

Direct Charging Administrative and Clerical Costs under the Uniform Guidance

RAC Forum

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Old Rule (A-21)

- Administrative and clerical costs are expected to be paid from indirect costs
- *However*, these costs may be direct charged when in the case of a major project under Appendix C of A-21:
 - PI can show that costs can be tracked – “directly associated with the PI’s sponsored project
 - Necessary to carry out technical objects
 - “Above and beyond the normal support” provided by the PI’s department

Examples of Major Projects

- Large complex programs such as General Clinical Research Centers or Primate Centers
- Projects that require making travel and meeting arrangements for large numbers of participants, such as conferences and seminars
- Projects whose principal focus is the preparation and production of manuals and large reports or books
- Projects that are geographically inaccessible to normal departmental administrative services

Administrative and Clerical Salaries (Uniform Guidance)

- Still generally expected to be paid from indirect costs
- *However*, these costs may be direct charged when:
 - Administrative or clerical services are “integral” to the project
 - Individual is specifically identified
 - Included in sponsor approved budget or other written approval
 - Not also included as indirect cost

SPO Review of Administrative and Clerical Salaries

- Budget justification must explain why admin/clerical services are essential/indispensable for success of project and above and beyond normal departmental service
- Staff members effort should be significant, e.g., at least 10% over one budget year. Fed sponsor will decide.

Post-award Considerations

- If costs were not included in proposal, PI should not charge admin/clerical costs until SPO obtains federal sponsor approval.
- Admin/clerical staff members with project effort on must report/certify the effort in the campus Effort Reporting System

Programmatic Salary Costs

- Costs related to –
 - Protocol development and maintenance
 - Managing substances/chemicals
 - Managing and securing project-specific data
 - Coordination of research subjects
- Can be direct charged if “contributing and directly related to” work under an agreement
- Not subject to same approval requirements as administrative and clerical salaries