

## The Uniform Guidance: Some Changes of Note to PIs

<p><b>Administrative/Clerical Salary Costs</b></p> <ul style="list-style-type: none"><li>• Previously, it was necessary to invoke the “major project” designation to treat administrative and clerical salaries as direct costs. This requirement has been dropped and replaced with the standards described below.</li><li>• Administrative and clerical salaries are still normally treated as indirect (F&amp;A) costs, but the Uniform Guidance permits direct charging to a federal grant award under the following conditions:<ul style="list-style-type: none"><li>✓ The administrative or clerical services are integral to the project.</li><li>✓ The individuals involved can be specifically identified with the project.</li><li>✓ Such costs are explicitly included in the budget or have the prior written approval of the award agency.</li><li>✓ The costs are not also recovered as indirect costs.</li></ul></li></ul>	<p><b>Collection and Storage of Information</b></p> <ul style="list-style-type: none"><li>• The Uniform Guidance encourages a shift from paper to electronic methods of storage.</li><li>• Federal agencies and award recipients are encouraged to collect, transmit, and store federal award-related information in electronic rather than paper format “whenever practicable.”</li><li>• When original records are electronic and cannot be altered, there is no need to create and retain paper copies.</li><li>• When original records are paper, they may be converted to an electronic format provided they are subject to quality control reviews, provide reasonable safeguards against alteration, and remain readable.</li></ul>
<p><b>Closeout</b></p> <ul style="list-style-type: none"><li>• The Uniform Guidance seeks to standardize closeout procedures by establishing an across-the-board, 90-day period for the closeout of federal grant awards.</li><li>• All reports, including technical, financial, and patent reports are due by the end of that period, and cash drawdowns may be restricted after the 90-day window has closed.</li><li>• There may be agency-specific exceptions to this. For example, NIH has established a 120-day closeout period.</li></ul>	<p><b>Computing Devices</b></p> <ul style="list-style-type: none"><li>• Previously, there was uncertainty regarding whether computing devices needed to be tracked as equipment and the circumstances under which they could be charged to federal grant awards.</li><li>• The Uniform Guidance clearly defines computing devices under \$5,000, including computing peripherals, as “supplies” that may be charged directly to federal awards if they are:<ul style="list-style-type: none"><li>✓ Essential and allocable to the performance of the award.</li><li>✓ The project does not have reasonable access to other devices or equipment that can achieve the same purpose.</li></ul></li><li>• They do not need to be solely dedicated for use on the award, but devices intended for general purpose use may not be directly charged.</li></ul>

<p style="text-align: center;"><b>Cost Sharing</b></p> <ul style="list-style-type: none"> <li>• The Uniform Guidance places new limits on cost sharing requirements established by federal agencies.</li> <li>• It clarifies that voluntary cost sharing is not expected in federal research proposals and that it cannot be used as a consideration during proposal merit review.</li> <li>• In order for cost sharing to be treated as an eligibility requirement for funding by a federal agency, the criteria to be applied must be specified in the notice of funding opportunity.</li> </ul>	<p style="text-align: center;"><b>Indirect (F&amp;A) Costs</b></p> <ul style="list-style-type: none"> <li>• The Uniform Guidance also addresses the payment of indirect costs to entities receiving federal grant awards and subawards.</li> <li>• Federal agencies issuing grant awards and entities issuing federal subawards must include indirect costs that reflect the recipient organization’s federal indirect cost rate agreement.</li> <li>• Recipient organizations without such an agreement are entitled to a 10% indirect cost rate.</li> <li>• These requirements apply to DePaul as both a recipient of federal grant awards and as an entity that issues federal subawards.</li> </ul>
<p style="text-align: center;"><b>Participant Support Costs</b></p> <ul style="list-style-type: none"> <li>• Participant support costs were previously defined at the agency level by agencies such as NSF and NIH.</li> <li>• Such costs are now defined across the board by the Uniform Guidance as “direct costs for items such as stipends or subsistence allowance, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conference or training projects.”</li> <li>• Costs that meet this definition are allowable only with the prior written approval of the federal awarding agency. Such approval is necessary to move funds into or out of the participant support budget category.</li> <li>• Participant support costs must be excluded when calculating the Modified Total Direct Costs (MTDC) to determine the overall project’s F&amp;A costs.</li> </ul>	<p style="text-align: center;"><b>Procurement</b></p> <ul style="list-style-type: none"> <li>• The Uniform Guidance strongly emphasizes the need for competition coupled with supporting documentation for all goods and services costing \$3,000 or more. (This differs from DePaul’s threshold of \$25,000.) <ul style="list-style-type: none"> <li>✓ For purchases between \$3,000 and \$150,000, rate quotes must be obtained from an adequate number of qualified sources. (Using DePaul’s designated vendors fulfills this requirement.)</li> <li>✓ For purchases greater than \$150,000, bids or proposals are needed.</li> </ul> </li> <li>• The sole source designation is still an option for situations where the item or service is available only from a single source.</li> <li>• Because of the challenges involved, the Office of Management and Budget (OMB) has granted a grace period—until July 1, 2017—for implementation of the procurement requirements.</li> </ul>

<p style="text-align: center;"><b>Publication Costs</b></p> <ul style="list-style-type: none"> <li>• Previously, all project costs had to be incurred before the project end date.</li> <li>• To facilitate dissemination of research results, the UG allows publication costs incurred after the project end date to be charged to federal grants awards as long as this is done during the closeout period.</li> <li>• Publication costs may include both electronic and print media.</li> <li>• Page charges for professional journal publications are allowable where: <ul style="list-style-type: none"> <li>✓ The publications report on work supported by the federal grant award.</li> <li>✓ Charges are levied equally on all items published by the journal.</li> </ul> </li> </ul>	<p style="text-align: center;"><b>Travel Costs</b></p> <ul style="list-style-type: none"> <li>• The Uniform Guidance places increased emphasis on documenting that travel costs benefit the projects to which they are charged.</li> <li>• If travel costs are charged to a federal award, the documentation for such charges must justify that travel by the individual was necessary to the federal award.</li> <li>• Proposals that anticipate travel on a federal award should include a budget justification clarifying who is traveling and why that person’s travel is necessary.</li> <li>• Travelers should retain documentation as to why the trip was necessary and how it benefitted the project.</li> </ul>
<p style="text-align: center;"><b>Subawards</b></p> <ul style="list-style-type: none"> <li>• The Uniform Guidance establishes requirements involving federally-sponsored subawards that are more extensive and detailed than previous ones. For example: <ul style="list-style-type: none"> <li>✓ A risk assessment of the subrecipient, based on a number of factors specified in the Guidance, must be conducted before a federal subaward is issued.</li> <li>✓ Identified risks are to be taken into account when preparing the subaward and developing a required subaward monitoring plan.</li> <li>✓ Information and requirements that must be included in federal subawards are specified in the Guidance.</li> <li>✓ The entity issuing the subaward is obligated to verify that the subrecipient fulfills its federal audit requirements during the time that the subaward is in effect.</li> </ul> </li> </ul>	<p style="text-align: center;"><b>Visa Costs</b></p> <ul style="list-style-type: none"> <li>• Short-term, travel visa costs are now deemed allowable expenses.</li> <li>• Because 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.</li> <li>• Such visas can enable faculty and students to engage in field research or attend meetings in foreign locations. They can also allow foreign visitors to visit the University in support of a project</li> <li>• For such costs to be directly charged to a federal award, they must be critical and necessary for the conduct of the project.</li> <li>• Long-term visa costs, such as those that enable employment (for example “J” and “H1B” visas) are not allowable as direct charges.</li> </ul>