

OMB Extends Super-Circular Compliance Deadline for Federal Grant Recipients

May 18, 2017

On May 17, 2017, the Office of Management and Budget (OMB) published a notice in the Federal Register stating that it will provide non-Federal entities that have been awarded federal grants with an additional one-year grace period to implement changes to their procurement policies and procedures, as required under OMB's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (commonly referred to as the "Super Circular"). The OMB Super Circular, issued in December 2013, is a government-wide guidance document for administering federal grants. In addition to requiring federal agencies to overhaul their grants administration policies, the Super Circular also created a number of compliance obligations for grant recipients. For example, it requires non-Federal entities receiving federal grant funding to maintain written standards of conduct, establish various acquisition procedures, and follow certain prescribed procurement methods. Agencies were originally required to comply with the Super Circular's requirements by December 2014, while grant recipients were given additional time. This latest extension provides non-Federal entities that are grant recipients, including colleges, universities, and non-profit organizations, with an additional year – until December 2017 – to comply.

Authors

John R. Prairie
Partner
202.719.7167
jprairie@wiley.law

Brian Walsh
Partner
202.719.7469
bwalsh@wiley.law

Kendra Perkins Norwood
Partner
202.719.7069
knorwood@wiley.law

Practice Areas

Federal Grants and Cooperative
Agreements
Government Contracts