



Cornell University

Division of Financial  
Affairs

**Jeffrey A. Silber**  
Senior Director

Sponsored Financial Services  
341 Pine Tree Road  
Ithaca, New York 14850-2820  
t. 607.255.2016  
f. 607.255.0327  
e. [silber@cornell.edu](mailto:silber@cornell.edu)

May 18, 2017

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