

# OMB Delays Procurement Rules for One More Year



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Policy

## OMB Delays Procurement Rules for One More Year

### Resources

[2 CFR 200 \(Uniform Guidance\)](#)

[Uniform Guidance FAQ](#)

[NAFOA's Webinar on Procurement](#)

### Best Practices

Maintain written internal procurement policies to reflect the changes described in the Uniform Guidance.

Last week the Office of Management and Budget (OMB) announced there will be an additional one-year grace period to implement procurement standards set forth in the [Uniform Guidance](#) for tribal governments and other non-federal entities. The new extension goes through December 25, 2017.

If your tribe elects the grace period option, you must document this within your internal procurement policies by having a written document from management or a tribal council resolution in place.

### What does this mean for my tribe?

**My tribe has already implemented the new procurement standards, how does this affect us?**

- There will be no change. Your audits will be tested using the procurement policy that has been

Ensure your tribe's current employee conflict of interest policies include required language.

Ensure the mandatory organizational conflict of interest policy is written, if applicable.

Review Appendix II to ensure your tribe's contracts include the required specifications, or [search for vendors on the SAM](#) .

implemented and its applicability to the Uniform Guidance.

**My tribe has not yet implemented the new procurement standards, how should I prepare?**

- Your tribe should start reviewing the procurement changes and determine if electing the grace period instead of implementing the new standards is appropriate. [Review NAFOA's recorded webinar](#) and other materials on this topic. If your tribe elects the grace period that goes through December 25, 2017, you should follow your policies currently in place. Be sure to document that you are electing to delay in your procurement policies. Your audit for calendar year 2016 and 2017 and fiscal year 2018 will test your existing policies.

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