On December 26, 2014, the federal government implemented new guidelines for the management of grants, referred to as the Uniform Guidance (2 CFR §200), that replaced OMB Circulars A-21, A-110 and A-133. Awards issued prior to this date will continue to be managed under OMB Circulars. This document is applicable to grants awarded after December 26, 2014 and references the Uniform Guidance.

PURPOSE

San Francisco State University (SF State) has a multi-year Facilities and Administrative (F&A/Indirect Cost) rate agreement with the federal government. This agreement specifies the F&A cost rates to be applied to awards from both federal and non-federal sponsors. The F&A/Indirect Cost agreement is available on our website:


Exceptions to these rates occur when a funding agency places a cap on the F&A rate. In this case, the Office of Research and Sponsored Programs (ORSP) must have written guidelines from the funding agency stating that there is a limit on F&A costs.

The chart below outlines the indirect cost policy for both the University and the UCORP, and the approvals needed for exemptions. Please note that Principal Investigators are not authorized to negotiate F&A with sponsors.

<table>
<thead>
<tr>
<th>University Rates</th>
<th>If pre-approval needed (prior to budget development and routing)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federally negotiated rates</td>
<td>No action needed</td>
</tr>
<tr>
<td>Capped IDC in written proposal guidelines (any rate greater than zero)</td>
<td>No action needed</td>
</tr>
<tr>
<td>NO IDC allowed under written funder guidelines</td>
<td>Needs Dean AND AVP of ORSP approvals</td>
</tr>
<tr>
<td>NO published rate</td>
<td>ORSP contacts sponsor</td>
</tr>
<tr>
<td></td>
<td>Needs Dean AND AVP of ORSP approvals</td>
</tr>
<tr>
<td>PI asks for a lower rate than published rate or federally negotiated rate, i.e. foregone IDC</td>
<td>Needs Dean AND AVP of ORSP approvals</td>
</tr>
</tbody>
</table>
### UCORP Rates

<table>
<thead>
<tr>
<th>IDC rate 15% or higher</th>
<th>If pre-approval needed (prior to budget development and routing)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No action needed</td>
<td>Needs UCORP Director approval</td>
</tr>
<tr>
<td>OR</td>
<td>Dean to make up difference between the allowable IDC and the 15% UCORP required IDC</td>
</tr>
</tbody>
</table>

Per Section F in §200.414, Sub-recipient institutions that do not have a negotiated indirect cost rate may elect to charge a de minimis rate of 10% on the subaward. This rate does not apply to foreign subaward (use rate that is supported by sponsoring agency for foreign subaward).

### DEFINITIONS

**On-Campus**: A project, or part of a project, is considered to be performed on-campus if the activity is conducted on SF State property and the majority of the F&A costs (operation and maintenance, depreciation or lease of buildings, equipment and improvements, etc.) associated with the University's facilities is applicable. If the project is not charged directly for the lease/rental costs and the lease is a part of SF State’s F&A rate, then the project is considered on-campus.

**Off-Campus**: For all activities performed in facilities not owned by the institution and to which rent is directly allocated to the project(s), the off-campus rate will apply. Actual costs will be apportioned between on-campus and off-campus components. Each portion will bear the appropriate rate.

**Organized Research**: Appendix III to Uniform Guidance (2 CFR §200), organized research means all research and development activities at SF State that are separately budgeted and accounted for. It includes:

1. **Sponsored Research**: all research and development activities at SF State that are externally sponsored by Federal and non-Federal entities. This term includes activities involving the training of individuals in research techniques (commonly called research training) where such activities utilize the same facilities as other research and development activities and where such activities are not included in the instruction function. Examples include:
   - Awards to faculty to support their research activities, including “Career Development” awards
   - Funding to maintain facilities or equipment, and/or support a facility, used for research

2. **University Research**: means all research and development activities that are separately budgeted and accounted for by SF State under an application of institutional funds. Examples include:
   - Cost sharing
• Institutional funds distributed through a competitive process, where the proposed activity is characterized by the same factors that identify a sponsored project

**Instruction:** Appendix III to Uniform Guidance (2 CFR §200), *instruction* includes teaching and training activities at SF State. Except for research training, this term includes all teaching and training activities, whether they are offered for credits toward a degree or certificate or on a non-credit basis, and whether they are offered through regular academic departments or separate divisions, such as a summer school division or an extension division.

Externally sponsored teaching and training activities at SF State, including agreements which support curriculum development. Examples of such projects include:

• Instructing any type of student at any location (SF State students/staff, teachers or students in elementary or secondary schools, the general public, etc.)
• Curriculum development projects, including those evaluating curriculum or teaching methods. Evaluation may be considered "research" if the majority of activity involves data collection, evaluation and reporting.
• Engaging SF State students in community service activities for which they receive academic credit
• Support to write textbooks, reference books, video, or software to be used as instructional materials

**Other Sponsored Activities:** Appendix III to Uniform Guidance (2 CFR §200), *other sponsored activities* means programs and projects funded by Federal and non-Federal entities in which activities involve the performance of work other than instruction and organized research. Examples include:

• Travel grants (other than travel to support research activities)
• Support for conferences, symposia, or public events
• Support for student participation in community service *that does not earn academic credit*
• Support for projects related to library collections, cataloguing, acquisitions, bibliographies
• Programs to enhance institutional resources (computer system upgrades)

**RELATED DOCUMENTS**
Facilities & Administrative Costs Rate Agreement