.333 to 200.337
- **Remedies for Noncompliance** 200.338 to 200.342
- **Closeout** 200.343
- **Post-Closeout Adjustments and Continuing Responsibilities** 200.344 to 200.345

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### Property Standards

200.310-316

- Facilities and Lease Agreements
- Equipment
  - Including information technology systems
- Supplies
  - Including computing devices
- **DOL Requires Creative Commons Licensing for intangible property for discretionary (competitive) awards**
  - 2900.13

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**Procurement Standards**

- 200.317 to 200.326
  - **New or expanded items**
    - Micro-purchases
    - Conflict of Interest
    - Simplified acquisition threshold
    - Consultants
  - *States continue to follow state standards*
    - *Subrecipients of states follow the Uniform Guidance standards*

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**Procurement Standards**

- 200.317 to 200.326
  - **New or expanded items**
    - Micro-purchases
    - Conflict of Interest
    - Simplified acquisition threshold
    - Consultants
  - *States continue to follow state standards*
    - *Subrecipients of states follow the Uniform Guidance standards*

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**Contractual Provisions**

**200.326 Contract provisions**

- All contracts made must contain 10 possible contractual provisions at Appendix II
  - **Simplified acquisition threshold determines which provisions are applicable**
  - **December 19, 2014 Federal Register**
    - Contractual provisions from H to K are reordered and the Energy Policy and Conservation Act (42 U.S. 6201) is removed

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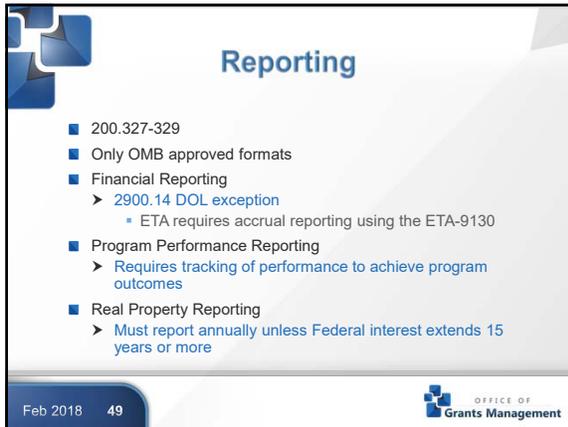
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**Reporting**

- 200.327-329
- Only OMB approved formats
- Financial Reporting
  - 2900.14 DOL exception
    - ETA requires accrual reporting using the ETA-9130
- Program Performance Reporting
  - Requires tracking of performance to achieve program outcomes
- Real Property Reporting
  - Must report annually unless Federal interest extends 15 years or more

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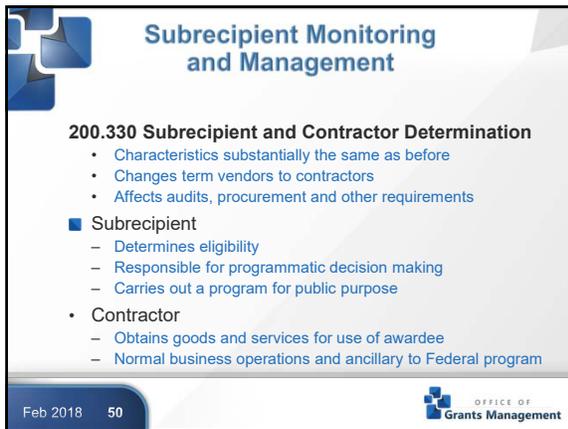
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**Subrecipient Monitoring and Management**

**200.330 Subrecipient and Contractor Determination**

- Characteristics substantially the same as before
- Changes term vendors to contractors
- Affects audits, procurement and other requirements

- Subrecipient
  - Determines eligibility
  - Responsible for programmatic decision making
  - Carries out a program for public purpose
- Contractor
  - Obtains goods and services for use of awardee
  - Normal business operations and ancillary to Federal program

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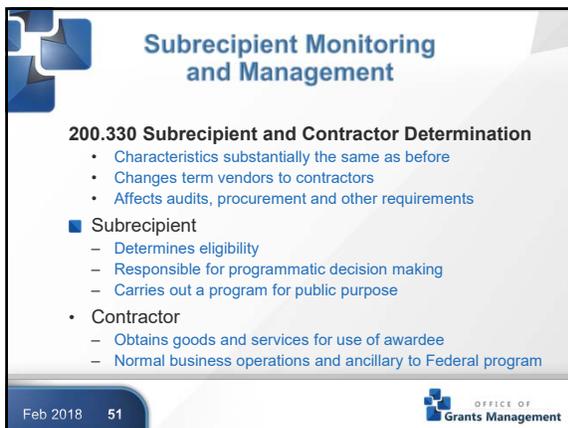
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**Subrecipient Monitoring and Management**

**200.330 Subrecipient and Contractor Determination**

- Characteristics substantially the same as before
- Changes term vendors to contractors
- Affects audits, procurement and other requirements

- Subrecipient
  - Determines eligibility
  - Responsible for programmatic decision making
  - Carries out a program for public purpose
- Contractor
  - Obtains goods and services for use of awardee
  - Normal business operations and ancillary to Federal program

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**Subrecipient Monitoring and Management (2)**

200.331-332

- Requirements for Pass-through Entities
  - Subrecipient monitoring tools & guidance
- Indirect costs guidance
- Pass-through Entities
  - Must use judgment based on criteria
  - Must classify each subaward as:
    - A Subrecipient
    - A contractor
- Fixed Amount Subawards – new provision

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**Subrecipient Monitoring and Management (3)**

- Ensure subawards appropriately identified
- Specifies required information for each award
  - Includes Federal Award Identification Number (FAIN) and DUNS numbers
  - CFDA Number and dollar amount of each
- Evaluate risk of non-compliance
- Monitor subaward activities
  - Specified actions
- Verify audit coverage as required

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**Records**

**200.333 Retention requirements for records**

- All retention requirements consolidated in one section
- Specifies length of retention
  - Financial records – 3 years or until all matters are resolved
  - Real property and equipment – 3 years
  - Program income expended post award – 3 years
  - Indirect cost rate proposals/cost allocation plans
    - 3 years but start date may differ
- Allows for transfer of records to awarding agency

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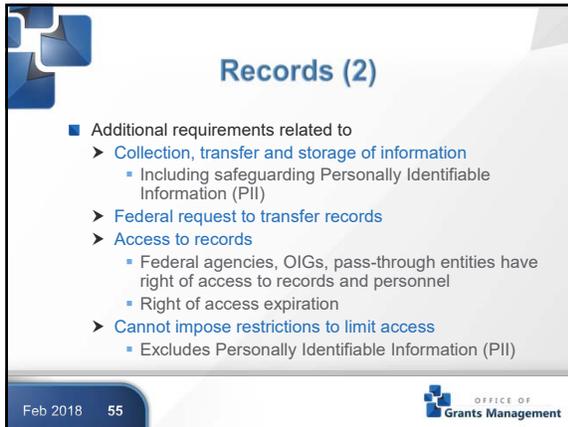
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**Records (2)**

- Additional requirements related to
  - Collection, transfer and storage of information
    - Including safeguarding Personally Identifiable Information (PII)
  - Federal request to transfer records
  - Access to records
    - Federal agencies, OIGs, pass-through entities have right of access to records and personnel
    - Right of access expiration
  - Cannot impose restrictions to limit access
    - Excludes Personally Identifiable Information (PII)

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**Remedies for Non-Compliance**

200.338 to 200.342

- Remedies for Noncompliance
  - Expansion of enforcement actions
  - Options to object, hearings and appeal
- Termination
  - Sets requirements for both termination for cause and for convenience
  - Notification of termination requirements
- Effects of Suspension or termination

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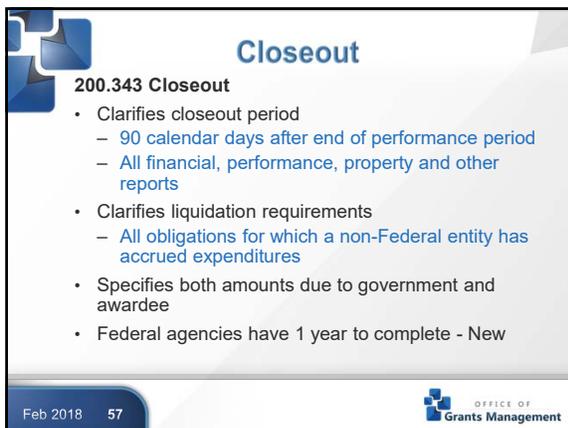
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**Closeout**

**200.343 Closeout**

- Clarifies closeout period
  - 90 calendar days after end of performance period
  - All financial, performance, property and other reports
- Clarifies liquidation requirements
  - All obligations for which a non-Federal entity has accrued expenditures
- Specifies both amounts due to government and awardee
- Federal agencies have 1 year to complete - New

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## Post-Closeout and Debt Collection

200.344-345

- Allows for disallowance and recovery of funds
- Specifies responsibilities for pass-through and subrecipients
- Debt Collection
  - 90 days of debt establishment
  - Administrative offset
  - Withholding advance payments
  - Application of interest charges

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## Knowledge Check

On a scale of 1 (lowest) to 5 (highest), rate your knowledge and understanding of the following statements.

1. I am familiar with the significant changes made in the Uniform Guidance from the OMB Circulars and the Uniform Administrative Requirements.
2. I am fully aware of the standardized elements of the Funding Opportunity Announcements utilized by DOL-ETA.
3. I understand the various monitoring requirements for pass-through entities.
4. I am fully aware of the ten (mandatory) contractual provisions.

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## Key Concepts

- The Uniform Guidance provides a consolidated and cohesive set of regulations that govern Federal awards
- Subpart C of the Guidance provides Pre-Award requirements or the requirements that apply prior to the issuance of an award document
- The former Uniform Administrative Requirements are consolidated into Post-Award Requirements and provide the framework for management of awards and subawards

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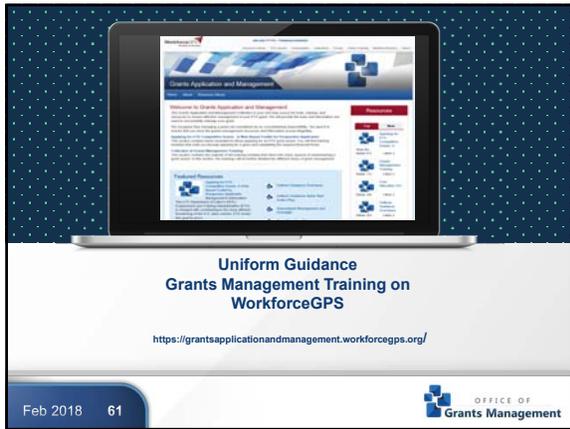
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