

2021 WSFR National Virtual Federal Aid Coordinators Meeting

Questions and Answers (Q&A)

Topic/Speaker: Code of Federal Regulations Update on Policies and Changes to Title 2: Ryan Oster, WSFR Systems & Training Branch

1. Donna Morrow: Does a Federal Tax ID # constitute a "unique entity identifier"?

No. The unique entity identifier (UEI) is an identifier number currently assigned by DUNS and soon-to-be assigned through SAM.gov that is used to uniquely identify an entity doing business with the federal government as a contractor or recipient of financial assistance awards.

2. Corey Wentland: Will the DUNS number serve as the UEI, or will everyone who went out and got a DUNS number need to get a new UEI?

Existing entities with a DUNS will be automatically assigned a new UEI which will be displayed in SAM.gov. Learn more about the transition on the [GSA Unique Entity Identifier Update](#) website.

3. Amber Burns: Does and amendment for budget period spending have to be completed before the end of the budget period or within the POP?

2 CFR 200 does not speak to this. Recipients should consult with your WSFR Regional Office or other Federal awarding agencies for guidance.

4. Amber Burns: Do these requirements apply to all existing awards? or new awards after a certain date?

The Title 2 revisions apply to all awards issued on or after November 12, 2020, with the exception of the provisions at 2 CFR 200.216 and 200.340, which were effective as of August 13, 2020. These revisions may be applied to existing awards when amended by the Federal awarding program.

5. Amber Burns: by property do you mean any "goods"? or "real" property?

The procurement standards in 2 CFR 200.317 through 200.327 speak to non-Federal entity requirements to procure property and services under Federal financial assistance awards. 'Property' in these sections refers to real and personal property ([2 CFR 200.1](#) and [2 CFR 200 Subpart D – Property Standards](#))

6. Kate Pipkin: Can you provide a link to the federal site where I can download the updated 2 CFR 200?

All Federal regulations can be accessed through the Electronic Code of Federal Regulations at [ecfr.gov](#). Specifically, 2 CFR 200 is found at https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl.

7. Keren Dill: what are the 13 elements?

[2 CFR 200.332\(a\)\(1\)](#) lists the required elements that must be included in each subaward.

8. Matt Parsons: Is the 120 days only for grants that have passthrough? Or does this apply to all grants across the board.

According to [2 CFR 200.344](#), all recipients must submit, no later than 120 calendar days after the end date of the period of performance, all financial, performance, and other reports are required by the terms and conditions of the Federal awards. A subrecipient must submit to the pass-through entity, no later than 90 calendar days (or an earlier date as agreed upon by the pass-through entity and subrecipient) after the end date of the period of performance, all financial performance, and other reports as required by the terms and conditions of the Federal award.

9. Amber Burns: can you please tell us again the date the revisions were published? To be clear the reporting change is only for new awards, or awards amended after this date. Correct?

On August 13, 2020, the Office of Management and Budget published final revisions to Title 2—Grants and Agreements of the Code of Federal Regulations (2 CFR), revising existing 2 CFR parts 25, 170, and 200, and adding new part 183. They became effective on November 12, 2020 with the exception of the provisions at 2 CFR 200.216 and 200.340, which were effective as of August 13, 2020.

If desired, Federal programs may amend currently active awards with final reports due on or after November 12, 2020 to also allow those recipients 120 calendar days after the award period of performance end date to submit their final reports. Recipients should review their reporting periods and deadlines in GrantSolutions to see if this change was applied. Recipients may also request this change in final report due dates.

10. Amber Burns: what kind of extensions can be granted? Still one up to 90 days?

[2 CFR 200.344\(a\)](#) states that the Federal awarding agency or pass-through entity may approve extensions when requested and justified by the non-Federal entity, as applicable. FWS policy [516 FW 1](#), *Monitoring Financial and Performance Reporting for Financial Assistance*, remains unchanged. WSFR may approve one reporting due date extension for a maximum of 90 days past the original report due date, unless a longer period is justified by something that significantly impairs the recipient's operations (516 FW 1.13).

11. Jay Gutierrez: Example when period of performance and budget period have different start and end dates?

An example may be a recipient that has a 5-year grant award. In this case, the period of performance is 5 years. Within the period of performance, there may be individual budget periods established by the Federal awarding agency. For example, five 1-year budget periods. The Federal awarding agency may obligate funding for the first budget period and subsequent funding for the remaining budget periods is subject to

availability and successful performance by the recipient. Recipients may only expend Federal funds during each approved budget period unless the Federal awarding agency approves carry forward of those funds to subsequent budget periods.

In the mandatory WSFR programs (PR-DJ), Federal funds are generally obligated for the entire period of performance and not by budget period.

12. Mike Fujimoto: what are the 13 elements that need be included in sub award agreement?

[2 CFR 200.332\(a\)\(1\)](#) lists the required elements that must be included in each subaward.