John Carroll UNIVERSITY

Header

Policy Name and Number: **Determining Allowability of Costs on Sponsored Programs Policy** (S4.2)

Policy Developer(s): Office of Sponsored Programs

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Contact Person for Website: Director of Sponsored Programs

Body

POLICY

Each financial transaction charged against a sponsored programs award at John Carroll University ("the University") must meet the criteria of allowability, allocability, and reasonableness.

SCOPE

This policy applies to all University faculty and staff involved in the fiscal operations and administration of grants and contracts or otherwise with the authority to identify expenses under grants and contracts.

PROCEDURES

1. **Basic Concepts**: The concepts of allowability, allocability, and reasonableness of costs directly address the legitimacy of a cost charged against a specific sponsored programs award. Determination of allowability, allocability, and reasonableness of a given expense is based on specific guidelines of the sponsor and federal cost principles.

   Allowability, allocability and reasonableness are defined and determined by the Office of Management and Budget (OMB), the sponsor's requirements, and/or University policy. 45 CFR 75 Uniform Administrative Requirements, Cost Principles and Audit Requirements for HHS Awards and 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards define these terms.

   a. **Allowability**: Expenses charged to a sponsored programs award must meet the following allowability criteria:

      i. The costs must be treated consistently through application of applicable generally accepted accounting principles appropriate to the circumstances, and

ii. The costs must conform to any limitations or exclusions set forth in the sponsored agreement or in Federal Cost Principles (45 CFR 75, Subpart E and 2 CFR 200, Subpart E).

b. **Allocability**: Once allowability criteria have been met, the cost must be evaluated against the criterion of allocability. That is, has the cost been incurred solely to support or advance the work of a specific sponsored programs award? It also means the process of assigning a cost, or a group of costs, to one or more cost objectives, in realistic proportion to the benefit provided or other equitable relationship. A cost objective may be a major function of the institution, a particular service or project, a sponsored agreement, or overhead (F&A) activity.

c. **Reasonableness**: The cost must be able to withstand public scrutiny: i.e., objective individuals not affiliated with the institution would agree that a cost is appropriate on a sponsored programs award or as a component in its indirect cost rate.

Once a determination of allowability, allocability and reasonableness has been made, it is important that all grant expenses be charged to the assigned organization and fund code in the University's accounting and financial system. Budget and expenditure information recorded in the accounting system serves as the basis for (a) project/account specific planning and reporting; (b) both external and internal audits; (c) the preparation of annual financial statements for the University; and (d) departmental-level planning and reporting; and many other uses. See Appendix A for a quick reference guide.

2. **Unallowable Costs**

a. **Unallowable Costs on All Federal Awards**: Federal regulations identify specific costs and categories of costs that cannot be charged, directly or indirectly, to federally sponsored agreements. These costs are never allowed on federally sponsored awards nor can they be charged to funds that will be treated as a part of indirect cost pools. Unallowable costs are generally defined by the federal government in 45 CFR 75, Subpart E and 2 CFR 200, Subpart E, General Provisions for Selected Items of Cost. 45 CFR 75.420-475 and 2 CFR 200.420-200.475 address certain cost categories and defines whether they are allowable as charges on grants. See Appendix B for a detailed list.

b. **Unallowable Costs on Federal Awards Issued Prior to Uniform Guidance**: In addition to the costs in Appendix B, the following costs are also unallowable for awards governed by 2 CFR 220 (formerly known as OMB Circular A-21): computers not solely designated for research purposes and contingency provisions.

c. **Unallowable Directly Associated Costs**: In addition to unallowable costs per se, charges to federally sponsored agreements must also exclude costs that are directly associated with the unallowable costs. A directly associated cost is defined in federal regulations as any cost which is generated solely as a result of the incidence of another cost, and which would not have been incurred had the other cost not been incurred. An example of a cost that is directly associated with an unallowable cost is the cost of airfare to go to another city for the purpose of entertaining business associates, or for fundraising. Since entertainment and fundraising costs are expressly unallowable under 45 CFR 75, Subpart E and 2 CFR 200, Subpart E, and the airfare would not have been incurred had the unallowable costs not been incurred, the airfare is an unallowable directly associated cost.

d. **Other Unallowable Costs**: While this policy addresses specific unallowable costs, the following practices would generally result in charges being disallowed:
   i. Rotating charges among sponsored projects by month without establishing that the rotation schedule reflects the relative benefit to each grant.
   ii. Assigning charges to the sponsored project with the largest remaining balance.
   iii. Charging an amount based on the approved project budget versus the actual costs.
   iv. Assigning charges to sponsored projects before the cost is incurred.
   v. Charging expenses exclusively to sponsored projects when the expense also has supported non-sponsored project activities.
   vi. Assigning charges that are part of the normal administrative support for contracts and grants which are included in indirect costs (e.g., proposal preparation, accounting, payroll).
   vii. Charging costs to substantially complete sponsored projects to expend remaining funds, without regard to the appropriateness of the costs.

3. **Supporting Documentation**: Costs assigned to sponsored projects must be adequately documented by accounting records and supporting documentation. Examples of appropriate documentation per budget categories are listed below:
   a. Salaries and Wages: employee pay stub; payroll allocation report; payroll summary; timesheets
   b. Travel: mileage and reimbursement detail log; receipts for actual expenses; invoices for training; completed conference registration
   c. Supplies: itemized invoice; receipt that includes vendor name, description of item or service purchased, total amount paid, and date
   d. Vendor/Contractor Services: fully executed contract; itemized invoice, to include rate of reimbursement and quantity provided, signed by the contractor
4. **Sanctions**: Failure to adhere to this policy and procedures may result in the administrative suspension and/or termination of a sponsored program agreement and other appropriate actions for faculty and staff involved in the sponsored project.

CROSS REFERENCES

1. University Policies, including but not limited to

a. Sponsored Programs Policies
b. Bank Account Reconciliation

2. Federal Regulations, Statement, and Mandates

a. 45 CFR 75.403
b. 45 CFR 75.404
c. 45 CFR 75.405
d. 2 CFR 200.403
e. 2 CFR 200.404
f. 2 CFR 200.405
g. HHS Grants Policy Statement
h. HRSA Legislative Mandates in Grants Management for FY 2024
i. NIH Grants Policy Statement
j. NSF Proposal and Award Policies and Procedures Guide

This policy will next be reviewed five years from the approval date/date of last review.

Appendices

APPENDIX A.Quick Reference Guide:

1. For a charge to be *allowable*, consideration should be given to these items in the following order of precedence (highest to lowest):

a. terms and conditions of the award;
b. terms and conditions of the program;
c. terms and conditions of the agency; and
d. federal cost principles (45 CFR 75, Subpart E and 2 CFR 200, Subpart E).

In addition to the guidance offered in the documents listed above, public law and University policy also provide a framework for allowability decisions. On occasion, costs may be allowable to a sponsor, but not allowable under University policy. Therefore, it is imperative to consult with your research administrator or the Office of Sponsored Programs on any allowability concerns.

2. For a charge to be *allocable*, consideration should be given to these items:

a. consistency;
b. sound allocation methodology; and
c. appropriate documentation

3. For a charge to be *reasonable*, consideration should be given to these items:

a. necessity of expenditure;
b. advancement of scope;
c. consistency with established institutional policies and practices; and
d. evaluation by prudent individuals during audits.

APPENDIX B Unallowable Costs on All Federal Awards

1. Advertising and public relations (expenditures to promote the University are not allowable, but advertising costs for recruitment of personnel, program outreach and other specific purposes (i.e. human subjects) necessary to meet the requirements of the Federal award are allowable)
2. Alcoholic beverages
3. Alumni/ae activities
4. Bad debts
5. Commencement or convocation costs
6. Charitable contributions, donations, remembrances (however, the value of donated services may be used to meet cost sharing or matching obligations)
7. Commercial air travel costs in excess of the basic least expensive unrestricted accommodations class offered by commercial airlines
8. Development/fundraising costs
9. Entertainment costs (costs of entertainment, including amusement diversion, and social activities and any costs directly associated with such costs, such as tickets to shows or sporting events, meals, lodging, rentals, transportation, and gratuities)
10. Fines, penalties, damages and other settlements
11. Goods or services for personal use of employees (including gifts)
12. Housing and personal living expenses of University officers
13. Investment management costs
14. Lobbying
15. Losses on other sponsored agreements or contracts (cost overruns; any excess of costs over income under any other sponsored agreement or contract of any nature is unallowable. This includes, but is not limited to, the institution's contributed portion by reason of cost-sharing agreements or any under-recoveries through negotiation of flat amounts for indirect costs.)
16. Pre-award costs (unless approved by the sponsoring agency or permitted under expanded authorities)
17. Selling and marketing costs of any products or services of the institution
18. Student activity costs incurred for intramural activities, student publications, student clubs, etc.
19. Interest expense (however, interest paid to external parties that is associated with the acquisition of equipment or other capital assets is generally allowable)