

NHTSA
Regional Operations and Program Delivery
Grants Management and Oversight Guidance

Topic	Update to 2 CFR Part 200
Date of Issuance	October 23, 2024

On April 22, 2024, the Office of Management and Budget (OMB) released revisions to the OMB Guidance for Grants and Agreements, now called the OMB Guidance for Federal Financial Assistance (FFA). NHTSA is releasing this document to provide clarification where NHTSA-specific interpretation or application is needed. This document addresses topics most likely directly impacting all State Highway Safety Offices. States and subrecipients remain responsible for being familiar with and following all Supercircular requirements. If you have specific questions about how a provision applies to your grant, please contact your Regional Program Manager.

See: <https://www.federalregister.gov/documents/2024/04/22/2024-07496/guidance-for-federal-financial-assistance#p-4>

Effective Date

The revisions to the Supercircular are effective for Federal awards issued on or after October 1, 2024. For NHTSA's highway safety grants and penalty transfer programs, the revisions apply to FY 2025 awards and later. States must take the new Uniform Guidance changes into account when developing FY 2025 and future year agreements and when updating highway safety policy and procedure manuals.

Section 200.414 Indirect Costs

OMB raised the de minimis indirect cost rate from 10% to 15% of modified total direct costs. (2 CFR 200.414(f)) OMB also revised the definition of modified total direct costs (2 CFR 200.1) to increase the threshold for the portion of subawards that may be included from \$25,000 to \$50,000. If a State has a current existing negotiated indirect cost rate, it must continue using that rate until its expiration.

Section 200.439 Equipment and Other Capital Expenditures

OMB raised the threshold value for equipment from \$5,000 to \$10,000. On July 15, 2024, NHTSA issued a technical amendment to update the monetary threshold for equipment at 23 CFR 1300.31(d) for State highway safety grant programs from \$5,000 to \$10,000 to conform with the updated OMB rules. As a result of this threshold increase, States will no longer have to seek pre-approval to purchase or dispose of equipment between \$5,000 and \$9,999.99. In addition, States will no longer have to apply the heightened rules for equipment use and management for items under \$10,000. However, States should be aware that they must continue to meet all State rules for equipment, as defined by the State.