

Principal Investigator Quick Guide

Major Changes in the Uniform Guidance Affecting Proposal Budgets & Charging of Direct Costs

The Office of Management and Budget (OMB) has combined many federal circulars into a single guidance document (known as Uniform Guidance, or 2 CFR 200) that may be used by all federal agencies. These new regulations will become effective December 26, 2014. Funding agency policy should still be reviewed for their specific requirements.

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| <p>CHARGING ADMINISTRATIVE/CLERICAL AND PROGRAMMATIC SALARY COSTS</p> <p>Applicable Uniform Guidance (UG) Sections: 200.413 200.430</p> | <p>Administrative and clerical salaries (in certain circumstances) AND programmatic salary costs may be included in competitive proposal budgets.</p> <p><u>Administrative and Clerical Salaries</u> In general, administrative and clerical salaries should still not be direct charged, but the rules governing "major project or activity" exceptions have been dropped and replaced by the following criteria, all of which must be met:</p> <ol style="list-style-type: none"> 1. Administrative or clerical services are integral* to a project or activity; 2. Individuals involved can be specifically identified with the project or activity; and 3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency. <p>If all of these requirements are met, PIs/departments should include a justification statement that explains how the services are integral for the project to facilitate the required agency approval.</p> <p>*UConn has determined that integral means the services are essential, vital, or fundamental to the project goals or activity, rather than necessary for the overall operation of the institution.</p> <p><u>Programmatic Salary Costs</u> Costs related to protocol development and maintenance, managing substances/chemicals, managing and securing project-specific data, and coordination of research subjects are allowable direct costs when they are "contributing and directly related to work under an agreement." Thus, these programmatic costs may be direct charged using the same underlying requirements as other types of direct costs, and are not subject to the extra approval requirements required of administrative and clerical costs. They are still subject to all regular costing requirements (e.g., allocability, reasonableness, allowable by terms of the award, incurred within award period).</p> |
| <p>PARTICIPANT SUPPORT COSTS</p> <p>Applicable UG Sections: 200.75 200.456</p> | <p>Participant support costs may be included for agency approval in competitive proposal budgets.</p> <p>After UG implementation, participant support costs are allowable with agency prior approval. This includes stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects. Participant support costs are not routinely allowed on research projects but may be included with sponsor prior approval if the project includes an education or outreach component and the agency approves such costs.</p> <p>These costs should be explicitly listed in the proposal budget or approved by the funding agency after the award has been made.</p> |
| <p>COST SHARING</p> <p>Applicable UG Sections: 200.36</p> | <p>Under Federal research proposals, voluntary committed cost sharing is not expected.</p> <p>It cannot be used as a factor during the merit review of applications or proposals, but may be considered if it is both in accordance with Federal awarding agency regulations and specified in the funding notice.</p> |

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| <p>COMPUTING DEVICES (UNDER \$5,000)</p> <p>Applicable UG Sections: 200.33 200.48 200.89 200.439 200.453C</p> | <p>Computing devices may be included in competitive proposal budgets.</p> <p>Computing devices under \$5,000 may be direct charged to the project or activity under the following circumstances:</p> <ul style="list-style-type: none"> • The machines are essential* and allocable to the project in that they are necessary to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or "peripherals") for printing, transmitting and receiving, or storing electronic information. • The project does not have reasonable access to other devices or equipment that can achieve the same purpose; devices may not be purchased for reasons of convenience or preference. • Items costing more than \$5,000 per unit are considered equipment and follow federal equipment rules for when they can be direct charged. (See 200.33, 200.48, 200.89, 200.439) <p>* PIs are responsible for justifying and determining whether or not the device is "essential" and to what extent the cost of the device is allocable to the sponsored project. PIs and departments should itemize the device in the budget, maintain and provide proper justification documentation that describes how the proposed computing device meets the above requirements, and attach the justification as part of the purchase order requisition. Care should be taken to account for any non-project specific use and costs allocated accordingly.</p> |
| <p>VISA COSTS</p> <p>Applicable UG Section: 200.463D</p> | <p>Short-term, travel visa costs may be included in competitive proposal budgets.</p> <p>Since short-term visas are issued for a specific period and purpose, they can be clearly identified as directly connected to work performed on a Federal award and can be directly charged. They must be critical and necessary (directly benefit) the project and be allowable by the federal agency. Typically, these visas allow employees and students to engage in field research or attend meetings in foreign locations, or allow foreign visitors to visit the University in support of the project.</p> <p>Fees associated with expedited and renewal processing are not allowable direct costs.</p> |
| <p>SUBAWARDS & CLOSEOUTS</p> <p>Applicable UG Section: 200.331</p> <p>Applicable UG Section: 200.343</p> | <p>The subrecipient's negotiated F&A rate or an alternative rate as described below must be used for all subawards included in competitive proposals.</p> <p>If a federal program has a published statutory F&A cap, that rate must be used both by UConn and all of its subrecipients. For all other federal programs, if a subrecipient has a federally negotiated F&A rate, it must be used. If the entity does not have a negotiated F&A rate, a 10% de minimus F&A rate must be used instead. The University may not negotiate or agree to lower rates with subrecipients. There is no change to UConn's recovery of its own F&A - this remains limited to receiving our F&A on the first \$25K of each subaward.</p> <p>The University must submit, <u>no later than 90 calendar days</u> after the end date of the period of performance, <u>all financial, performance and other reports</u> as required by the terms and conditions of the award. Failure to meet this deadline may result in non-payment by the Government.</p> <p>The federal awarding agency may approve extensions, but UConn must liquidate all obligations incurred within this time period unless there is an authorized extension. Subawards must submit final invoices no more than 45 days after the end of the award or they risk not being processed. It is imperative that departments finalize and approve financial obligations, including those related to subawards in a timely manner for closeout. Investigators should consider shortening the length of subawards by 30 days to allow time for final billing from the subawardee when the project goals allow.</p> |