

A Runner's Guide to Uniform Guidance, Year Two

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As we begin the second year of Uniform Guidance, here's what we've learned from year one, and some strategies you can use to approach various challenges, all told from a runner's point of view.

A Runner's Perspective

As I began writing this article, the parallels between strategies that I use when competing in road races — and the strategies that we have used in navigating the Uniform Guidance — started to emerge. I've been running competitively for six years, and one of the biggest lessons I've learned is that implementing real-time adjustments to various challenges that pop up during a race makes all the difference between crossing — or falling short of — the finish line. This lesson also applies to implementing Uniform Guidance. On your mark, get set, go!

Challenge #1: Unclear Documentation

Federal awarding agencies have been unclear in the documentation within original awards, or funding increments, making it hard to know which standards to follow: the previous cost circulars, or the Uniform Guidance?

Racing Strategy: Navigate Decision Points

Take the time to ask for directions. In a long race, if you're apprehensive about what's ahead, stop and ask a volunteer at the water station, or anywhere else along the route. If there is a question about the route you need to take in order to remain compliant with the Uniform Guidance, it's your responsibility to reach out to the respective agency single audit coordinators or program officials. Unlike in a race, where you have to ask questions on the fly, it's best to document your Uniform Guidance questions and answers via email, and make sure to retain your documentation. Taking the time to make sure you're headed in the right direction will save you energy, and lost time, in the long run.

Challenge #2: Subrecipient Monitoring

The responsibilities of pass-through entities (PTEs) have significantly increased under the Uniform Guidance with respect to sub award requirements. Under OMB Circular A-133, the guidance was not very explicit on what monitoring procedures needed to be completed with regard to subrecipients. However, it was clear that monitoring to some extent was a requirement.

Racing Strategy: Keep a Healthy Pace

Take the role of “pacer” in your relationships with subrecipients. In a long-distance race, pacers ensure a fast time and avoid excessive tactical racing. By taking on this role, you can more efficiently fulfill your responsibilities under the Uniform Guidance.

Under the Uniform Guidance, a PTE must:

- Perform risk assessments on its subrecipients to determine where to devote the most time with its monitoring procedures.
- Provide ongoing monitoring, which includes site visits, provide technical assistance and training as necessary, and arrange for agreed-upon procedures to the extent needed.
- Verify subrecipients have been audited under Subpart F of the Uniform Guidance, if they meet the threshold.
- Report and follow up on any noncompliance at the subrecipient level.
- The time you spend determining the energy you need to expend, and the support you need to lend to your subrecipients will help your team perform at a healthy pace, and reach the finish line together.

Challenge #3: Procurement Standards

The procurement standards within the Uniform Guidance are similar to those under OMB Circular A-102, which applied to state and local governments. They are likely to have a bigger impact on those entities that were subject to OMB Circular A-110, which applied to higher education institutions, hospitals, and other not-for-profit organizations.

Racing Strategy: Choose the Right Equipment

Do your research before procuring goods and services. In the past, serious runners had limited options when it came to buying new shoes and food to boost energy. With the rise of e-commerce, we can now purchase everything faster and cheaper online than we can at our local running store. But is this really an improvement?

Under A-110, we were guided to make prudent decisions, but the requirements were less stringent. Now, under Uniform Guidance, we **must** follow prescribed guidelines. Summarized below are some of the differences between A-110 and the Uniform Guidance:

A-110	UNIFORM GUIDANCE
<p>Competition Procurement transaction shall be conducted in a manner to provide, to the maximum extent practical, open and free competition.</p>	<p>Competition Procurement transaction must be conducted in a manner providing full and open competition consistent with the standards of this section.</p>

A-110	UNIFORM GUIDANCE
<p>Procurement Organizations must establish written procurement procedures, which avoid purchasing unnecessary items, determine whether lease or purchase is most economical and practical, and in solicitation provide requirements for awards.</p>	<p>Procurement Organizations must use one of the methods provided in this section:</p> <ol style="list-style-type: none"> 1. Procurement by Micro Purchase (<\$3,000) 2. Procurement by Small Purchase Procedures (<\$150,000) 3. Procurement by Sealed Bids 4. Procurement by Competitive Proposal 5. Procurement by Noncompetitive Proposal

While the process is more stringent under the Uniform Guidance, you still have the opportunity to choose the vendor or product best suited to the job. Just make sure you have the documentation to back up your decision.

A Final Thought

Obviously, this article is not an all-inclusive list of the changes reflected in the Uniform Guidance. Yet we hope that it does provide direction as you look for new grant awards and revisit internal policies and procedures.

And here's one last tip: Do you know the most striking parallel that I see between running a race and implementing the Uniform Guidance? The value of knowing yourself. It's important to know what your challenges are, and to have the self-awareness to see when and where you will need help. And if you ever need someone to help you navigate, set the pace, or provide an objective perspective on purchasing equipment, let us know. We're with you all the way to the finish line.