

 <p>Category: COM Research</p> <p>Applicable for: COM Faculty/Staff</p>	<p>COLLEGE OF MEDICINE Operating Procedure/Guideline</p> <p>Waiver of Indirect/Facilities & Administrative (F&A) Costs</p> <p>Effective Date: 10/01/2013</p> <p>Prior Effective Date: N/A</p>	<p>Document Owner: COM Sr. Associate Dean for Research</p> <p>Responsible Office: COM Dean</p>
--	--	--

Background

The College of Medicine (the College) recognizes that ultimate approval authority of any request for Facilities & Administrative (F&A) waivers lies with the University of Cincinnati Vice President for Research. This guideline is intended to outline the general circumstances under which the College of Medicine will be supportive of such a request, and sign off on the *Indirect Cost (F&A) Waiver Request Form*.

In general, the College expects that all requests for external sponsorship of projects and programs will include full cost recovery. Full cost includes both the direct costs attributable to the project or program (i.e. costs that can be readily and specifically identified with a particular project relatively easily and with a high degree of accuracy), and indirect costs (costs that are incurred for common and joint objectives and which cannot easily be directly attributed to an individual project). Indirect costs are costs broadly incurred by the Department, College, and University that are associated with facilities and administration. For Federal sponsors, the University has a negotiated rate agreement that governs the F&A rate that should be applied to sponsored projects, based on the type and location of project activity.

For non-Federal sponsors, there is no universally applicable pre-negotiated agreement. There is also often variability in what sponsors will allow or expect. Even certain Federal programs will occasionally deviate from the established agreement. This guideline is an attempt to outline how some of these more common occurrences will be handled.

A “waiver request” is required for any sponsored project proposing F&A at anything less than what is on the Federally negotiated rate agreement for the type and location of activity.

Guideline

The College will favorably consider F&A waiver requests under the following circumstances.

- A Federal or non-profit sponsor has a published restriction or limitation. (i.e. Funding Opportunity Announcement, Program Guideline, web site)
- A program has a published limitation on “total” costs such that application of full rates would result in insufficient direct cost dollars to carry out a meaningful project.
- Award is being transferred from another institution and a waiver is required to assure direct cost equivalency to the Principal Investigator, based on the limitation of funds in the original award.
- Proposal is for “seed” or “pilot” funding that will offset existing or already planned direct expenditures and will likely lead to larger, fully funded awards.
- Proposal is for community-based or education-related (e.g. stipends, traineeships, fellowships, etc.) activity.
- Proposal requests less than \$25,000 in total costs.
- Proposal is part of a multi-site project where there is documented evidence that all sub-sites have agreed to a fixed amount or rate.
- Proposal is to a sponsor that permits, and the budget includes, what are normally “indirect” costs as “direct” costs.
- The proposal is for “gap” or “bridge” funding, offsetting existing unfunded costs.
- The department is going undertake the proposed project (and incur the stated direct costs) regardless of the funding from any particular sponsor, and therefore the availability of any external funds can be viewed as an offset to existing commitments.

This is a non-exhaustive list. There may other circumstances where a waiver will be favorably considered. Similarly, the presence of one or more of these conditions does not necessarily guarantee that a waiver will be approved by the College, or ultimately the Vice President of Research.

For any awards where a waiver is granted, and the University is permitted to retain any unspent funds (such as under fixed fee agreements), the College retains the right to retroactively assess up to the full F&A rate should a balance remain at the end of the project.

Procedure

All F&A waiver requests should include the amount of the request, significance of the proposed project, and the consequences of accepting or denying the waiver. Requests

will generally be made on the *Indirect Cost (F&A) Waiver Request Form* as part of the normal routing process for sponsored projects.

Waiver requests will only be considered if already approved by the appropriate Department Chair and senior Department Administrator.

The primary designated signatory for the Dean of the College of Medicine on waiver requests is the Associate Dean, College of Medicine Research Operations. Additional authorized signatories are the Sr. Associate Dean for Research, Sr. Associate Dean for Operations and Finance, and Associate Dean, Operations and Finance.

Related Links

[Indirect Cost \(F&A\) Waiver Request Form](#)

[Sponsored Research Services](#)

[Government Cost Compliance](#)

Phone Contacts

College of Medicine Dean's Office	558-2338