

# The STRAIGHT and NARROW

# Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards at 2 CFR 200

By Rob Roy

Uniform Administrative  
Requirements, Cost  
Principles and Audit  
Requirements for Federal  
Awards

2 CFR 200

TITLE 2—Grants and  
Agreements

Sub title A—Office of  
Management and Budget  
Guidance for Grants and  
Agreements

## Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards at 2 CFR 200, Cont'd

There are new limits on fixed price contracts, and changes in payment requirements. Greater financial and programmatic performance monitoring is going to be required by the prime contractor. The changes will necessitate greater planning as contracting will be more constrained, purchasing will require more quotes and bids, and close out timelines will be more compressed.

Many researchers will want to know what impact the UR will have on their awards. The following are some highlights:

Proposals: The researchers will need to pay very close attention to the solicitation issued by the sponsoring agency. Cost sharing cannot be considered in proposal review and the requirement of cost share requires agency head approval. In short, do not propose cost share unless it is required in the solicitation. Awarding agencies are expected to pay the full negotiated F&A rate; any deviations must be approved by agency head and must be stated in the solicitation.

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## Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards at 2 CFR 200, Cont'd

IHEs should, if they have not already done so, map their policies and procedures to the new UR and conduct information sessions to advise faculty and staff that the new UR are applicable to awards made after 26 December, 2014. IHEs also need to be aware of agency specific requirements and exceptions to the UR that were published by each agency. Also, be aware that procurement requirements have been revisions

## Effective Management of Scholarship and Fellowship Funding Provided by a University Foundation

By: Mark W. Long, CPA, CGMA; Chief Financial Officer, Georgia Tech Foundation

Georgia Tech is fortunate to receive generous financial support from its alumni and friends to support scholarship and fellowship awards to our students. The contributions received may establish endowments, which provide a perpetual flow of income for student support, or the donor may m establish

## *International Fraud Awareness Week – A Success!*

Once again, the USG was a proud participant of International Fraud Awareness Week November 15 – 21, 2015. It was great to see all of the system wide activities that took place at institutions to bring awareness to the importance of an ethical culture. Studies have shown that organizations with an ethical culture are more productive and have higher employee retention rates. No organization is exempt from the potential for fraud and the resulting risk to the reputation of their employees. A recent survey by the Ethics Resource Center revealed that 41% of U.S. workers observed unethical or illegal misconduct on the job.

The USG Awareness programs that took place during International Fraud Awareness Week help to recognize and promote our shared values of *integrity, Excellence,*



## *The PCI Monsters under the Bed, Cont'd*

*Conduct an annual self assessment.*

*Have (clean) quarterly network scans by an Approved Scanning Vendor (ASV).*

The PCI Security Standards Council provides tailored guidance for the self assessment. The self assessment has two deliverables: the Self Assessment Questionnaire (SAQ) and the Attestation of Compliance (AOC).

There are:

SAQ – A: This is for card not present (e-commerce/ mail/telephone order) merchants, and all cardholder data functions are outsourced. This NEVER applies to face to face merchants.

SAQ – B: Imprint only merchants with NO electronic cardholder data storage, or standalone, dial out terminal merchants with no electronic cardholder data storage.

SAQ – C VT: Merchants using only web based virtual terminals, no electronic cardholder data storage

SAQ – C: Merchants with payment application systems connected to the Internet, no electronic card holder data storage.

SAQ – D: All other merchants not included in descriptions for SAQ types A through C and all service providers.

GSC will need an AOC for their school covering all areas that accept payment cards. Obtain a template at the Standards Council website: [www.pcisecuritystandards.org](http://www.pcisecuritystandards.org)

### II. PCI Monster 2: The Service Provider

Chances are, your school has outsourced some of their credit card processing operations

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There is a chance your institution may fall under several SAQ categories, thus you may need to complete multiple SAQs.



The Ins Yu Yon campus network engineering team must properly isolate PC traffic

Reference Information

2 CFR 200, U.S. Office of Management and Budget  
Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards

USG Information Technology Handbook  
[http://www.usg.edu/information\\_technology\\_handbook/](http://www.usg.edu/information_technology_handbook/)

PCI Compliance: Understand and Implement Effective PCI Data Security Standard Compliance,  
Edition 4, By Brian K. ...  
FD-1013-155  
TD130TD:0061T4E



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