

Coalition of Higher Education Associations in Support of Grants Reform

February 21, 2020

Mr. Timothy F. Soltis
Deputy Controller
The White House Office of Management and Budget

Sent electronically: Timothy.F.Soltis@omb.eop.gov

Subject: Extension Request, OMB-2019-0005
Revisions to 2 CFR 25, 2 CFR 170, 2 CFR 183, 2 CFR 200
Federal Register/ Vol. 85, 3766-3809/ Wednesday, January 22, 2020

Dear Mr. Soltis:

The Higher Education community is enthusiastic about responding to OMB's proposed revisions to 2 CFR 25, 2 CFR 170, 2 CFR 183, and 2 CFR 200 (Federal Register/ Vol. 85, 3766-3809). This is an important initiative being led by OMB's Office of Federal Financial Management and has the potential to make a significant contribution to the quality and effectiveness of the research environment. We appreciate the opportunity to be valued partners with OMB on this initiative.

Our associations, on behalf of our Research and Academic Institutions, Universities, Hospitals, and Nonprofit Research Organization membership, **are requesting a 30-day extension—from March 23 to April 22**. Our longstanding and productive partnership always has been premised on serving the grantee community first. While we understand the sense of urgency OMB has to finalize the revisions, experience and precedent tells us that a 30-day extension to allow for more thorough and thoughtful comments will add value to the final product and allow for more productive coordination across the higher education community.

We can assure you that our approach is not to provide OMB with an exhaustive list of changes. Rather, our approach is to thoroughly review the proposed revisions for impact on burden, unintended consequences (which experience tells us is a critical exercise), and consideration of how the revisions intersect with both the balance of 2 CFR 200 and the July 2017 version of the FAQs. This is not a task to be taken lightly, and if we are given the opportunity to do the same quality review that we have done in the past, the entire grantee community, both federal and non-federal entities, will benefit.

As you indicate in the preamble to the revisions, *"Implementation of the Uniform Guidance became effective on December 26, 2014 ... and must be reviewed every five years in accordance with 2 CFR 200.109."* And as specified in 2 CFR 200.109, *"OMB will review this part at least every five years after December 26, 2013."* Even if OMB intends to be more agile in future revisions, it is not assured we will have the opportunity to comment until the year 2025—**our community feels strongly that our request for a 30-day extension is both reasonable and a wise investment to ensure the best version of 2 CFR Part 200 is provided to the community.**

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Thank you for your leadership on advancing these issues, which are of the highest priority for the research community. We look forward to working with OMB on this important project.

Sincerely,



Wendy D. Streitz, President
Council on Governmental Relations (COGR)



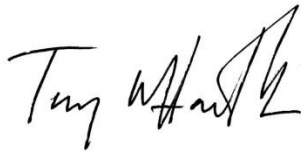
Peter McPherson, President, Association of
Public and Land-grant Universities (APLU)



Tony Mazzaschi, Chief Advocacy Advisor
Association of School and Programs
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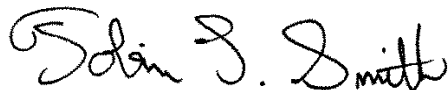
Liz Clark, Vice President, Policy and Research
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Terry Hartle, Senior Vice President,
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Ross McKinney, M.D., Chief Scientific Officer
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Cc: Gilbert Tran, OMB, Office of Federal Financial Management
Nicole Waldeck, OMB, Office of Federal Financial Management