UNIVERSITY OF ALASKA
UNIFORM GUIDANCE WORKING GROUP

Section Number & Name: 200.300 Statutory and national policy requirements
Old Language is difficult to compare

BACKGROUND INFORMATION:

A. Does the revised guidance contain new language? ☐ Y ☐ N

Specifically describe the new language and how it differs: See Attached

B. Is the new guidance more or less restrictive than university processes?
☐ More ☐ Less SIMILAR – No Change Required.

Specifically describe how it is more or less restrictive:

A majority of the language was taken from OMB Circular A-102 (vs A-110) because that language was deemed better able to mitigate the risk of waste, fraud, and abuse. UA's procurement policies and procedures actually include more internal controls than A-110, and are therefore consistent with the language in OMB A-102. No substantive changes required.

C. Cite any relevant system-wide policies/regulations/procedures:

Alaska Statute 36.30, State Procurement Code (AS 36.30)
BOR Policy .05.06, Procurement and Supply Management (BOR .05.06)
UA's Procurement Regulations and Procedures (UA PR&P)

D. Cite any MAU-level relevant processes or manuals:
UA PR&P

E. Is there an impact to electronic systems (Banner HR/Finance, Web Timesheets, Effort Reporting, etc.)? ☐ Y ☐ N

List specific system(s) impacted and method of impact:
N/A

ACTION PLAN: Is specific action needed? ☐ Y – see below ☒ N – no action needed

H:\Cost\OMB\OMB completed templates\Subpart D Post Federal Award Requirements Standards for Financial and Program Management 200.300 - 200.345\Word Documents\200.300.docx

UA Responsible area requiring documentation of compliance: Rosemary Madnick, Heather Paulsen, Barbara Hyde

200.300 Statutory and national policy requirements.

(a) The Federal awarding agency must manage and administer the Federal award in a manner so as to ensure that Federal funding is expended and associated programs are implemented in full accordance with U.S. statutory and public policy requirements: including, but not limited to, those protecting public welfare, the environment, and prohibiting discrimination. The Federal awarding agency must communicate to the non-Federal entity all relevant public policy requirements, including those in general appropriations provisions, and incorporate them either directly or by reference in the terms and conditions of the Federal award.

(b) The non-Federal entity is responsible for complying with all requirements of the Federal award. For all Federal awards, this includes the provisions of FFATA, which includes requirements on executive compensation, and also requirements implementing the Act for the non-Federal entity at 2 CFR part 25 Financial Assistance Use of Universal Identifier and Central Contractor Registration and 2 CFR part 170 Reporting Subaward and Executive Compensation Information. See also statutory requirements for whistleblower protections at 10 U.S.C. 2409, 41 U.S.C. 4712, and 10 U.S.C. 2324, 41 U.S.C. 4304 and 4310.