

## Report on Research Compliance Volume 15, Number 10. October 31, 2018 NIH Confirms Increase In Micro-Purchases; Higher Levels Also Possible

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The NIH notice was typically mildly worded and succinct, revealing nothing of the angst and labor that led to the change being announced: “The purpose of this notice is to notify the extramural research community that on June 20, 2018, the Office of Management and Budget (OMB) issued a memorandum raising the threshold for micro-purchases under Federal financial assistance awards to \$10,000, and the threshold for simplified acquisitions to \$250,000 for all recipients,” the agency said on Aug. 28.

NIH added the new thresholds are “effective immediately” and that if “purchases were made using the higher thresholds prior to this notice, NIH will support the charges in accordance with the OMB memo.”

Yet, the announcement was the culmination of a multipronged effort launched after OMB issued its Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards nearly five years ago. The cost principles are also referred to as the uniform guidance (UG) for short. It folds into one set of requirements for those previously found in eight OMB circulars, including the A-110 and A-21(RRC 1/14, p. 1).

An important caveat: the UG applies only to awards, not to contracts, which are governed by the federal acquisition regulations. These have to be updated through the rule-making process. Changes have been cleared by the Federal Acquisition Regulatory Council but had not yet been published as of RRC’s deadline.

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