2026 Uniform Guidance Proposed Changes

UNC School of Government

Zoom Chat and Q&A

September 18, 2026

Chat Comment from NCACC: If any counties have technical assistance needs, please reach out via email at lacy.pate@ncacc.org.

Chat Comment from NCLM: Cities with questions regarding grants can reach out to Chris Nida at cnida@nclm.org.

Q: More of a concern going forward than a question expecting an immediate answer: Do we expect the "amended" in the language of "made and amended" for awards in FY2027 to include changes in obligation amounts for existing awards? (Thinking mainly about our FEMA PA projects)

A: Good point--I don't have an answer and I don't think the proposal provides much either, but appreciate you flagging this.

Q: How does this affect putting the statement about HUB businesses encouraged in RFQs/RFPs? Isn't this a state law?

A: I will chat about this when I come back on, but also wanted to make sure you know about this: https://canons.sog.unc.edu/blog/2026/07/08/budget-bill-eliminates-hub-office-and-repeals-statutory-hub-language/.

Q: Would those restrictions flow down to health insurance for contractors or only direct spending?

A: Good question--we will look into this.

Q: Where may we find a list of the President's policy priorities?

A: There is no specific list of policy priorities. Some of the priorities have been included in the UG update, such as prohibiting federally funded DEI activities. Certain other priorities are referenced in various executive orders, but one challenge is that this area is unclear.

Q: Do they look at the staffing requirements also for capacity?

A: Yes, an agency can assess staffing when it bears on the applicant's ability to successfully administer an award. There is no minimum number of staff needed, but an agency will consider all your capabilities in evaluating your organization.

Q: Does the elimination of HUB extend to HUD dollars? The HUD Public Housing Procurement Handbook refers to 2 CFR 200.321. We are currently working on a procurement for consulting services related to our public housing portfolio. I'd be happy to discuss offline as well. :)

A: I will be talking about 200.321 in a moment. But you can think of these requirements as related, but separate. While compliance with HUB has historically satisfied 200.321, the elimination of HUB has no effect on 200.321. I think what it does mean is that you probably need to pay more attention to 200.321 since you won't be doing HUB any longer and making sure you are doing what's needed there--for now. 220.321 is proposed to be amended. I'll try to explain this live, too.

Q: Does the change to conference costs also apply if the awardee is HOSTING a conference?

A: We will try to figure that out!

Q: Assume programs with income limits not related to program participants' protect class status are not impacted (such as HUD MID requirements)?

A: Assume so, too!

Q: To be clear regarding 2 CFR 200.454 requiring "subscriptions" to be approved by the federal agency in advance, I do not think this would apply to "subscriptions" for software, e.g. software as a service (SAAS). Software/SAAS is a common expenditure, and it is typically treated as "equipment" or "supplies" under the Uniform Guidance.

A: Correct. Subscriptions applies more generally to publications, like journals and magazines. Software that is paid on a subscription basis is difference.

Q: Are cost-plus contracts still prohibited?

A: Yes

Q: How is discretionary termination different from termination for convenience?

A: Good point. Philosophically, probably not much different. Not all contracts include TFC though.

Q: So if the national interest changes can they terminate while the grant project is still being carried out?

A: That seems to be the case. There are some notice and appeal rights.

Q: Is a CPF grant discretionary?

A: I don't know the ins and outs of CPF--is that Community Project Funding? If the application is voluntary and HUD can award based on the application (or not), then I think it would be considered discretionary. Because it’s congressionally directed, I assume those would not be discretionary, then, but HUD would be in the best position to confirm.

Q: Does the "reputational harm" related only to situations, employees, events etc directly funded by the federal funds or is it relating to actions of the subrecipient as a whole?

A: I think that this is unclear, but it could definitely implicate actions as a whole, not just individuals.

Q: Can we get an updated comparison chart for State vs. Federal procurement when these changes are implemented?

A: Yes!

Q: Could you elaborate on the definitions for "fixed price costs" re: cost reimbursement contracts and "fixed amount" subawards. It sounds like fixed price contracts are highly encouraged, but "fixed amount" subawards are prohibited.

A: A fixed-price contract is a procurement contract with a vendor or contractor. The contractor agrees to provide specified goods or services for an agreed-upon price. Payment is based on the contract price rather than reimbursement of the contractor's actual costs. The proposed Uniform Guidance strongly discourages cost-reimbursement contracts, under which the contractor is reimbursed based on its actual allowable costs. This is the preferred method for a contract so that the recipient knows exactly how much it will pay out under the contract. A fixed-amount subaward, on the other hand, is not a procurement contract. It is a form of financial assistance provided by a pass-through entity to a subrecipient. A fixed-amount subaward can provide an agreed-upon amount based on performance and achievement of specified milestones rather than reimbursement of the subrecipient's actual costs. The subrecipient is carrying out the terms of the award, and there is more oversite when there is a reimbursement subaward instead