

UC Irvine Uniform Guidance Budgeting and Charging Quick Guide

All expenses charged to federal awards must conform to the cost principles specified in the Office of Management and Budget (OMB) Uniform Guidance or 2 CFR 200. These regulations became effective December 26, 2014. Please contact the Sponsored Projects Administration (SPA) or Contracts and Grants Accounting (C&G Accounting) if you have any questions about whether you may charge a specific expense to federal funds. SPA and C&G Accounting will give you a coordinated response.

<p>CHARGING ADMINISTRATIVE/ CLERICAL COSTS</p> <p>Applicable Uniform Guidance (UG) Section: 200.413(c)</p>	<p>ADMINISTRATIVE AND CLERICAL SALARIES COSTS</p> <p><u>Administrative and Clerical Salaries</u></p> <p>In general, administrative and clerical salaries should be treated as indirect costs, but direct charging of these costs may be appropriate when all of the following criteria are 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; 3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and 4. The costs are not also recovered as indirect costs. <p>If all of these requirements are met, PIs/departments should include a justification statement in the proposal budget justification to facilitate the required agency approval. The justification could be from a programmatic perspective (the scope of work cannot be completed as proposed without the administrative and clerical support) or from a financial, cost control perspective (it is more efficient and financially advantageous to assign certain project tasks to admin/clerical personnel rather than the scientific/research personnel.)</p> <p>To charge administrative and clerical salaries to current federal awards subject to the Uniform Guidance, PIs/departments should submit a prior approval request to SPA and should keep detailed records to support their justification.</p> <p>*Integral administrative or clerical service means the service is essential, vital, or fundamental and contributes directly success of the project and supports a programmatic objective.</p>
<p>CHARGING PROGRAMMATIC SALARY COSTS</p> <p>Applicable Uniform Guidance (UG) Section: 200.430(h)(i)</p>	<p>PROGRAMMATIC SALARY COSTS</p> <p><u>Programmatic Salary Costs</u></p> <p>Costs related to the development and maintenance of protocols, 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.” They are still subject to the same underlying requirements as other types of direct costs, including: allocability, reasonableness, and allowable under award terms. PIs/departments should keep detailed records to support the charging of these costs.</p>
<p>COMPUTING DEVICES (UNDER \$5,000 UNIT COST)</p> <p>Applicable UG Sections: 200.20 200.33 200.453</p>	<p>PURCHASING COMPUTING DEVICES</p> <p>Computing devices are machines used to acquire, store, analyze, process, and publish data and other information electronically and include accessories (or peripherals) for printing, transmitting and receiving, or storing electronic information. Computing devices costing less than \$5,000 are not considered equipment and are treated as supplies and materials. Therefore, if a computing device is to be acquired for use in the performance of a federal award, the computing device may be charged to the federal award provided that:</p> <ul style="list-style-type: none"> · it is essential (i.e., necessary) to performing the work under the award; and · the cost is allocable and reasonable. <p><i>Determining whether a computing device is essential</i> – The PI should consider (and document) whether performing the work under the award without the computing device would be difficult and inefficient. An important measure of this is determining (and documenting) whether the anticipated cost of performing the work without the computing device is greater than the combined cost of performing the work plus the cost of acquiring the computing device.</p> <p><i>Determining whether a computing device is allocable to a federal award</i> – If a computing device is essential to a federal award it is allocable, in whole or in part, to that award. The total cost may be allocated to the benefiting federal award – even when its usage is not solely dedicated to the award. However, PIs and departments should first consider other reasonable methods that may – without undue or extensive effort – result in a more accurate cost allocation.</p> <p><i>Determining whether the cost of a computing device is reasonable</i> – The PI must make an informed, prudent decision taking into consideration not only the cost, but the utility, quality and value of the device to the project.</p> <p>If a computing device is not essential to a federal award, it is not allocable (in whole or in part) as a direct cost to that award. In such cases, the computing device is considered to be a “general use” item and must be treated as an indirect cost expense (just like paper, pens and other general use supplies) and charged to an appropriate institutional funding source.</p>

<p>PARTICIPANT SUPPORT COSTS</p> <p>Applicable UG Sections: 200.75 200.456</p>	<p>CHARGING PARTICIPANT SUPPORT COSTS</p> <p>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 can be charged 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. Prior approval requests to charge participant support costs should be submitted to SPA.</p>
<p>VISA COSTS</p> <p>Applicable UG Section: 200.463(d)</p>	<p>CHARGING SHORT-TERM, NON-IMMIGRATION (TRAVEL) VISA COSTS</p> <p>The UG allows short-term, non-immigration visa costs for a specific period and purpose as direct costs to federal awards. The person connected with these visa costs must be critical, necessary and clearly identified as directly connected to the work performed on the federal award. Because this is being classified as a recruiting cost, only the initial visa cost is allowable. J-1 and H-1B visas are for a specific period and purpose; therefore, costs related to these visa types are generally allowable if they meet all of the following criteria:</p> <ol style="list-style-type: none"> 1. Are critical and necessary to conduct the project; 2. Are allowable under the applicable cost principles; 3. Are consistent with UCI cost accounting policies and practices; and 4. Meet the definition of “direct costs” under the applicable cost principles.
<p>FOOD COSTS</p> <p>Applicable UG Section: 200.432 200.438</p>	<p>CHARGING CONFERENCE / MEETING FOOD (NON-TRAVEL, NON-PARTICIPANT SUPPORT)</p> <p>Allowable conference costs paid by UCI as a sponsor or host of the conference may include costs of meals and refreshments unless further restricted by the terms and conditions of the Federal award.</p> <p>The UG defines conference to mean, “...a meeting, retreat, seminar, symposium, workshop or event whose primary purpose is the dissemination of technical information beyond the non-Federal entity [UCI] and necessary and reasonable for successful performance under the Federal award.”</p> <p>When refreshments, meals or other food costs are part of a conference, such costs may be directly charged to a Federal award provided that the meeting meets the definition of conference.</p>
<p>F&A ON SUBAWARDS</p> <p>Applicable UG Section: 200.331(a)(xiii) 200.414(f)</p>	<p>ALLOWABLE F&A RATE ON SUBAWARDS</p> <p>If a subrecipient has a federally negotiated F&A rate, it must be used by the subrecipient and must be honored by UCI. If the subrecipient does not have a negotiated F&A rate, a 10% MTDC de minimis F&A rate must be used, or the subrecipient may negotiate with SPA for a rate greater than the de minimis rate provided for in the UG. If a federal program has a published statutory F&A rate cap, UCI and all of its subrecipients must use that rate. PIs may not negotiate (or agree to) lower rates with subrecipients.</p> <p>There is no change to UCI’s recovery of its own F&A – this remains limited to receiving F&A on the first \$25K of each subaward.</p>
<p>FIXED PRICE/RATE SUBAWARDS</p> <p>Applicable UG Section: 200.332</p>	<p>FIXED PRICE/RATE SUBAWARDS</p> <p>The total maximum value of each fixed price/rate subaward is capped at \$150,000, and agency prior approval is required to enter into a fixed price/rate subaward. To expedite agency approval, PIs/departments should add a justification statement to proposals contemplating a fixed price/rate subaward with non-UC subrecipients- a statement is not needed for other types of subawards. To establish a fixed/price rate subaward with a non-UC subrecipient under a current federal award and to charge the subaward expenses to that award, PIs/departments should submit a prior approval request to SPA.</p> <p>Fixed price subawards are most commonly used for clinical trial site agreements, foreign subrecipients, and small businesses.</p>