UNIVERSITY OF ALASKA
UNIFORM GUIDANCE WORKING GROUP

Section Number & Name: 200.306 Cost sharing or matching
Old Language: A110.C23

BACKGROUND INFORMATION:

A. Does the revised guidance contain new language? ☒ Y ☐ N

Specifically describe the new language and how it differs:

Cost Sharing or Matching clarifies policies on voluntary committed cost sharing to ensure that such cost sharing is only solicited for research proposals when required by regulation and transparent in the notice of funding opportunity, notes voluntary committed cost sharing is prohibited for Federal research proposals except where otherwise required by statute:

- Clarifies policies on voluntary committed cost sharing
- Stipulates that voluntary committed cost sharing is not expected under Federal research proposals and cannot be used as a factor during the merit review of the proposal
- Cost sharing may only be considered when required by regulation and transparent in the notice of funding opportunity
- Only mandatory cost sharing or cost sharing included on the project budget must be included in the organized research base for computing the indirect cost rate or reflected in the allocation of indirect costs
- OMB Memorandum 01-06, Clarification of OMB ***A-21*** Treatment of Voluntary Uncommitted Cost Sharing and Tuition Remission costs continues to apply.
    - See: http://www.whitehouse.gov/omb/memoranda_m01-06
- Valuation of the cost sharing remains largely unchanged from OMB A-110

B. Is the new guidance more or less restrictive than university processes? ☐ More ☐ Less

Specifically describe how it is more or less restrictive:

_____

C. Cite any relevant system-wide policies/regulations/procedures:
Accounting and Administrative Manual D-01 Matching/Cost Sharing Concepts

D. Cite any MAU-level relevant processes or manuals:
None found

E. Is there an impact to electronic systems (Banner HR/Finance, Web Timesheets, Effort Reporting, etc.)? ☐ Y ☒ N

List specific system(s) impacted and method of impact:

ACTION PLAN: Is specific action needed? ☒ Y – see below ☐ N – no action needed

1. Update Accounting and Administrative Manual D-01 Matching/Cost Sharing Concepts for new Uniform Guidance citations.
2. Document Understanding of tracking mandatory and voluntary committed cost sharing in Banner to ensure that the amounts are captured in the appropriate F&A base when calculating the rates.

UA responsible area requiring documentation of compliance: Andrew Gray, Tana Mystol, Tanya Hollis, Rosemary Madnick, Heather Paulsen, Barbara Hyde

200.306 Cost sharing or matching.

(a) Under Federal research proposals, voluntary committed cost sharing is not expected. It cannot be used as a factor during the merit review of applications or proposals, but may be considered if it is both in accordance with Federal awarding agency regulations and specified in a notice of funding opportunity. Criteria for considering voluntary committed cost sharing and any other program policy factors that may be used to determine who may receive a Federal award must be explicitly described in the notice of funding opportunity. Furthermore, only mandatory cost sharing or cost sharing specifically committed in the project budget must be included in the organized research base for computing the indirect (F&A) cost rate or reflected in any allocation of indirect costs. See also §§200.414 Indirect (F&A) costs, 200.203 Notices of funding opportunities, and Appendix I to Part 200—Full Text of Notice of Funding Opportunity.

(b) For all Federal awards, any shared costs or matching funds and all contributions, including cash and third party in-kind contributions, must be accepted as part of the non-Federal entity's cost sharing or matching when such contributions meet all of the following criteria:

(1) Are verifiable from the non-Federal entity's records;

(2) Are not included as contributions for any other Federal award;

(3) Are necessary and reasonable for accomplishment of project or program objectives;

(4) Are allowable under Subpart E—Cost Principles of this part;

(5) Are not paid by the Federal government under another Federal award, except where the Federal statute authorizing a program specifically provides that Federal funds made available for such program can be applied to matching or cost sharing requirements of other Federal programs;

(6) Are provided for in the approved budget when required by the Federal awarding agency; and

(7) Conform to other provisions of this part, as applicable.

(c) Unrecovered indirect costs, including indirect costs on cost sharing or matching may be included as part of cost sharing or matching only with the prior approval of the Federal awarding agency. Unrecovered indirect cost means the difference between the amount charged to the Federal award and the amount which could have been to the Federal award under the non-Federal entity's approved negotiated indirect cost rate.

(d) Values for non-Federal entity contributions of services and property must be established in accordance with

Deleted: 23 ¶
(

Deleted:)

Deleted: , shall…contributions, must be accepted as part of the recipient's…on-Federal entity's cost sharing or matching when such contributions meet all of the following crite… [1]

Deleted: (1) …re verifiable from the recipient's…on-Federal entity's records. … [2]

Deleted: ¶
(2) …re not included as contributions for any other federally-assisted project or program. … [3]

Deleted: ¶
(3) …re necessary and reasonable for proper and efficient accomplishment of project or program objectives. … [4]

Deleted: ¶
(4) …re allowable under the applicable cost principles. … [5]

Deleted: ¶
(5) …re not paid by the Federal government under another Federal award, except where authorized by…he Federal statute to be used for cost sharing or matching. … [6]

Deleted: ¶
(6) …re provided for in the approved budget when required by the Federal awarding agency. … [7]

Deleted: ¶
(7) …onform to other provisions of this Circular … [8]

Deleted: (b)

Deleted: ¶
(c) …alues for recipient…on-Federal entity contributions of services and property shall…ust be established in accordance with the applicable cost principles. … [9]

§200.434 Contributions and donations. If a Federal awarding agency authorizes the non-Federal entity to donate buildings or land for construction/facilities acquisition projects or long- term use, the value of the donated property for cost sharing or matching must be the lesser of paragraphs (d)(1) or (2) of this section.

(1) The value of the remaining life of the property recorded in the non-Federal entity's accounting records at the time of donation.

(2) The current fair market value. However, when there is sufficient justification, the Federal awarding agency may approve the use of the current fair market value of the donated property, even if it exceeds the value described in (1) above at the time of donation.

(e) Volunteer services furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as cost sharing or matching if the service is an integral and necessary part of an approved project or program. Rates for third-party volunteer services must be consistent with those paid for similar work by the non-Federal entity. In those instances in which the required skills are not found in the non-Federal entity, rates must be consistent with those paid for similar work in the labor market in which the non-Federal entity competes for the kind of services involved. In either case, paid fringe benefits that are reasonable, necessary, allocable, and otherwise allowable may be included in the valuation.

(f) When a third-party organization furnishes the services of an employee, these services must be valued at the employee's regular rate of pay plus an amount of fringe benefits that is reasonable, necessary, allocable, and otherwise allowable, and indirect costs at either the third-party organization's approved federally negotiated indirect cost rate or, a rate in accordance with §200.414 Indirect (F&A) costs, paragraph (d), provided these services employ the same skill(s) for which the employee is normally paid. Where donated services are treated as indirect costs, indirect cost rates will separate the value of the donated services so that reimbursement for the donated services will not be made.

(g) Donated property from third parties may include such items as equipment, office supplies, laboratory supplies, or workshop and classroom supplies. Value assessed to donated property included in the cost sharing or matching share must not exceed the fair market value of the property at the time of the donation.

(h) The method used for determining cost sharing or matching for third-party-donated equipment, buildings and land for which title passes to the non-Federal entity may differ according to the purpose of the Federal award, if paragraph (h)(1) or (2) of this section applies.

(1) If the purpose of the Federal award is to assist the non-Federal entity in the acquisition of equipment, buildings or land, the aggregate value of the donated property may be claimed as cost sharing or matching.

(2) If the purpose of the Federal award is to support activities that require the use of equipment, buildings or land, normally only depreciation charges for equipment and buildings may be made. However, the fair market value of equipment or other capital assets and fair rental charges

Deleted: recipients…he non-Federal entity to donate buildings or land for construction/facilities acquisition projects or long- term use, the value of the donated property for cost sharing or matching shall…ust be the lesser of (…aragraphs (d)(1) or (2). … [10]

Deleted: ¶
(1) …he certified…value of the remaining life of the property recorded in the recipient's … [11]

Deleted: certified …alue described in (1) above at the time of donation to the project … [12]

Deleted: d…) Volunteer services furnished by third-party professional and technical personnel, consultants, and other skilled and unskilled labor may be counted as cost sharing or matching if the service is an integral and necessary part of an approved project or program. Rates for third-party volunteer services shall…ust be consistent with those paid for similar work in…y the recipient's organization….on-Federal entity. In those instances in which the required skills are not found in the recipient organization…on-Federal entity, rates shall…ust be consistent with those paid for similar work in the labor market in which the recipier … [13]

Deleted: ¶
(e…f) When an employer other than the recipient… third-party organization furnishes the services of an employee, these services shall…ust be valued at the employee's … [14]

Deleted: ¶
(f…g) Donated supplies…roperty from third parties may include such items as expendable …quipment, office supplies, laboratory supplies, or workshop and classr … [15]

Deleted: ¶
(g…h) The method used for determining cost sharing or matching for third-party-donated equipment, buildings and land for which title passes to the recipient…on-Feder … [16]

Deleted: recipient…on-Federal entity in the acquisition of equipment, buildings or land, the total … [17]

Deleted: or use …harges for equipment and buildings may be made. However, the full … [18]

for land may be allowed, provided that the Federal awarding agency has approved the charges. See also §200.420 Considerations for selected items of cost.

(j) The value of donated property must be determined in accordance with the usual accounting policies of the non- Federal entity, with the following qualifications:

(1) The value of donated land and buildings must not exceed its fair market value at the time of donation to the non- Federal entity as established by an independent appraiser (e.g., certified real property appraiser or General Services Administration representative) and certified by a responsible

official of the non-Federal entity as required by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) (Uniform Act) except as provided in the implementing regulations at 49 CFR part 24.

(2) The value of donated equipment must not exceed the fair market value of equipment of the same age and condition at the time of donation.

(3) The value of donated space must not exceed the fair rental value of comparable space as established by an independent appraisal of comparable space and facilities in a privately-owned building in the same locality.

(4) The value of loaned equipment must not exceed its fair rental value.

(j) For third-party in-kind contributions, the fair market value of goods and services must be documented and to the extent feasible supported by the same methods used internally by the non-Federal entity.

Deleted: h

Deleted: shall

Deleted: recipient

Deleted: .

Deleted: shall

Deleted: recipient

Deleted: official of the recipient.

Deleted: ¶
(2)

Deleted: shall

Deleted: ¶
(3)

Deleted: shall

Deleted: ¶
(4)

Deleted: shall

Deleted: ¶
(5) The following requirements pertain to the recipient's supporting records for

Deleted: from third parties.¶
¶
(i) Volunteer

Deleted: shall

Deleted: ,

Deleted: ,

Deleted: recipient for its own employees.

Deleted: ¶
(ii) The basis for determining the valuation for personal service, material, equipment, buildings and land shall be documented.¶

Page 1: [1] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

, shall

(a)

Page 1: [1] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

, shall

(b)

Page 1: [1] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

, shall

(c)

Page 1: [2] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(1)

(1)

Page 1: [2] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(1)

(2)

Page 1: [2] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(1)

(3)

Page 1: [3] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(2)

(4)

Page 1: [3] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(2)

(5)

Page 1: [4] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(3)

(6)

Page 1: [4] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(3)

(7)

Page 1: [4] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(3)

(8)

Page 1: [5] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(4)
(9)

Page 1: [5] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(4)
(10)

Page 1: [6] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(5)
(11)

Page 1: [6] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(5)
(12)

Page 1: [6] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(5)
(13)

Page 1: [7] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(6)
(14)

Page 1: [7] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(6)
(15)

Page 1: [8] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(7)
(16)

Page 1: [8] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(7)
(17)

Page 1: [9] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(c)
(d)

Page 1: [9] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(c)
(e)

Page 1: [9] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(c)
(f)

Page 1: [9] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(c)
(g)

Page 2: [10] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

recipients

Page 2: [10] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

recipients

Page 2: [10] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

recipients

Page 2: [10] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

recipients

Page 2: [11] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(1)
(1)

Page 2: [11] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(1)
(2)

Page 2: [11] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(1)

(3)

Page 2: [12] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

certified

Page 2: [12] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

certified

Page 2: [13] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

d

Page 2: [13] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

d

Page 2: [13] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

d

Page 2: [13] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

d

Page 2: [13] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

d

Page 2: [13] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

d

Page 2: [13] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

d

Page 2: [13] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

d

Page 2: [14] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(e

Page 2: [14] Deleted **Christi F Eickholt** **8/28/2014 12:57:00 PM**

(e

Page 2: [14] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(e

Page 2: [14] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(e

Page 2: [14] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(e

Page 2: [14] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(e

Page 2: [14] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(e

Page 2: [15] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(f

Page 2: [15] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(f

Page 2: [15] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(f

Page 2: [15] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(f

Page 2: [15] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(f

Page 2: [16] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(g

Page 2: [16] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(g

Page 2: [16] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(g

Page 2: [16] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

(g

Page 2: [17] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

recipient

Page 2: [17] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

recipient

Page 2: [18] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

or use

Page 2: [18] Deleted	**Christi F Eickholt**	**8/28/2014 12:57:00 PM**

or use