

Area	Section	Major Impacts	Impacted Groups	Other Considerations
<b>Procurement Standards</b>	200.318-322	Increased requirements for smaller dollar purchases. Competitive analysis for items costing between \$3K and \$150K.	Purchasing, PIs, DAs	
<b>Award Close-out</b>	200.343	Strengthened enforcement of reporting deadlines including limitation of cash draws at day 91.	SPA, DAs, PIs	May need to shorten period of performance for subcontractors (could be detrimental to project)  Service center billings will need to be timely. (FisOps)
<b>Sub-awards and Sub-recipient Monitoring</b>	200.330-332	<ul style="list-style-type: none"> <li>• Contractor vs Subaward may be an issue for some agencies</li> <li>• New prior approval requirement for fixed price subs</li> <li>• New data elements required in sub-awards</li> <li>• More prescriptive risk assessment instructions</li> </ul>	SPA, DAs, PIs	
<b>Direct Charging of Admin/Clerical Salaries</b>	200.413	No longer examples of “major projects” – requirement for inclusion in budget and/or written federal agency approval.	NO significant change from current practice.	
<b>Computing Devices</b>	200.453	Computing devices may be direct charged without being “solely dedicated” to the performance of a federal award.	SPA (Internal Process Change only)	
<b>Fringe benefits – terminal leave payout</b>	200.431	Terminal leave payout should be charged as IC not DC.	FisOps, SPA	Potential Cost Accounting Standards Board Disclosure Statement (DS-2) change?

<b>Travel Costs</b>	200.474	Documentation must justify that “Participation of the individual is necessary to the Federal award”.	FisOps, SPA
<b>Cost-Sharing</b>	200.306	<ul style="list-style-type: none"> <li>• Stronger wording across agencies discouraging voluntary c/s. Will be prohibited for federal research proposals except where otherwise required by statute.</li> <li>• Specifies what should be included in indirect cost rate organized research base.</li> </ul>	SPA, FisOps, PIs, DAS
<b>Effort Reporting</b>	200.430	No changes needed – may wish to revisit later.	Current system meets the needs of this category.