

## 85 FR 49522 SYNOPSIS OF CHANGES TO 2 CFR 200

In the Federal Register of 13 AUG 2020, OMB made significant changes to 2 CFR 200. All but two of these changes are effect 12 NOV 2020. Changes to §§200.216 and 200.340 are effective 13 AUG 2020.

### SUBPART A

#### ACRONYMS

*CFDA Catalog of Federal Domestic Assistance* is deleted. (No replacement is offered, but the replacement *concept* is 'Assistance Listings,' which appears as a new definition.

*MTDC* and *SAM* are said (in the FR) to be amended, but neither I nor Word's Compare function can detect any differences. Go figure.

*NFE Non-Federal Entity* is added.

No other changes.

#### DEFINITIONS

Where the previous edition of 2 CFR 200 numbered each definition, all numbering has been eliminated. Alphabetical ordering has been corrected in the few cases where definitions were listed out of alphabetical order. Internal references (within 2 CFR 200) have been shortened, and some punctuation/capitalization has been revised, without any material effect to meaning.

Deletions/additions are as follows.

*Assistance listings*, *Assistance listing number*, and *Assistance listing program title* have been **added**. These definitions replace references in the earlier edition to the CFDA.

*CFDA* and *CFDA title* have been **deleted**. This replacement is discussed above.

*Budget period* has been **added**. This addition is central to changes in § 200.308 that provides for disaggregation of budget periods within the overall period of performance. This could clarify financial reporting for recipients who receive funds from agencies that have typically compartmentalized budget tranches in this way. On the other hand, it could complicate things for recipients who haven't previously been required to make this distinction between budget period and performance period.

*Capital assets* had been **amended**, significantly clarifying the meaning of this term. Accountants will know how to deal with this.

*Central service cost allocation plan* has been **added**. This is applicable only to State and local governments and Indian tribes.

*Compliance supplement* has been **reordered**.

*Contract* has been **amended**, clarifying it somewhat for Federal purposes.

*Cooperative agreement* has been **amended**, bringing somewhat greater clarity to this term.

*Cost sharing or matching* has been **amended** to add clarity.

*Cross-cutting audit finding* has been **amended** to add clarity.

*Discretionary award* has been **added**. I don't think the idea is new. But now it has a name.

*Federal Audit Clearinghouse (FAC)* has been **amended** for simplicity.

*Federal financial assistance* has been **amended**, adding language regarding non-Federal entities that is particularly important to understanding the prohibition on certain telecommunications and video surveillance services or equipment imposed by § 200.216. (see notes under Subpart C.)

*Federal interest* has been **amended** for clarity.

*Federal program* has been **amended**. This is where *CFDA* is first replaced by *Assistance Listings Number*.

*Financial obligations* has been **added**. This is simply a re-naming of the previous edition's § 200.71, *Obligations*. See below.

*Foreign public entity* has been **reordered**.

*Grant agreement* has been **amended** for clarity.

*Highest level owner* has been **added**. I think this is important when deciding who not to buy from.

*Improper payment* has been extensively **amended** for clarity. This has import in audits.

*Internal controls* has been **amended**, subsuming language previously found in the previous edition's definition of *Internal control over Federal awards* which has been **deleted**.

*Management decision* has been **amended** for clarity.

*Micro-purchase threshold* has been **amended** for clarity and to allow for greater flexibility by recipients in establishing this threshold, as detailed in § 200.320.

*Non-discretionary award* has been **added**. See *Discretionary award*, above.

*Notice of funding opportunity* has been **added**. This clarifies usage of the term, which is elaborated in § 200.204 (new edition; previously § 200.203).

*Obligations* (previous edition § 200.71) has been **deleted**, as its language is now found in the definition for *Financial Obligations*, see above.

*Oversight agency for audit* has been **amended**, expanding the language here to clarify usage in § 200.510.

*Period of performance* has been **amended**. Language added here completes the separation of budget period from performance period. See Budget period, above, and § 200.211 (new edition).

*Program income* has been **amended**, adding a reference to the definition of *Period of performance*, which helps to clarify the requirements of § 200.307(f).

*Questioned cost* has been **amended** to add language clarifying that a questioned cost is not an improper payment until the awarding agency has reviewed and confirmed it as such.

*Recipient* has been **amended** for greater clarity. Added language makes it clear (?) that while recipients are usually non-Federal entities, they are not necessarily so. See *Subrecipient*, below.

*Renewal award* has been **added**. I suppose this gives some clarity to program extensions.

*Simplified acquisition threshold* has been **amended**. Added language clarifies that recipients may set their SAT lower than the Federal SAT, but never higher.

*Subrecipient* has been **amended** for greater clarity. Added language makes it clear (?) that while subrecipients are usually non-Federal entities, they are not necessarily so. See *Recipient*, above.

*Subsidiary* has been **added**. I think this is important when deciding who not to buy from. See *Highest level owner* above.

*Telecommunications cost* has been **added**. This is necessary to prohibition on certain telecommunications and video surveillance services or equipment imposed by § 200.216.

*Termination* has been amended to add the clarification that “a lack of available funds is not a termination”.

*Unliquidated financial obligations* has been **amended**, though it’s only to add ‘financial’ to the term. (Previously, this term was called *Unliquidated obligations*.)

## SUBPART B

**Blablabla**

### **§ 200.101 Applicability.**

The text from 2016 editions paragraph (c) has been moved up to become 2020’s (a)(2). No change in meaning.

Language clarifying the use of the words *must*, *should* and *may* has been added (paragraph (b)(1)).

Changes to the applicability table are all cosmetic.

Otherwise, changes merely clean up the language for greater clarity.

### **§ 200.102 Exceptions.**

Paragraph (d) has been greatly simplified. No substantive change in meaning that I can see.

**§ 200.105 Effect on other issuances.**

Added a new paragraph (b) that seems to suggest that agencies must use the notice and public comment process in order to impose legally binding requirements on recipients. But then apparently, they can bypass this by putting such requirements in the terms of the award agreement. So watch yourself.

**§ 200.110 Effective/applicability date.**

Cleaned up paragraph (a) by deleting outdated language pertinent to the original (2014) implementation of 2 CFR 200.

Replaced outdated 2014 paragraph (b) with new language stating that existing NICRAs negotiated under the old rules remain in effect until they expire or are renegotiated in the normal course of business. When renegotiating the NICRA, the new requirements for indirect rates in this 2020 edition will apply.

**§ 200.113 Mandatory disclosures.**

New language added to the 2016 text invoking the new language at appendix XII and requiring non-Federal entities to report certain proceedings to SAM (currently FAPIIS)".

**SUBPART C**

**§ 200.200 Purpose.**

2016 edition's paragraph (b) has been eliminated. It was about optional risk assessment for non-competitive awards. I suppose this means such awards are no longer exempt from risk assessment. Good.

**§ 200.201 Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts.**

New language added to paragraph (b)(1) requires that **project scopes for fixed amount awards must have "measurable goals and objectives"**.

**§ 200.202 Program planning and design.**

Establishes new requirements for agencies to use goal-based program design and performance measurement. This hits agencies, but **probably will impact how recipients engage subrecipients**.

**§ 200.203 Requirement to provide public notice of Federal financial assistance programs.**

This is a new provision, and subsequent provisions in Subpart C are re-numbered accordingly.

Replaces the old CFDA listing with new Federal Assistance Listings (see definitions in Subpart A.)

Adds language requiring agencies to keep their Federal Assistance Listings current and to notify GSA. I guess GSA is managing these listings more intently now.

**§ 200.204 Notices of funding opportunities.**

Previously was \_\_.203.

Now applies only to discretionary awards that are competed. But that's kind of logical anyway.

Adds that NOFOs must include all applicable terms and conditions (including exceptions) of any resulting award. This was already required, somewhere, but now it's here.

**§ 200.205 Federal awarding agency review of merit of proposals**

Previously was \_\_.204.

Adds language clarifying use of delivering results based on program objectives. Requires periodic review of merit review process.

**§ 200.206 Federal awarding agency review of risk posed by applicants.**

Previously was \_\_.205.

Invokes the Improper Payments Elimination and Recovery Act of 2012 by name (previously only by USC citation).

Requires agencies to thoroughly review and consider all information available through FAPIIS on both the applicant and any immediate highest-level owner, predecessor or subsidiary, as may be identified by the applicant (which the applicant is required to do).

Provides for agency to adjust award requirements when a risk evaluation indicates it may be merited.

**§ 200.207 Standard application requirements.**

Previously was \_\_.206. No significant change.

**§ 200.208 Specific conditions.**

Previously was \_\_.207.

Adds clarifying language requiring agencies to align specific award conditions with program design and performance expectations.

Changes terminology from *special conditions* to *additional requirements*.

**§ 200.209 Certifications and representations.**

Previously was \_\_.208.

Invokes the US Constitution. Only God knows why. No other changes.

**§ 200.210 Pre-award costs.**

Previously was \_\_.209. No other changes.

**§ 200.211 Information contained in a Federal award.**

Previously was \_\_.210.

Adds requirement to include performance goals and specify how performance will be assessed in the terms and conditions of the award. This is moved to the top of the section, from its old position at the bottom.

Adds requirement to specify the budget period start/end dates.

Specifies that the total amount of the award must include the approved cost share/match.

Requires language on future budget periods, if such are anticipated, and must indicate that future budget periods are subject to availability of funds and program authority (as well as satisfactory performance and compliance with the terms and conditions).

Requires “clear and unambiguous” specification of the termination provisions of the award.

**§ 200.212 Public access to Federal award information.**

Previously was \_\_.211. Adds a specific FAR citation, but otherwise no change.

**§ 200.213 Reporting a determination that a non-Federal entity is not qualified for a Federal award.**

Previously was \_\_.212. No significant change.

**§ 200.214 Suspension and debarment.**

Previously was \_\_.213. No significant change.

**§ 200.215 Never contract with the enemy.**

New provision requiring compliance with 2 CFR 183 (also new), whenever the award amount will exceed \$50,000, when performed overseas in support of a contingency operation where US armed forces are actively engaged in hostilities.

**§ 200.216 Prohibition on certain telecommunications and video surveillance services or equipment.**

New, and effective 13AUG2020. Implements PL 115-232 section 889(f)(1).

Can't buy telecommunications products made by a long list of Chinese producers, headed by Huawei and ZTE, but including others.

Can't buy services that use prohibited products.

Provides for assistance to wean off of prohibited products/services, at the discretion of the heads of agencies, to ensure that “communications service to users and customers is sustained.”

## **SUBPART D**

### **Standards for Financial and Program Management**

**§ 200.300 Statutory and national policy requirements.**

Adds language to invoke the US Constitution, free speech and religious liberty. Now we know who's writing this stuff. No substantive changes.

**§ 200.301 Performance measurement.**

New language emphasizing the big push for setting goals and measuring progress. This could be simply sensible program management. Let's hope so.

**§ 200.302 Financial management.**

No substantive changes.

**§ 200.303 Internal controls.**

No substantive changes, unless the repeated invocation of the US Constitution has some sinister meaning yet to be revealed.

**§ 200.304 Bonds.**

No substantive changes.

**§ 200.305 Federal payment.**

Previously just *Payment*.

Paragraph (9) adds extensive instructions as to how to return interest earned on Federal advances.

**§ 200.306 Cost sharing or matching.**

No substantive changes.

**§ 200.307 Program income.**

No substantive changes.

**§ 200.308 Revision of budget and program plans.**

No substantive changes. But it's worthwhile to note that (renumbered from 2016) paragraph (e)(3) clarifies that agencies may authorize the carry-forward of unobligated (by the recipient) balances from budget period to budget period.

**§ 200.309 Modifications to Period of Performance.**

Previously just *Period of performance*.

This has been re-written to clarify that extensions and curtailments (early terminations) require an amendment to the Period of Performance.

Also clarifies that a renewal award (as distinguished from an extension) shall have its own, distinct Period of Performance.

**Property Standards**

**§ 200.310 Insurance coverage.**

No substantive changes.

**§ 200.311 Real property.**

No substantive changes.

**§ 200.312 Federally-owned and exempt property.**

No substantive changes.

**§ 200.313 Equipment.**

Paragraph (c)(1) now provides that the awarding agency may require the submission of the applicable common form for equipment, when recipients report on the use of equipment acquired with federal funds.

**§ 200.314 Supplies.**

No substantive changes.

**§ 200.315 Intangible property.**

No substantive changes.

**§ 200.316 Property trust relationship.**

No substantive changes.

**Procurement Standards**

**§ 200.317 Procurements by states.**

No substantive changes.

**§ 200.318 General procurement standards.**

Language added to paragraph (a) clarifies that Federal procurement standards only need to apply to expenditures of Federal (award) funds. Your procurement policy will be fine if it makes distinctions between buying stuff with and without Federal money.

Language added to paragraph (e) is gibberish. Maybe they'll fix it in the final publication in the CFR. (Probably not...) But I think it's meant to mean that competition requirements are met when using strategic sourcing, shared services and other similar procurement arrangements under state and local intergovernmental agreements. Probably only applies to state and local government recipients.

**§ 200.319 Competition.**

Language added to paragraph (a) again clarifies that Federal procurement rules only apply to expenditures of Federal (award) funds. In this case, it specifically applies to competition requirements. In other words, a recipient may stipulate laxer competition requirements in its policy for expenditures of non-Federal funds.

New paragraph (f) underscores that noncompetitive procurements (using Federal funds) must be in accordance with § 200.320(c).

**§ 200.320 Methods of procurement to be followed.**

Extensive changes to this section.

(New) paragraph (a) introduces the notion of informal procurement methods.

Subparagraph (a)(1) goes into great length clarifying micro-purchases. This is useful. Note that (a)(1)(ii) will likely motivate a policy change for recipients. There's a whole bunch of language on setting a recipient's MPT *higher* than the Federal threshold, but this is not likely to impact the majority of recipients (who will have ample rationale for establishing their MPT *considerably lower* than the Federal threshold).

Subparagraph (a)(2) provides new and clarifying language on small purchase procedures (greater than the MPT but not greater than the SAT). Not earthshaking, but useful.



(New) paragraph (b) introduces a nice preamble to the existing language on formal procurement methods. Not substantive, but quite useful and clarifying. No substantive changes.

(New) paragraph (c) adds language to 2016's paragraph (f), clarifying when noncompetitive procedures may be used. Subparagraph (c)(1) adds that noncompetitive procedures may be used whenever the aggregate dollar amount of the acquisition is not greater than the recipient's MPT. This may also prompt a policy amendment for recipients.

**§ 200.321 Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.**

No change.

**§ 200.322 Domestic preferences for procurements.**

Entirely new language vaguely encouraging recipients to "Buy American." The language is somewhat toothless. INGOs should consider working out guidelines with their Federal funders, to assure that their overseas programs are not unduly constrained by this section.

**§ 200.323 Procurement of recovered materials.**

Renumbered from (2016) § 200.326. No substantive changes.

**§ 200.324 Contract cost and price.**

Renumbered from (2016) § 200.323. No substantive changes.

**§ 200.325 Federal awarding agency or pass-through entity review.**

Renumbered from (2016) § 200.324. No substantive changes.

**§ 200.326 Bonding requirements.**

Renumbered from (2016) § 200.325. No substantive changes.

**§ 200.327 Contract provisions.**

Renumbered from (2016) § 200.326. No substantive changes.

**Performance and Financial Monitoring and Reporting**

**§ 200.328 Financial reporting.**

Renumbered from (2016) § 200.327. No substantive changes.

**§ 200.329 Monitoring and reporting program performance.**

Renumbered from (2016) § 200.328.

New paragraph (b) clearly establishes the requirement for performance reports, as follows:

- The Federal awarding agency must use OMB- approved common information collections, as applicable, when providing financial and performance reporting information.
- As appropriate, the Federal awarding agency must require the recipient to relate financial data and accomplishments to performance goals and objectives of the Federal award.

- When required by the terms and conditions of the Federal award, recipients must provide cost information to demonstrate cost effective practices (e.g., through unit cost data). In some instances (e.g., discretionary research awards), this will be limited to the requirement to submit technical performance reports (to be evaluated in accordance with Federal awarding agency policy).
- Reporting requirements must be clearly articulated such that, where appropriate, performance during the execution of the Federal award has a standard against which non-Federal entity performance can be measured

**§ 200.330 Reporting on real property.**

Renumbered from (2016) § 200.329. No substantive changes.

**Subrecipient Monitoring and Management**

**§ 200.331 Subrecipient and contractor determinations.**

Renumbered from (2016) § 200.330. No substantive changes.

**§ 200.332 Requirements for pass-through entities.**

Renumbered from (2016) § 200.331. Significant changes to Paragraphs (a) and (d).

Paragraph (a)(1)(vi) adds the requirement to state the subaward budget period start/end dates.

Paragraph (a)(3)(i) adds significant language clarifying (but not changing) the pass-through entity/subrecipient relationship vis-à-vis the indirect cost rate of the subaward.

Paragraph (d) adds significant clarity in defining the role of the pass-through entity in monitoring the subrecipient. Specifically:

- (d)(2) stipulates that PTE's follow-up on identified deficiencies includes "written confirmation from the subrecipient, highlighting the status of actions planned or taken to address Single Audit findings related to the particular subaward."
- (d)(4) makes the pass-through entity "responsible for resolving audit findings specifically related to the subaward and not responsible for resolving cross-cutting findings." It goes on to clarify what's meant by *cross-cutting findings* and to reassert that, irrespective of any Federal involvement in the subrecipient's audit findings, the PTE remains responsible to "to issue subawards that conform to agency and award-specific requirements, to manage risk through ongoing subaward monitoring, and to monitor the status of the findings that are specifically related to the subaward."

**§ 200.333 Fixed amount subawards.**

Renumbered from (2016) § 200.332. No substantive changes.

## Record Retention and Access

### § 200.334 Retention requirements for records.

Renumbered from (2016) § 200.333. No substantive changes.

### § 200.335 Requests for transfer of records.

Renumbered from (2016) § 200.334. No substantive changes.

### § 200.336 Methods for collection, transmission, and storage of information.

Renumbered from (2016) § 200.335. No substantive changes.

### § 200.337 Access to records.

Renumbered from (2016) § 200.336. No substantive changes.

### § 200.338 Restrictions on public access to records.

Renumbered from (2016) § 200.337. No substantive changes.

## Remedies for Noncompliance

### § 200.339 Remedies for noncompliance.

Renumbered from (2016) § 200.338. No substantive changes. (But yet another invocation of the US Constitution—making me just ever so slightly leery. I mean, it's a great document and all; it's just that I see it honored more in its breach than in compliance, these days. What do they mean?)

### § 200.340 Termination.

Renumbered from (2016) § 200.339.

Language added to paragraph (a)(2) allows termination when the award “no longer effectuates the program goals or agency priorities”

New (a)(5) appears to be an unnecessary reassertion of the prerogative already asserted at (a)(1). But I'm no lawyer.

New paragraph (b) suggests that the awarding agency “no longer effectuates the program goals or agency priorities.” Duh. Maybe they've had some problems with this in the past.

### § 200.341 Notification of termination requirement.

Renumbered from (2016) § 200.3407. No substantive changes.

### § 200.342 Opportunities to object, hearings, and appeals.

Renumbered from (2016) § 200.341. No substantive changes.

### § 200.343 Effects of suspension and termination.

Renumbered from (2016) § 200.342. No substantive changes.

## Closeout

### § 200.344 Closeout.

Renumbered from (2016) § 200.343.

New language provides that the federal agency (or PTE) may proceed with closeout “with the information available,” if the recipient (or subrecipient) “fails to complete the requirements” of the award.

Paragraph (a) adds language stipulating time limits after the end of the performance period when final reporting must be submitted. These are 120 days for recipients and 90 days for subrecipients (to allow for incorporation in recipients’ reporting), and they can be extended when justified. Probably good reason to incorporate this into a recipient’s assistance award policy.

Paragraph (g) has clarifying language added. But there’s no substantive change.

New paragraph (h) amplifies the provision at the beginning of this section regarding closing out with information available, when complete information is unavailable. Must be done within one year of the performance period end date.

New paragraph (i) requires the federal agency to report the recipient’s material failure to FAPIIS (or its successor) when the recipient fails to submit all closeout reporting within one year.

## Post-Closeout Adjustments and Continuing Responsibilities

### § 200.345 Post-closeout adjustments and continuing responsibilities.

Renumbered from (2016) § 200.344.

Adds paragraph (a)(4), clarifying that the Federal agency has the authority to “make financial adjustments to a previously closed award such as resolving indirect cost payments and making final payments” even though the award may have been closed out.

## Collection of Amounts Due

### § 200.346 Collection of amounts due.

Renumbered from (2016) § 200.345. No substantive changes.

## SUBPART E

### General Provisions

#### § 200.400 Policy guide.

No substantive changes.

### **§ 200.401 Application.**

No substantive changes.

## **Basic Considerations**

§§ 200.402-200.411 are unchanged, except for the following:

### **§ 200.403 Factors affecting allowability of costs.**

Add paragraph (h) requiring that costs “must be incurred during the approved budget period. The Federal awarding agency is authorized, at its discretion, to waive prior written approvals to carry forward unobligated balances to subsequent budget periods pursuant to § 200.308(e)(3).”

## **Direct and Indirect (F&A) Costs et al.**

§§ 200.412-200.415 are unchanged, except for the following:

### **§ 200.414 Indirect (F&A) costs.**

Paragraph (h) is added to require that all recipients’ (except tribes) NICRA must be available publicly on an OMB-designated Federal website.

### **§ 200.419 Cost accounting standards and disclosure statement.**

There’s new language in paragraphs (b), (b)(1) and (b)(2) regarding submission of DS-2 for IHEs.

## **General Provisions for Selected Items of Cost**

§§ 200.420-200.476 are not substantively changed, except for the following:

### **§ 200.436 Depreciation.**

Paragraph (c)(3) has added words to clarify the exclusion of depreciation on buildings. It’s about depreciation already claimed as matching. Ask you CFO.

### **§ 200.449 Interest.**

Paragraph (c)(4) adds words to clarify how to determine the “least expensive alternative” in the case of lease versus purchase through another form of debt financing.

### **§ 200.458 Pre-award costs.**

Newly added language updates this section to accommodate the (new in the 2020 edition) concept of *budget periods*, by requiring that **pre-award costs, if approved, be charged to the initial budget period of the award**, unless otherwise specified...

### **§ 200.461 Publication and printing costs.**

Paragraph (b)(3) adds clarifying language. This is about publication costs that are incurred after the end of the performance/budget period but before closeout of the award. (Apparently this isn’t too uncommon for research grants.) When such costs are charged, they should be charged to the final budget period of the award, unless instructed otherwise.

#### **§ 200.464 Relocation costs of employees.**

Paragraph (c) adds clarifying language around the special circumstances when relocation travel costs must be treated as travel costs, not relocation costs. I don't see this discussed in the commentaries that accompany the FR publication of these changes. I wonder what this is about.

#### **§ 200.465 Rental costs of real property and equipment.**

New paragraphs (d), (e) and (f) add three new restrictions on the allowability of rental costs, as follows:

- (d) instructions for dealing with the costs of financed purchases or financed leases. Limitations are imposed.
- (e) how to treat lease payments.
- (f) prohibition on rental of property owned by individuals or entities affiliated with the recipient (self-dealing).

#### **§ 200.471 Telecommunication costs and video surveillance costs**

This is a new section making costs of prohibited equipment (see § 200.216) unallowable. This is part of the implementation of Section 889 of the NDAA.

2016's §§ 200.471-475 are renumbered §§ 200.472-476, to accommodate the insertion of new § 200.471. No substantive changes to these sections.

### **SUBPART E**

Changes in Subpart E are limited to updated citations and references, except for the following:

#### **§ 200.513 Responsibilities.**

Paragraph (a) refines the rules for determining Cognizant Agency for Audit Responsibility. Not huge.

Paragraph (a)(3)(ii) adds provision allowing the government to rely on current and on-going quality control review work.

#### **§ 200.515 Audit reporting.**

Paragraph (a) has added language on auditors' requirements regarding financial statements.

### **Appendix I to Part 200 -- Full Text of Notice of Funding Opportunity**

The only substantive changes to this Appendix are as follows:

#### **A. Program Description— Required**

Language added to require that the Program Description must include "program goals and objectives, a reference to the relevant Assistance Listings, a description of how the award will contribute to the achievement of the program's goals and objectives, and the expected performance goals, indicators, targets, baseline data, data collection, and other outcomes such

Federal awarding agency expects to achieve, and may include examples of successful projects that have been funded previously.”

**B. Federal Award Information—Required**

Language added to require inclusion of “the expected performance indicators, targets, baseline data, and data collection” in this section of the NOFO.

**D. Application and Submission Information**

**4. Submission Dates and Times—Required.**

This section simplified by deleting everything after the first paragraph (stuff about deadline dates, etc. and optional stuff).

**Appendices II through XII.**

No substantive changes were made to these appendices. Numerous non-substantive changes involve correcting references (where sections in the regulation have been renumbered with the 2020 amendment) and changes in the format of references.

Note however, that Appendix II adds paragraphs (K) and (L), which refer (respectively) to 200.216 (prohibition on Chinese telecoms) and 200.322 (domestic preference for procurement).