

Reference / subject	Change
§ 200.1 Subawards and MTDC	Redefine MTDC to include up to the first \$50,000 (previously \$25,000) of each subaward and exclude any amount in excess of \$50,000.1
§ 200.414 De Minimis Indirect Cost Rate	Increase de minimis rate from 10% to 15% over MTDC.2
§ 200.501 , § 200.512 Audit Requirements	Increase the single audit threshold from \$750,000 to \$1 million. Cognizant agency may authorize an extension for single audit submission.
§ 200.419 Cost Accounting Standards (CAS) and DS-2	Remove requirement for Institutions of Higher Education (IHE) that receive an aggregate total of \$50 million or more in Federal awards to file DS-2.3
§ 200.201 , § 200.313 , § 200.439 Equipment Capitalization	Increase threshold of equipment capitalization from \$5,000 to \$10,000.1,4
§ 200.333 Fixed Amount Subawards	Increase limit on fixed amount subawards from \$250,000 to \$500,000. Clarifies entitlement of unexpended funds.
§ 200.307 Program Income	Remove reference of deductive program income.
§ 200.1 , § 200.456 Participant Costs	Revise definition of 'participant': "An individual who is benefitting from or is otherwise playing a role in the overall program activities".
§ 200.407 Prior Written Approval Requirements	Remove prior written approval requirement from the following categories: use of fixed amount award, real property, equipment, direct costing of administrative staff⁵, entertainment costs, memberships, participant costs, selling and marketing costs, and taxes.
§ 200.403 (h) , § 200.472 (b) Closeout Costs	Allow applicable administrative closeout costs incurred until the due date of final report(s), instead of approved budget period, and charged to final budget period.

1 Change only applicable in conjunction with IHE's next indirect cost rate (IDC) proposal and effective with the new rates negotiated or negotiated as part of an indirect cost rate extension.

2 Recipient is authorized to determine the appropriate rate up to this limit.

3 Requirement remains for any IHE that has \$50 million or more in CAS covered contracts.

4 Recipient may elect to use lower threshold than \$10,000.

5 Removes requirement that administrative staff salaries be included in the budget and/or have prior written approval of sponsor agency.

*Chart of highlights is courtesy of Huron: <https://www.huronconsultinggroup.com/insights/omb-guidance-revisions>