

Proposed Revisions to Uniform Guidance (2 CFR Part 200)

UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

OMB has published a proposed rule titled "Regulation for Federal Financial Assistance" that would make significant revisions to the Uniform Guidance (2 CFR Part 200). The proposed rule was published in the Federal Register on May 29, 2026.

- The proposed rule is available at: <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance> or in the attached PDF.
- Current 2 CFR (Uniform Guidance): <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>
- These updates may have significant impact on federal financial assistance processes, and broad participation will help ensure that the final rule reflects practical insights from those who work with these requirements every day.

Summary of revisions that OMB proposes are:

- Requiring recipients and subrecipients to disclose whether any employee involved in preparing the proposal or supporting the award was employed by the awarding Federal agency within the prior two years.
- Eliminating fixed amount awards and subawards unless specifically authorized by statute.
- Removing explicit references to GAO/COSO internal-control frameworks and allowing recipients greater discretion in designing and documenting effective internal controls.
- Requiring recipients and subrecipients to use DHS E-Verify for employees and contractors hired in, or performing work in, the United States under a Federal award.
- Requiring states to conduct pre-payment verification checks through Treasury's Do Not Pay system or an alternative verification process.
- Requiring recipients to confirm in performance reports that all subawards issued during the reporting period have been reported to SAM.gov.
- Including standard termination provisions in Federal awards, allowing agencies to terminate for discretionary reasons when permitted by law.
- Clarifying that additional audits may only be imposed when authorized by statute, preventing agencies from adding audit requirements through regulation alone.

There is a 45-day comment period so please provide any comments back to TBR no later than **July 8th**.