Reference Guide to the Uniform Guidance
What Principal Investigators and Administrators Need to Know

Overview:
The Office of Management and Budget (OMB) has combined eight federal circulars into one document governing grants management policies and guidelines. The new regulations, 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, known as the Uniform Guidance became effective December 26, 2014.

This reference guide provides a brief summary of some of the key items that principal investigators and administrators should be aware of. For more detailed information review the Uniform Guidance website or contact us at osp@boisestate.edu.

Allowable Costs:
To be reimbursable, costs must be “allowable, allocable and reasonable.” (200.403; 200.404; 200.405)
A cost must meet the following criteria in order to be “allowable” under a federal award:

• Be necessary and reasonable for the performance of the award and be allocable (benefits the project that it is being charged to); and
• Conform to any limitations or exclusions set forth in regulations or a specific agreement; and
• Be consistent with policies and procedures that apply uniformly to both federally-financed and other Boise State University activities;
• Be accorded consistent treatment.

A cost is “reasonable” if it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. A cost is “allocable” to a particular award if it is incurred, specifically for the award, or is partially assignable to an award in accordance with cost allocation principles.

Select Cost Items:

Administrative and Clerical Salaries (200.413) – Boise State University normally treats these costs as indirect costs. Direct charging of these costs may be allowable only if all of the following conditions are met:

• Administrative or clerical services are integral1 to a project or activity;
• Individuals involved can be specifically identified with the project or activity;
• Such costs are explicitly included in the budget or have the prior written approval of the federal awarding agency; and
• The costs are not also recovered as indirect costs.
Integral is defined as essential to the project’s goals and objectives, rather than necessary for the overall operation of Boise State University.

All requests for administrative and clerical salaries must be included in the proposal budget with an explanation of how the services are integral to the project. If administrative or clerical expenses are identified after an award is received, prior approval must be obtained from the sponsor. Such requests must be signed by a representative of the OSP.

You may not include the salaries of administrative personnel conducting such activities as financial reconciliations, general office clerical work, and proposal preparation.

Examples of projects where administrative and clerical costs could be included as direct costs in a proposal, with proper justification, include, but are not limited to:

- Large, complex programs, such as program projects, research centers, and other similar sponsored projects that require significant administrative management;
- Projects that involve extensive data accumulation, data analysis, surveying, and tabulation;
- Projects with complex project management requirements, e.g., managing multiple subawards; and
- Projects that require making travel and meeting arrangements for large numbers of participants, such as conferences.

Costs for developing and maintaining human or animal research protocols, managing substances and chemicals, securing project-specific data, or coordinating research subjects, are not considered “administrative and clerical.” Therefore these costs may be directly charged to a project without obtaining prior approval, provided that they are directly related to work under a federal award and meet all the standard costing requirements. (Appendix III. 6.b. to Part 200)

**Computing Devices** (200.20; 200.58; 200.94) - Computing devices are defined as machines used 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.

Computing devices should be included under the budget category ‘Other Expenses’ in proposals. Computing devices costing less than $5,000, which are essential and allocable, but not solely dedicated to the performance of a federal award, may be charged 100% to an award, or may be allocated to several awards. While no prior agency approval is required, computing devices should be itemized in the proposal budget. In addition, the project must not have reasonable access to other devices that can achieve the same purpose. Devices may not be purchased for reasons of convenience or preference.
Conferences (200.432)- The Uniform Guidance defines a “Conference” as meeting, retreat, seminar, symposium, workshop or event whose primary purpose is the dissemination of technical information beyond the University and is necessary and reasonable for successful performance under the sponsored award. Allowable conference costs when the University acts as a conference sponsor or host, include:

- Rental of facilities,
- Speakers’ fees,
- Costs of meals and refreshments served at the conference,
- Local transportation,
- Other items incidental to the conferences, unless restricted by the award terms and conditions, and
- As needed, the costs of identifying (but not providing) locally available dependent-care resources.

Networking and social activities pre- or post-conference are considered entertainment costs and are unallowable on sponsored projects unless the sponsor has provided written approval for this type of event.

Entertainment costs – (200.438) are allowable only when the cost has a programmatic purpose to the award, and is authorized either in the approved budget or with the prior written approval of the federal awarding agency. In all other cases, costs of entertainment, including amusement, and social activities, and any associated costs are unallowable.

Goods or Services for Personal Use (200.445) - Costs of goods or services for personal use are unallowable regardless of whether the cost is reported as taxable to the employee.

Memberships and Subscriptions (200.454) - The costs of the University’s membership in business, technical, and professional organizations, and subscriptions to business, technical, and professional periodicals are allowable when they provide a direct benefit to the project. The cost of memberships in any civic or community organization is allowable with the prior approval of the federal awarding agency or pass-through entity. These costs must be itemized in the budget and described in the budget justification, or receive prior-written approval before the incurrence of such costs.

Membership fees or dues, such as airline, social, dining and country club dues cannot be charged directly to federal or non-federal sponsored projects.

Participant Support Costs (200.75; 200.456; 200.68) – Participant Support costs are allowable with agency prior approval. These costs should be explicitly listed in the proposal budget or approved by the funding agency after the award has been made. Participant Support costs include 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. Participant support costs do not include costs payments to individuals involved in human subject testing.

Under the Uniform Guidance, participant support costs should be excluded from the MTDC calculation.

**Travel, dependent care costs (200.474)** - Travel costs include expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official University business. They are allowable on sponsored awards when participation is necessary for the project, and the costs are reasonable and consistent with the University’s documented travel policies. The University’s travel policy does not allow for the reimbursement of dependent care costs while traveling. Therefore, these costs remain unallowable on the University’s sponsored awards since the Uniform Guidance requires consistent treatment across all fund types.

**Visas, Short-term (200.463)** - Visas (as opposed to longer-term immigration visas) are issued for a specific period and purpose, and therefore can be clearly identified as directly connected to recruitment of personnel for a federal award. For the costs to be directly charged to a federal award, they must be critical and necessary for the conduct of the project.

**Unallowable Activities:**

- Alumni activities
- Organized fundraising
- Lobbying
- Commencement and Convocation
- General public relations and alumni activities
- Student activities such as intramural activities and student clubs
- Managing investments solely to enhance income
- Prosecuting claims against the federal government
- Defending or prosecuting certain criminal, civil, or administrative proceedings
- Housing and personal living expenses of Institute officers
- Selling or marketing of goods and services (does not include selling goods or services internal to the Institute by its service centers)

**Unallowable Practices:** The following practices are not allowable.

- Purchasing items simply to exhaust funds.
- Rotating funds among projects to exhaust funds is not allowable.
- Charging an expense exclusively to a single award when the expense supported other activities.

If you have questions about how to handle a specific cost issue, please contact your Research Administrator or Sponsored Project Administrator.
Subrecipient Monitoring: (200.331; 200.305; 200.339)

It is the PI’s responsibility to monitor the performance of any subrecipient receiving funding from the PI’s federal award. Monitoring may include reviewing the subrecipient’s financial and programmatic reports and, when appropriate, evaluating the subrecipient’s completed milestones and deliverables. PIs should thoughtfully review the subrecipient’s performance in these areas before signing any invoice authorizing payment of funds to a subrecipient. The Uniform Guidance requires the University to pay subrecipient invoices, for cost reimbursable subawards, within 30 days of receipt of invoice unless the PI believes the request to be improper. PIs should notify their Sponsored Project Administrator as soon as possible if a subrecipient’s performance or invoice for payment does not conform to the terms and conditions of the subaward. It is the responsibility of the University PI to monitor the activities of subrecipients to ensure that federal funds issued to the subrecipient are used for authorized purposes in compliance with laws, regulations, and the provisions of subagreement and that the performance goals are achieved. The PI should alert the Office of Sponsored Programs of any subrecipient performance or compliance issues as soon as possible.

Cost Sharing: (200.306)

Cost sharing is the portion of the total project costs of a sponsored agreement borne by the University or third party, rather than by the sponsor. Two important types of cost sharing are: mandatory cost sharing required by the sponsor as a condition of the award and explicitly enumerated in the proposal and voluntary committed cost sharing not required by the sponsor but offered in the proposal by the applicant. The Uniform Guidance reinforces the fact that voluntary committed cost sharing is neither expected nor considered during merit review of the proposal. Federal agencies must require mandatory cost share or not consider it at all.

PI Disengagement: (200.308)

The Uniform Guidance recognizes that PIs can be away from campus and remain engaged in the project. Prior approval from federal awarding agencies must be obtained for the following program or budget-related reasons:

- Change in scope or objective of the project or change in a key person identified in the grant application;
- Disengagement from the project for more than 3 months, or a 25% reduction in committed time.