SPON-005 Cost Sharing Requirements (Cash or In-Kind Matching) for Sponsored Research Projects



Policy Owner	Approval Date	Effective Date
President	November 14, 2018	November 14, 2018

Search Terms	Scheduled for Review
cost sharing, cash match, in-kind match, pres, c	Spring 2023

I. Policy Statement

Cost sharing and cash or in-kind matching are terms used to refer to the share of sponsored project costs which are borne by sources *other than* the sponsor's funds awarded to the project.

Cost sharing, whether cash or in-kind, should be included *only where absolutely required* by the sponsor. All matching and cost sharing resources must meet the following general criteria:

- They must be verifiable from the recipient's accounting records;
- They must be necessary and reasonable for the proper and efficient accomplishment of the proposed project objectives, as documented in the proposal. For example, cost sharing or cash matching must be a direct service, such as percentage of faculty/staff time, donated computer lab/network/website costs or time, or a contributed cash outlay from the College;
- In the case of Federal funding only, they must be allowable under applicable federal cost principles (OMB Uniform Guidance 2 CFR 200). This requirement is true even if the asset is derived from a third party contribution;
- They may not be paid by the federal government under another award in the current or prior project period; and
- They must be provided for in the approved project budget and documented in the Cayuse approval form for the proposal by amount, account (if cash), and calculation for in-kind.

If cost sharing is other than the PI's effort explicitly stated in the proposal or other in kind contributions, the responsible College official(s) must guarantee the cost sharing commitment in writing. Once an award is made, all cost sharing commitments are considered mandatory and represent binding obligations for the College.

Waiver or reduction of indirect costs (facilities and administration costs) even where acceptable by the sponsor <u>is not an allowable or an appropriate form of cost sharing and is prohibited by the college</u>. The U.S. Department of Education strictly prohibits the use of waived indirect costs as cost sharing.

As requirements for cost sharing vary widely, Principle Investigators should consult with the Office of Sponsored Research and Federal Relations for individual granting agency/sponsor requirements.

II. Reason for Policy

To establish when and how cost sharing is allowed on sponsored research projects and to expressly prohibit a waiver or reduction of indirect costs (R & A or facilities and administration costs) as a form of cost sharing.

III. Responsibilities

For following the policy: Principal Investigators, Project Directors and other faculty or staff members who are responsible for the operation of Sponsored Research projects

For enforcement of the policy: Office of Sponsored Research, Department Chairs, Deans, Vice Presidents, Provost

For oversight of the policy: President

For notification of policy: Policy Librarian

For procedures implementing the policy: Director of Sponsored Research, Senior Accountant in the Controller's Office

IV. Definitions

Cost Sharing: Any project costs that are not borne by the sponsor. These can include direct cash contributions to the project and/or in-kind (non-cash) contributions to the project not paid for using grant funds.

Principal Investigator (PI): The primary individual responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, training or public service project, contract, or other Sponsored Project in compliance with applicable laws and regulations and institutional policy governing the conduct of sponsored research.

Indirect Costs: Also known as overhead, F & A, facilities and administration costs): *Indirect costs* are a percentage of the total proposed direct costs of a grant budget or a percentage of salaries and benefits of a grant budget used to reimburse the institution for costs it incurs in running and housing the grant program. Indirect costs are those not directly associated with the grant proposal, such as the cost of facilities and utilities (heat, electricity, office space), audit, legal, accounting, and other institutional costs that are needed to successfully conduct the grant program. Indirect costs are incurred for common or joint objectives, and cannot be easily and specifically identified with a particular sponsored project, an instructional activity, or any institutional activity.

Cash Matching: Direct cash contributions made to the project in addition to sponsor funds.

In-kind Matching: Non-cash contributions to the project (such as a percentage of faculty/staff time or donated computer lab/network/website costs/office space) not paid for from project funds.

Sponsor/Granting Agency: The source of the external funds to support a sponsored project (grant or contract). The sponsor/granting agency can be a federal, state or local government entity, corporation, foundation or trust.

Sponsored Projects/Sponsored Awards/Sponsored Research: Those projects and/or activities which are originated and conducted by members of the FLC faculty or staff, and which are supported wholly or in part by restricted funds awarded to the College by an external sponsor/granting agency.

V. Procedures

Amounts Protocol Documentation Type I: Cost Sharing - In Kind:

In Kind

PI's are encouraged to work with the **Office of Sponsored Research and Federal Relations to identify in kind cost sharing resources** or to leverage other non-federal soft money resources, whenever possible.

Project Budget, Budget Justification, Cayuse Summary Page **Type II: Cost Sharing - Cash Match**

< and/or = \$5,000 Must be negotiated **by the PI and the Dean with the Provost** Project Budget, Budget Justification, Cayuse Summary Page >\$5,000 - \$15,000 Must be negotiated **between the PI, Dean/Vice President with the Provost.** Cash matches of this amount **must be an institutional priority** and allocated over the succeeding fiscal year. Documentation must include the amount of cash match, source, and approximate date when needed, as detailed on the Cayuse Summary Page, Project Budget and Budget Justification. > \$15,000

Must be negotiated between the PI and Dean with the Vice President's Counsel and the **Budget Advisory Committee.** Cash matches of this amount **must be an institutional priority** and allocated over the succeeding fiscal year.

Documentation must include the amount of cash match, source, and approximate date when needed, as detailed in the Cayuse Summary Page, the Project Budget, and the Budget Justification.

VI. Cross Referenced Policies

Federal Policy Uniform Guidance 2 CFR 200: <u>https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl</u>;

12-1: Grant Application Process;

12-2: Sponsored Grants & Contracts Budgeting/Accounting/Reporting

VII. Consequences of Non-Compliance

Sponsored Research proposals that do not adhere to the Cost Sharing Requirements of the College will not be approved for submission to the granting agency.