



Cornell University

Division of Financial
Affairs

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To: Thomas Romantic
Sr. Director of Procurement and Business Services

From: Jeffrey Silber 
Sr. Director, Sponsored Financial Services

Re: Implementation of Procurement Provisions of 2 CFR 200, Uniform Guidance

As permitted under the rule published at 82 FR 22609, the Ithaca-based divisions of Cornell University are electing to defer until July 1, 2018 the implementation of the procurement provisions of the Uniform Guidance, as detailed in 2 CFR 200 subsections .317 through .326. During this period we will continue to operate under the guidance of OMB Circular A-110, subsections .40 through .48.

This memo shall constitute the documentation of this decision as required, and shall be deemed incorporated into our internal procurement policies.

cc: Gerald Hector, VP Finance