



Additional information and recommended wording

CHARGING ADMINISTRATIVE AND CLERICAL (200.413) AND PROGRAMMATIC SALARY COSTS (200.430)

AT TIME OF PROPOSAL

- If it is determined that the administrative and clerical services are essential, vital, or fundamental to the project or activity, PIs/departments must explicitly highlight and explain in proposal budget justifications administrative and clerical costs that meet the direct charging definitions, explain why these costs are integral (SEE below for examples) to the project, and include a statement similar to the following example:
 - *“This award includes management of 15 subawards. This volume and the tight timeline of the project mandate more extensive administration and monitoring than the services routinely provided by the department. XX% of a program assistant is needed to oversee the subrecipients’ activities, including working with central offices to perform risk assessment and subrecipient monitoring, ensuring timely delivery and review of invoices, acquiring progress reports and ensuring their review, resolving mid-project issues, monitoring compliance approvals, ensuring timely payments, and handling subaward modifications*

Examples of projects that could meet the definition of “integral”:

- Large, complex programs, such as General Clinical Research Centers, program projects, research centers, and other grants and contracts that entail assembling and managing teams of investigators from a number of institutions.
- Projects which involve extensive data accumulation, analysis and entry, surveying, tabulation, cataloging, searching literature, and reporting (such as epidemiological studies, clinical trials, and retrospective studies of clinical records).
- Projects that require making travel and meeting arrangements for large numbers of participants, such as conferences and seminars.
- Projects where the principal focus is the preparation and production of manuals and large reports, books, or monographs (excluding routine progress and technical reports).
- Projects that are geographically inaccessible to normal departmental administrative services, such as research vessels, and other field research remote from campus.
- Projects requiring significant amounts of project-specific database management; individualized graphics or manuscript preparation; human or animal protocols, and multiple project-related investigator coordination and communications.

AT TIME OF AWARD

- If a proposal is submitted with the required statement/justification (as shown on the prior page), and an award is subsequently issued by the federal agency without explicitly deleting the administrative cost, the NOGA will reflect approval to charge the requested cost. Note that any significant increases to approved administrative costs should be justified and documented, and may be questioned upon audit.
- An administrative or clerical employee's time may be fully or partially charged to sponsored projects with the balance charged to non-sponsored fund sources.
 - For example, an employee's effort might be direct charged 25% time to one PI's project, 20% to another PI's project, and 55% to non-sponsored activities.
 - If any portion of the employee's time is direct-charged to a sponsored project, the employee must certify his or her effort on the Personnel Action Form.

AGENCY APPROVALS NEEDED DURING THE AWARD

- If new or additional administrative or clerical support is needed during the life of the award, PIs must request ORPA to contact the federal grants officer (as dictated by the federal agency) to request approval to direct charge the new/additional administrative services. These letters must be signed by the PI, be prospective (not retroactive) and include the following:
 - The percentage of effort, time period needed, and estimated cost to the project (salary, fringe benefits, and associated indirect cost)
 - An explanation from what budget category the funds will be rebudgeted
 - How the services are integral to the projectPIs should allow a minimum of 30 days for an agency response.

F&A ON SUBAWARDS (200.331)

- When UR is the subrecipient, the pass-through entity (the organization that receives a federal award directly) is obligated to honor UR's negotiated F&A rate and may not impose additional restrictions or limitations on F&A unless the program has a statutory or other rate reduction approved by the head of the federal agency.
- PIs may **not** negotiate rates with their subrecipients. Questions about appropriate F&A should be referred to ORPA.
- If a federal program has a statutory F&A rate (e.g., certain USDA programs) or a posted F&A rate exception, the University will use the federally approved rate for its work and will allow its subrecipients to use that same rate. All remaining proposals must use the subrecipient's federally negotiated rate or (in the absence of a federally negotiated rate) the 10% MTDC de minimus rate unless subrecipient requests a lower rate.

FIXED PRICE/RATE SUBAWARDS (200.332)

AT TIME OF PROPOSAL

- The following statement should be added to competitive proposals containing subawards that are anticipated to be issued as fixed price and the cumulative estimated cost of the fixed price subaward is expected to be less than \$150K:

"The subaward to [Name the subrecipient here] documented in this proposal meets the criteria described in Subpart C- 200.201(b) and the University of Rochester is therefore requesting prior agency approval of this Fixed Price Subaward. The University will consider this subaward approved if an award is made and no contrary guidance from the agency is included in the award notice."

- General research collaborations are not likely to be issued as fixed price. If you are uncertain about how to set up the subaward, consult your ORPA RA for guidance, or omit the statement – you will be able to do an after-award-issuance request if it is determined that a fixed price subaward is needed.
- ORPA reserves the right to make the final determination at time of subaward issuance whether to issue the subaward on a fixed price basis or cost-reimbursement basis. This is true regardless of whether a fixed price justification statement was included in the proposal.