

Understanding the Proposed Changes to 2 CFR 200 (Uniform Guidance)

REDD CAMPUS TOWN HALL | INFORMATIONAL OVERVIEW

JUNE 25, 2026

Why Do We Care

2 CFR 200 Affects

- Proposal development
- Award acceptance
- Budget preparation
- Allowable costs
- Subawards
- International collaborations
- Equipment purchases
- Travel
- Publications
- Compliance requirements

Why Faculty Should Care

These are **proposed**—
not final—changes to
federal grant rules.

They could affect
proposal preparation
and award
management.

Several provisions
could influence
collaborations and
compliance obligations.

What is 2 CFR 200?

Also known as: **Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (aka: Uniform Guidance)**

2 CFR 200 establishes the government-wide rules for:

- Federal grants
- Cooperative agreements
- Subawards
- Federal financial assistance

It governs:

- How awards are made
- How funds are spent
- What costs are allowable
- Reporting requirements
- Audits and compliance

Applies across virtually all federal agencies.

1. Proposed Rule Published

2. Public Comment Period

3. Agency Review of Comments

4. Final Rule Issued

5. Implementation

How Federal Rulemaking Work?

Current comment deadline: **July 13, 2026.**

Where Are We Today?

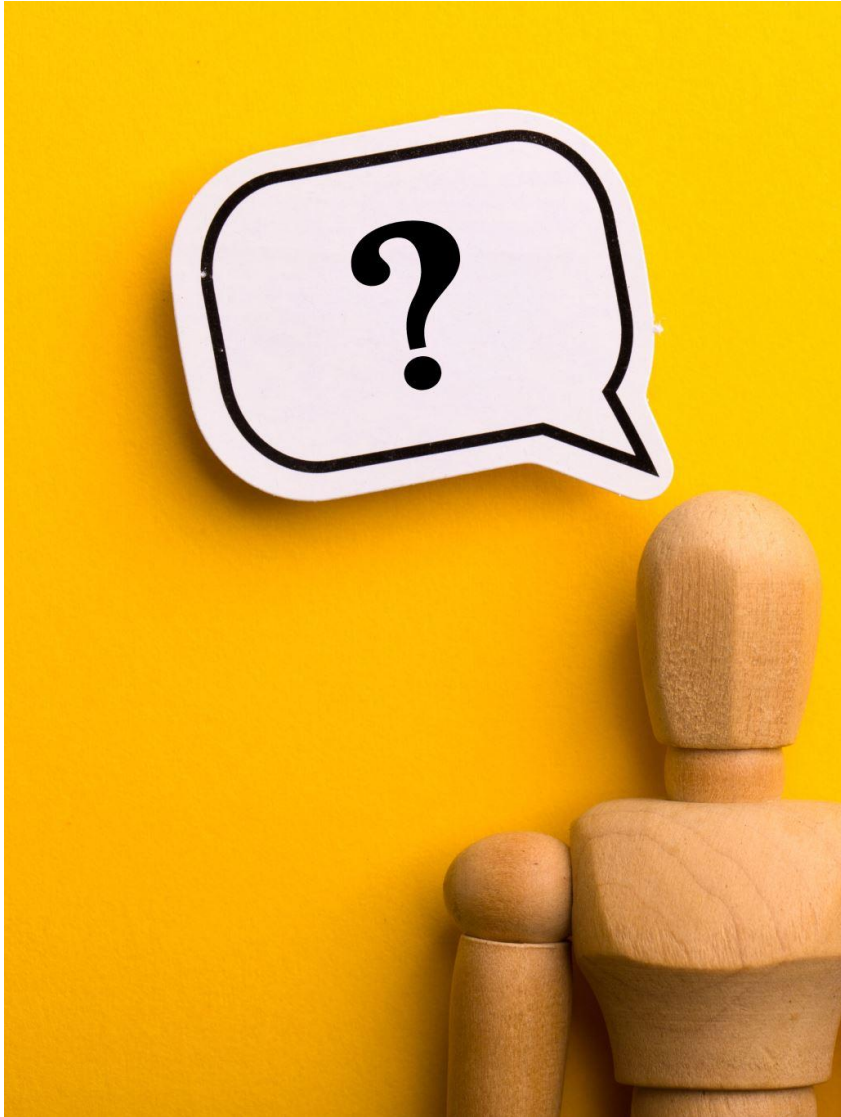
Proposed rule published **May 29, 2026**

Public comment period underway

Comments due **July 13, 2026**

Proposed effective date **October 1, 2026**

Final provisions may differ from the proposal currently under review.



Why Are Changes Being Proposed?

According to OMB, the proposed revisions seek to:

Improve transparency

Increase accountability

Strengthen oversight

Clarify regulatory authority (regulation, not guidance)

Reduce administrative burden

Why This Revision Is Receiving Attention

Goes beyond
routine technical
updates.

Includes expanded
agency discretion
and oversight
authority.

Touches merit
review,
certifications, and
policy compliance.

Major Proposed Changes

Converting	Converting the Uniform Guidance into a government-wide regulation ("Uniform Grants Regulation")
Expanding	Expanding federal agency oversight of funding decisions
Modifying	Modifying the role of merit review in award decisions
Broadening	Broadening agency authority to suspend or terminate awards
Adding	Adding new requirements related to Executive Orders and federal policy priorities
Increasing	Increasing oversight of foreign collaborations and subawards
Revising	Revising certain cost principles and administrative requirements
Establishing	Establishing new compliance, disclosure, and reporting requirements

Executive Orders

Executive Order	Title	Date Issued	Key Uniform Guidance Sections Affected
EO 14332	Improving Oversight of Federal Grantmaking	August 7, 2025	\$200.205, \$200.206, \$200.305, \$200.340, Subpart E
EO 14151	Ending Radical and Wasteful Government DEI Programs and Preferencing	January 20, 2025	\$200.300, \$200.204, \$200.205, \$200.206, \$200.218
EO 14173	Ending Illegal Discrimination and Restoring Merit-Based Opportunity	January 21, 2025	\$200.204-206, \$200.300
EO 14281	Restoring Equality of Opportunity and Meritocracy	April 23, 2025	\$200.218, \$200.300
EO 14168	Defending Women From Gender Ideology Extremism and Restoring Biological Truth to the Federal Government	January 20, 2025	\$200.300
EO 14187	Protecting Children From Chemical and Surgical Mutilation	January 28, 2025	\$200.300
EO 14149	Restoring Freedom of Speech and Ending Federal Censorship	January 20, 2025	\$200.219
EO 14319	Preventing 'Woke AI' in Government	July 23, 2025	\$200.202, \$200.300
EO 14292	Improving Safety and Security of Biological Research	May 5, 2025	\$200.205
EO 14303	Restoring Gold Standard Science	May 23, 2025	\$200.205

Source: Adapted from Attain Partners, “Uniform Guidance 2 CFR 200 – May 2026 Updates

Key Issues

Merit review and funding decisions

Political appointee role in decisions

Award suspension and termination authority

Can be done for not aligning with the administration priorities

Foreign collaboration oversight

More restrictions

Expanded agency discretion

Administrative burden and compliance costs

Potential Impacts for Researchers

Proposal Development

Additional certifications

Expanded disclosures

Collaboration review

Award Management

More reporting

Greater oversight

Potential delays



Questions & Discussion

1. Which proposed changes appear most likely to affect your research, collaborations, or sponsored projects activities?
2. What questions or areas of uncertainty would you like additional guidance on?
3. What tools, resources, or support would be most helpful from REDD if these changes are implemented?

Resources

AAU, APLU and COGR: [OMB Proposed Rule on Uniform Guidance: Immediate Considerations for Research Institutions](#)

[COGR Uniform Guidance Proposed Revisions](#), June 11, 2026 Slides

APLU [Key Issues within OMB Uniform Guidance Revision Proposal](#)

Ropes & Gary: [OMB Proposed Revisions to the Uniform Guidance: Key Takeaways for Award Recipient Organizations](#)