

Changes to Federal Regulations May Impact Procurements

July 13, 2017: Update - OSU has delayed the implementation of the Uniform Guidance Procurement Standards until July 1, 2018 as provided by the waiver of the procurement rules stated in the Office of Management and Budget May 17, 2017 update.

June 29, 2017: Implementation of the Uniform Guidance Procurement Standards, 200.317 through 200.326 has been extended for another year. OSU will continue to delay the implementation of the Uniform Guidance Procurement Standards and follow guidance under the old standards until September 1, 2017 when OSU intends to implement the Uniform Guidance Procurement Standards.

October 27, 2015: Implementation of the Procurement Standards, 200.317 through 200.326 has been extended for one year. For OSU this means that the effective date will be July 1, 2017. During this grace period it is anticipated that the Institutes of Higher Education will engage with OMB to address issues such as the micropurchase level.

July 16, 2015: The Uniform Guidance Procurement Committee met for the first time on July 14th. There was a review of those areas of the Uniform Guidance Procurement Standards that impact OSU Procurement Standards and/or Policies. There was also discussion on decisions that will need to be made regarding the application of the Uniform Guidance on all types of procurements which would allow one set of procurement rules or just federally funded procurements which would require two sets of procurement rules. There was a [presentation](#) that guided the discussion.

May 4, 2015: A plan has been formulated to change the OSU Standards that pertain to Procurement so that OSU will be in compliance with the new Uniform Guidance. There will be an advisory committee chaired by the Chief Procurement Officer and comprised of representatives from Faculty, Capital Planning, Internal Audit, Compliance, General Counsel, Business Affairs, Procurement, Business Centers, Sponsored Programs, and Office of Post Award. The advisory committee will be tasked with the following:

- Developing an impact assessment review
- Giving input on key decision points
- Providing feedback as the OSU Standards are updated to be in compliance with the Uniform Guidance
- Gaining review and approval of the finalized proposed changes to the OSU Standards from the Executive Standards Review Committee
- Advising on changes to OSU procurement policies
- Providing input on training OSU staff
- Providing advice on ongoing communication about the changes

The Faculty Senate Executive Committee is being consulted with regard to how best to communicate to the faculty community who are potentially impacted by the Uniform Guidance as it applies to purchases at OSU.

February 11, 2015: As PaCS Policy, Oregon State University is delaying implementation of the Uniform Guidance pertaining to procurement as provided by waiver of procurement rules stated in COFAR FAQ, Section 110-6. The University will implement the new procurement rules July 1, 2016 and in the interim will follow the guidance under the old standards.

On December 26, 2013, the Office of Management and Budget (OMB) released its final guidance on the “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.” This guidance has been called the “Omni-Guidance” or “Supercircular” and supersedes previous OMB circulars. The area of Procurement is of particular concern to many impacted Universities as it requires significant changes to current university procurement policies and processes and is scheduled to become effective June 30, 2016. We will be reviewing the changes and how they impact current OSU Standards pertaining to Procurement as well as OSU Procurement policies.