



Procurement Process Changes (effective July 1) due to Uniform Guidance

Uniform Guidance (“UG”) is a set of regulations (located at 2 CFR 200) that consolidates federal guidelines impacting research administration. Per the OMB website, this guidance “supersedes and streamlines requirements from OMB Circulars A-21, A-87, A-110, and A-122 (which have been placed in 2 C.F.R. Parts 220, 225, 215, and 230); Circulars A-89, A-102, and A-133; and the guidance in Circular A- 50 on Single Audit Act follow-up.”

Impact to the FAU Community

Since FAU has previously followed State/BOG regulations, changes to procurement practices should be minimal. FAU Procurement has partnered with the Office of Sponsored Programs (OSP) to collaboratively communicate and coordinate the execution of this new requirement.

New regulation became effective on July 1. Regulation affects all purchases with federal and federal flow-through dollars. The UG has changed the Micro-purchase Threshold (MPT) to \$10,000. This revised definition requires the following:

- Purchases between \$10,000 up to \$74,999 require two (2) written quotes
 - Quotes can be obtained online/websites, but must be written.
- Purchases \$75,000 and above require a sealed bid.

The new regulation has also limited the use of the Sponsored Research Exception (SRE) to include four distinct justifications. Those are:

1. Product/service is only available from a single source;
2. Public Emergency Procurement;
3. Federal Awarding Agency Authorization (the awarding agency specifically authorizes a non- competitive procurement after a written request from the Non-federal entity);
4. Inadequate competition after multiple attempted solicitations.

The SRE form has been revised to include these four items to ensure compliance with the regulation. The revised SRE is on the OSP website.

Procurement will help manage the sourcing, negotiations, and execution of purchasing research contracts and will modify competitive thresholds accordingly, as it applies to Uniform Guidance.

Any questions about the UG requirement can be directed to sponsoredprograms@fau.edu.

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