



Grants Innovation Exchange Session

Proposed Revisions to Title 2 Code of Federal Regulations

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Session Overview

- **Welcome**
- **Speaker Introduction**
- **Innovation Exchange Presentation**
- **Cross Agency Priority Goal 8: Results-Oriented Accountability for Grants**
- **Q&A**
- **Stay Informed!**





Speaker: Nicole Waldeck

Nicole Waldeck is a Policy Analyst with the Office of Management and Budget (OMB), Office of Federal Financial Management (OFFM). In this role, Nicole collaborates to provide government-wide policy on the award, administration, and management of Federal financial assistance. She leads government-wide initiatives to improve Federal financial assistance policies, processes, and systems while engaging with government and non-Federal stakeholders on key issues. Nicole is the OMB lead for the proposed revision to Title 2 of the Code of Federal Regulations and the Performance Workgroup for the Results-Oriented Accountability Cross-Agency Priority Goal for the President's Management Agenda.

Working in both the private and public sectors for over a decade, Nicole is passionate about improving government accountability, efficiency and transparency. Prior to OMB, Nicole worked at the Overseas Private Investment Corporation (OPIC) where she provided oversight of agency programs, performed budget formulation and execution activities, developed complex models, and lead agency initiatives. In the private sector, Nicole collaborated on Six Sigma process improvement projects and multifaceted analytical projects.

Nicole received her Master of Public Policy Degree from the Schar School at George Mason University and her Bachelor of Science Degree in Finance from the University of Central Florida. She is also a certified Project Management Professional (PMP). Nicole lives in Arlington, Virginia with her husband and dog Wrigley.





Results-Oriented Accountability for Grants

Proposed Revisions to the Code of Federal Regulations Title 2 Subtitle A- OMB Guidance for Grants and Agreements

Nicole Waldeck, OMB



Overview

The 2 CFR revision reflects the foundational shift outlined in the President's Management Agenda (PMA) to set the stage for enhanced result-oriented accountability for grants.

This guidance is the beginning of the Administration's pivot towards actions geared to focus on improved stewardship and ensuring that the American people are receiving value for money spent on grant programs.





Session Objectives

1. Learn about the proposed 2CFR revisions
2. Learn how to submit comments for the proposed revisions





Background

Why are we making the revision now?

1. *Guidance itself calls for lookback*
2. *Statutory requirements*
3. *President's Management Agenda initiatives*

How did we choose to which revisions to make?

The scope of the proposed revision was limited to (see preamble):

1. *To support implementation of the President's Management Agenda Results-Oriented Accountability for Grants CAP Goal and other Administration priorities*
2. *To meet statutory requirements and to align with other authoritative source requirements*
3. *To clarify existing requirements*





Title 2 Parts Proposed for Revision

- Part **25**: UNIVERSAL IDENTIFIER AND SYSTEM FOR AWARD MANAGEMENT
- Part **170**: REPORTING SUBAWARD AND EXECUTIVE COMPENSATION INFORMATION
- Part **183** (new section): NEVER CONTRACT WITH THE ENEMY
- Part **200** (Uniform Guidance): UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS





Helpful Information

Live share

1. How to access the Federal Register, submit a comment, and provide a comment in the requested format
 - Begin each comment with the section number in brackets. **For example; if the comment is on 2 CFR 200.1 include the following before the comment [200.1]**
 - <https://www.federalregister.gov/documents/2020/01/22/2019-28524/guidance-for-grants-and-agreements>
2. How to access the proposed revisions in tracked changes and sign up for the listening session
 - <https://www.performance.gov/CAP/grants/>





Proposed Revisions

Support implementation of the President's Management Agenda Results-Oriented Accountability for Grants CAP Goal and other Administration priorities

Some revisions include (see preamble for more details):

- Emphasizing stewardship and results-oriented accountability for grant program results
- Standardization of terminology and implementation of standard data elements
- Making indirect cost rate agreements transparent
- Strengthening merit review by requiring a merit review process for discretionary grants





Proposed Revisions

Meet statutory requirements and align with other authoritative source requirements

Some revisions include (see preamble for more details):

- Aligning 2 CFR to the Federal Acquisition Regulation (FAR) and the 2017 and 2018 National Defense Authorization Acts (NDAA) to raise the micro-purchase threshold from \$3,500 to \$10,000 and the simplified acquisition threshold from \$100,000 to \$250,000
- Aligning 2 CFR with the 2019 NDAA section 889, Prohibition on certain telecommunications and video surveillance services or equipment
- Aligning 2 CFR with the General Accepted Accounting Principles (GAAP), specifically the Government Accounting Statements Board (GASB) statement 68 and 45, related to pension costs and depreciation





Proposed Revisions

Clarifying existing requirements

Some revisions include (see preamble for more details):

- Codifying some frequently asked questions related to the prior release to 2 CFR
- Clarifying the responsibilities of the pass-through entity to address only a subrecipient's audit findings related to their specific subaward
- Clarifying the documentation requirement for using the de minimis indirect cost rate





Summary

1. **Major revisions to the guidance in the 3 scope areas:**
 - Support implementation of the President's Management Agenda Results-Oriented Accountability for Grants CAP Goal and other Administration priorities
 - Meet statutory requirements and to align with other authoritative source requirements
 - Clarify existing requirements

2. **Provide comments through the Federal Register:**
 - <https://www.federalregister.gov/documents/2020/01/22/2019-28524/guidance-for-grants-and-agreements>

3. **Sign up to attend the listening session on February 4th at 3:30pm at GSA:**
 - **Phone Participation:** <https://www.eventbrite.com/e/listening-session-proposed-revisions-to-title-2-cfr-phone-participation-tickets-89873186119>
 - **Attend In-Person:** <https://www.eventbrite.com/e/listening-session-proposed-revisions-to-title-2-cfr-in-person-attendance-tickets-89875482989>





Contact OMB with Questions

We are here to help!

Email us with your questions:

GrantsTeam@omb.eop.gov





OMB updates





Results-Oriented Accountability for Grants Cross Agency Priority Goal (Grants CAP Goal)

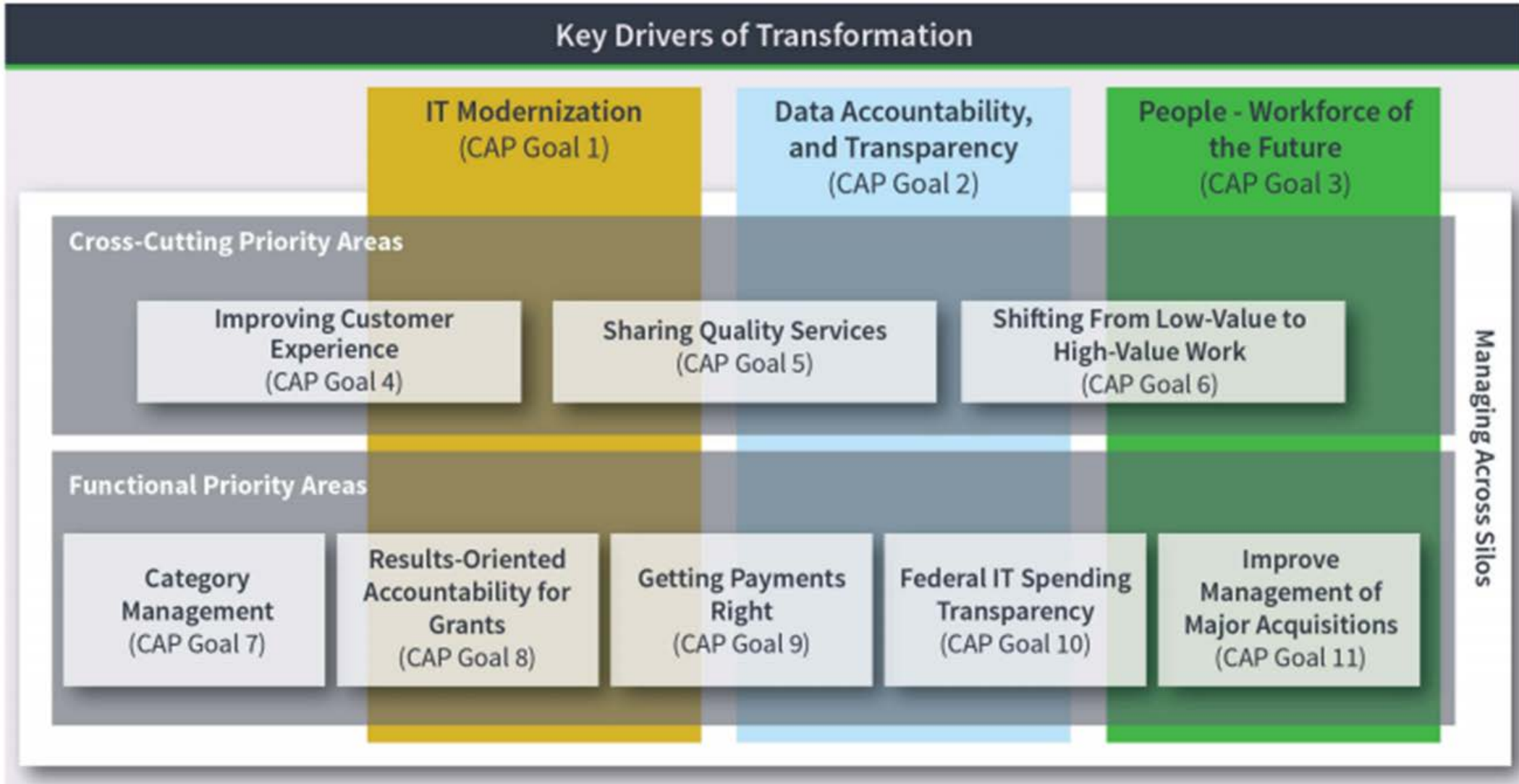
Maximize the value of grant funding by applying a risk-based, data driven framework that balances compliance requirements with demonstrating successful results for the American taxpayer.

GOAL STATEMENT





Cross Agency Priority Goal Environment





Grants CAP Goal Strategies

Hold recipients accountable for good performance practices that support achievement of program goals and objectives; & streamline burdensome compliance requirements for those that demonstrate results.



Achieve Goals and Objectives



Standardize Business Processes & Data

Standardize grants management business processes & identify, operationalize, standardize, & link data.



Build Shared IT Infrastructure

Use standard business processes & data to identify opportunities to build shared solutions that reduce burden & improve the user experience.



Manage Risk

Leverage data, including data from annual audits, to assess & manage recipient risk.



Instructions:

Please enter your questions via the chat feature via Adobe Connect; or

Email them to GrantsTeam@omb.eop.gov



Stay Informed

JOIN OUR COMMUNITY TODAY!

<https://www.performance.gov/CAP/grants/>

**Results-Oriented
Accountability for Grants**

NEWS & EVENTS RESOURCES **JOIN COMMUNITY**

NEXT INNOVATION EXCHANGE SESSION :

February 27, 2020

DO YOU HAVE AN INNOVATION YOU WOULD LIKE TO SHARE?

Please email the Grants Team at GrantsTeam@omb.eop.gov