

UNIVERSITY OF NEVADA, LAS VEGAS FACILITIES AND ADMINISTRATIVE COST POLICY FOR EXTERNALLY-FUNDED PROJECTS

1.0 Policy

2.0 Exceptions to the Application of F&A Costs to Externally-Funded Projects

3.0 Requests for Exceptions

4.0 Reporting

1.0 POLICY

1.1 It is the policy of the University of Nevada, Las Vegas to collect the full applicable rate of facilities and administrative (F&A) cost reimbursement on all externally funded projects, including research, public service, training and instruction grants and contracts.

1.2 For all projects funded by federal agencies, or funded with federal dollars (including federal dollars passed through other agencies), state and local agencies, private industry and foundations the applicable rate is based upon the University's current federally negotiated F&A cost rate agreement. The only exception to the negotiated rate is for those programs where a lower rate is specified/mandated and published in the sponsored program announcement. If an agency leaves the F&A cost rate silent, the current negotiated F&A cost rate will be applied.

1.3 Any requests for an exception of the applicable F&A cost rate must follow the exception process described in Section 3.0. Exception requests must be submitted to the appropriate Dean's office for review/endorsement and routed to the Office of Research and Graduate Studies for final determination. Documentation concerning the request must then be attached to the proposal routing form and submitted to the Office of Sponsored Programs prior to proposal submission.

2.0 EXCEPTIONS TO THE APPLICATION OF F&A COSTS TO EXTERNALLY-FUNDED PROJECTS

UNLV policy concerning recovery of F&A costs is to recover these costs at the applicable University negotiated rate for the type of project. However, it is acknowledged that agency limitations and other situational considerations identified below may make it acceptable for the University to contribute some or all of these costs in support of an individual project:

2.1 Exceptions Based on Sponsor Policy - The University will accept the sponsor's published policy regarding F&A if: a) the sponsor has a formal, published policy regarding the reimbursement of F&A costs, or b) the sponsor provides written certification of their F&A cost rate policy regarding a specific program, or c) the sponsor provides written certification of their F&A cost policy as applicable to all higher education institutions. This documentation must be included with the submission of the proposal, grant application, or contract to the Office of Research and Graduate Studies.

2.2 Reducing F&A Recovery to Meet Required Cost-Sharing - Contributing some or all recoverable F&A costs to meet cost-sharing requirements may be justified if all other cost-sharing options have been exhausted and the specifically documented benefits to the institution overall are compelling. The Office of Sponsored Programs will determine the necessity of contributing recoverable F&A costs during project budget development and approve if appropriate.

2.3 Discretionary Reductions of F&A Recovery - Requests for partial or total reduction of F&A recovery for projects that will allow recovery at the full audited rate are assumed to be very rare, but will be considered on a case-by-case basis and decided based upon compelling justification. Any discretionary reduction of F&A recoveries will be listed as voluntary cost sharing.

3.0 REQUESTS FOR EXCEPTIONS

3.1 Exceptions to this policy will only be granted in rare circumstances.

3.2 All exception requests must be made using the Office of Sponsored Programs Routing Form. The Routing Form is forwarded to the appropriate Dean, who, in consultation with the department chair, may elect to support or deny the request. If supported by the Dean, the Routing Form and any accompanying documentation must be routed to the Vice President for Research and Graduate Studies or his/her designee for final consideration. All documentation must then be attached to the proposal package and submitted to the Office of Sponsored Programs prior to proposal submission. A copy of the all documentation/approvals will remain on file in the Office of Sponsored Programs for post-award management, certification of cost sharing, and for audit purposes. Any consideration for other projects or grants will require a separate approval process.

3.3 The Vice President for Research and Graduate Studies or his/her designee will make the final decision on any F&A reductions.

3.4 The Vice President for Research and Graduate Studies will monitor the cost to the University of approved F&A cost exceptions on a continuing basis. Exception approvals will be reviewed with the applicable Dean on a quarterly basis.

4.0 REPORTING

The Office of Sponsored Programs will include all F&A reduction in the grants database and calculate the collection of F&A relative to the full negotiated F&A rate for regular (quarterly and annual) reporting to administration. As a rule of thumb, the calculated collection of F&A should be no less than 70-75% of the negotiated rate.