Allowability Quick Reference Guide

The attached slides provide a quick reference guide for the most common expenses incurred in operating AURA centers. These slides are intended to be advisory and in many cases a more detailed review of cost items will be necessary.



ADVERTISING AND ALCOHOL

Allowable Advertising

- Recruitment of personnel required for performance of Federal award
- Procurement of goods & services for the performance of the award
- Disposal of scrap or surplus acquired in the performance of award

Allowable Public Relations

- Costs are specifically required by award
- Costs of communicating with the press pertaining to accomplishments which resulted from the performance of an award
- Cost of keeping the public informed on matters of public concern . . . such as notices of contract/grant awards . . . etc.

Specifically unallowable:

- Costs of promotional items, memorabilia, gifts and souvenirs
- Costs of advertising and public relations designed solely to promote the organization

Costs of alcoholic beverages

are unallowable!





COMMUNICATION

• Costs incurred for telephone services, local and long distance telephone calls, telegrams, postage, messenger, electronic or computer transmittal services <u>and the like</u> <u>are allowable</u>.

27



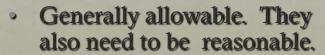
August 2010



COMPENSATION

- Includes all compensation paid currently or accrued by the organization during the period of the award.
 Compensation costs <u>are</u> <u>allowable when</u>:
 - Reasonable
 - Consistent/Allocable
 - Adequately documented

Fringe benefits





28

- Includes expenses such as, Annual Leave, Sick Leave, Holiday, Social Security, Workers Comp., Pension, UI, etc.
- Employer contributions are allowable when paid in accord with established written policies.



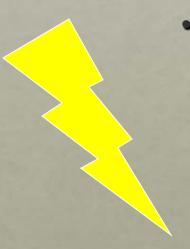
SUPPORT FOR TIME AND EFFORT

Support of salaries and wages

- Personnel Activity Reports or Time Distribution Reports
 - <u>Must</u> reflect after-the-fact determination of activity (not budget estimates).
 - <u>Must</u> account for total activity for which employee is compensated.
 - <u>Must</u> be signed by the employee or responsible supervisor.
 - Must be prepared at least monthly and coincide with one or more pay periods.



CONTINGENCY PROVISIONS



• Contributions to a contingency reserve, or any similar provision, made for events the occurrence of which cannot be foretold with certainty as to time, intensity, or with an assurance of their happening are unallowable.

• Exceptions might be self-insurance, pension funds and reserves for normal severance pay.



DEPRECIATION AND USE ALLOWANCES

Are Allowable

- A combination of the two methods may not be used in connection with a single class of fixed assets (e.g., buildings, office equipment, computer equipment)
- Computation of use allowance or depreciation will exclude:
 - Cost of land
 - Any portion donated by Federal Government
 - Any matching portion

- Computation of use allowance or depreciation shall be based on acquisition cost. Acquisition cost of a donated asset shall be the fair market value at the time of donation
- Maximum use allowance
 - Buildings and improvements= 2% of acquisition cost
 - Equipment = 6 2/3% of acquisition cost



INVENTORY

 Adequate property records must be maintained under either method Physical inventories must be taken at least once every two years



DONATIONS AND CONTRIBUTIONS

Contributions or donations <u>rendered</u>, including cash, property, and services, made by the organization, regardless of the recipient, are unallowable



DONATED SERVICES RECEIVED

- The value of <u>donated services</u>, <u>goods</u>, <u>or space</u> received <u>is not reimbursable either as a direct or indirect cost</u>.
- However, the value of donated services, goods or space may be used to meet cost sharing or matching requirements.



EMPLOYEE MORALE, HEALTH & WELFARE COSTS

- Examples In-house publications, health clinics, recreational activities, etc.
- Costs are allowable if:
 - In accord with established practice
 - Reasonable
 - Equitably distributed to all activities
 - Offset by income earned





ENTERTAINMENT

Costs of entertainment, including amusement, diversion and social activities and costs relating to these activities such as tickets, meals, lodging, rentals, transportation and gratuities are unallowable.





EQUIPMENT & OTHER CAPITAL EXPENDITURES (CONT)

- Equipment and Capital
 Expenditures are <u>Unallowable</u>

 as indirect costs.
- Prior approval from the awarding agency must be obtained to direct charge.



Equipment - an article of non expendable, tangible personal property having a useful life of more than one year and an acquisition cost equal to or greater than the lesser of:

- The organization's financial statement capitalization level or
- \$5,000

Capital Expenditures – expenses for the acquisition cost of capital assets or expenses for improvements that materially increase the value of the capital asset.



FINES AND PENALTIES

- Costs of failures to comply with Federal, state, or local laws are unallowable.
- Allowable if incurred as a result of compliance with specific provisions of an award or instructions in writing from the awarding agency.



FUND RAISING AND INVESTMENT MANAGEMENT COSTS

- Fund raising and similar expenses incurred to solely to raise capital or obtain contributions are unallowable
- Costs of investment counsel & staff and similar expenses are unallowable
- Fund raising and investment activities <u>shall be</u> allocated an appropriate share of indirect costs

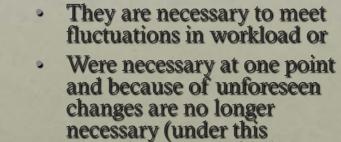


GOODS OR SERVICES FOR PERSONAL USE HOUSING AND IDLE FACILITIES

that:

Housing and Personal Living Expenses:

- Unallowable as an indirect cost or fringe benefit regardless of whether it is reported by the employee as taxable income.
- Allowable as direct if necessary and approved by the awarding agency.



necessary (under this exception, costs of idle facilities are allowable for a reasonable period of time, ordinarily not to exceed one year)

<u>Unallowable except</u> to the extent

 Goods or Services for Personal Use: <u>Unallowable</u> regardless of whether the cost is reported as taxable income.



INSURANCE AND INDEMNIFICATION

- Insurance required or approved <u>pursuant to an award is</u> <u>allowable</u>.
- Insurance carried by the organization in general conduct of business is allowable subject to the following limitations:
 - Reasonable coverage
 - Cost of insurance on officers must represent additional compensation and the organization may not be identified as the beneficiary
 - Other miscellaneous items



INSURANCE AND INDEMNIFICATION

- Indemnification includes <u>securing the</u> <u>organization against liabilities to third parties</u> <u>and other loss or damage, not compensated by insurance.</u>
- The Federal government is obligated to indemnify the organization only to the extent expressly provided in the award.



INTEREST

Generally unallowable. See item #23 of the Circular for more details.



LABOR RELATIONS COSTS

Costs of maintaining satisfactory relations with employees, including labor management committees, employee publications and other related activities <u>are allowable</u>.





LOBBYING (1 OF 3)

• Unallowable:

- Attempts to influence election outcomes
- Contributing to political causes
- Attempts to influence Federal or State legislation through virtually any communicative device
- Legislative liaison activities when performed in support of unallowable lobbying





LOBBYING (CONT.)

· Allowable:

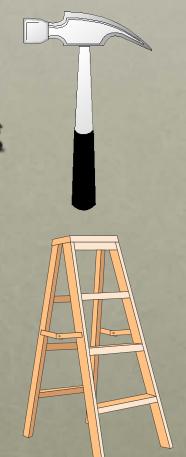
- Providing a technical presentation on a topic directly related to the performance of an award
- Any activity specifically authorized by statute to be accomplished
- Indirect Cost Proposals (ICP) must separately identify lobbying costs and treat them <u>as unallowable</u>
- Nonprofits <u>must</u> provide a "Lobbying Certification" with their annual ICP

Organizations shall maintain adequate records to demonstrate the determination of costs as allowable or unallowable in accord with Circular A-122.



MAINTENANCE AND REPAIRS

- Costs necessary to keep buildings and equipment in <u>efficient operating</u> condition are <u>allowable</u>.
- Costs which add to the permanent value or appreciably prolong the life of the asset shall be treated as capital expenditures.

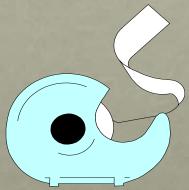




MATERIALS AND SUPPLIES

- M/S costs necessary to carry out a Federal award are allowable
- M/S must be charged at their actual prices, net of applicable credits
- M/S costs may be allowable as direct or indirect







MATERIALS AND SUPPLIES (CONT.)

- Only materials and supplies <u>actually used for the</u> <u>performance of a Federal award may be charged as direct</u> <u>costs</u>.
- Where federally-donated or furnished materials are used in performing the Federal award, such materials will be used without charge.



MEETINGS AND CONFERENCES

- Costs of meetings and conferences, the primary purpose of which is the <u>dissemination of technical information</u>, are allowable
- Costs <u>include</u> meals, transportation, rental of facilities, speakers' fees, and other items incidental to the meeting or conference
- Caveat Entertainment & Participant support costs



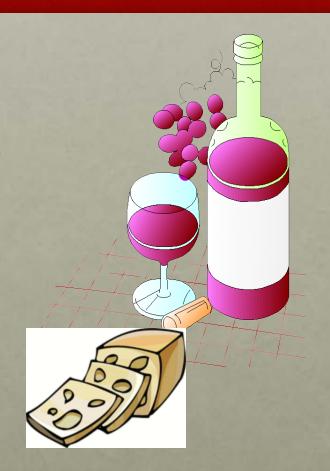
MEMBERSHIPS, SUBSCRIPTIONS AND PROFESSIONAL ACTIVITY COSTS

- Membership in business, technical and professional organizations are allowable
- Subscriptions to business, technical and professional periodicals <u>are allowable</u>
- Costs of memberships in civic or community organizations are allowable with prior approval by the cognizant Federal agency.



MEMBERSHIPS, SUBSCRIPTIONS AND PROFESSIONAL ACTIVITY COSTS (2 OF 2)

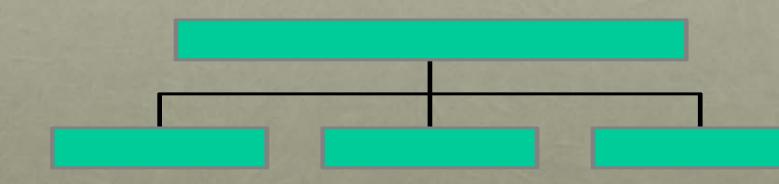
• Memberships in country, social, or dining clubs <u>are unallowable.</u>





ORGANIZATION COSTS

 All costs of organization or reorganization <u>are unallowable except</u> with prior approval of the awarding agency.





PARTICIPANT SUPPORT COSTS

These costs include stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with meetings, conferences, symposia, or training projects and are allowable as direct costs with the prior approval of the awarding agency.



PRE-AGREEMENT COSTS

- Pre-award costs are costs incurred <u>prior to the effective</u> date of the award directly pursuant to the negotiation of the award.
- Such costs are allowable only to the extent that they would have been <u>allowable if incurred after the</u> <u>effective date of the award and only with the written approval of the awarding agency</u>.



PROFESSIONAL SERVICE COSTS



 Costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill, and who are not officers or employees of the non-profit organization, are generally allowable if reasonable and not contingent on recovery of costs from the Federal government.



PUBLICATION AND PRINTING

• Generally allowable and include page charges in professional publications.



RECRUITING

- Generally, advertising and associated costs incurred for recruitment of staff are allowable but
 - They must meet the test of reasonableness and
 - They must conform with established practices of the organization

Help Wanted



RENTAL COSTS

 Rental costs are generally allowable if reasonable. See item # 43 of the Circular for more details. Office Space For Rent Phone 634-5789



TAXES

- Taxes are generally allowable except for:
 - Taxes from which exemptions are available
 - Special assessments on land which represent capital improvements and
 - Federal income taxes

 Applicable credits (offsets to taxes) must be taken where appropriate.

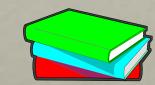


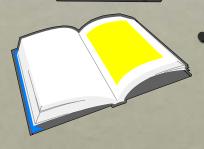
TERMINATION COSTS APPLICABLE TO SPONSORED AGREEMENTS

- Termination of awards generally give rise to costs which would not have arisen had the award not been terminated.
- Reasonable and customary costs of terminating an award are generally allowable. Review additional details in the Circular # 48.

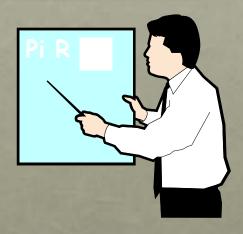


TRAINING COSTS





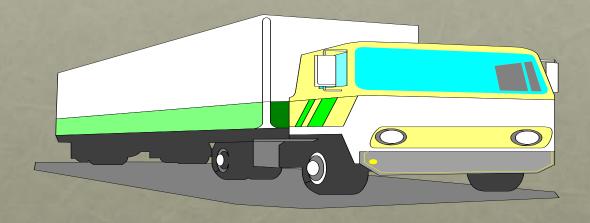
 Generally, training and education costs related to employee development, such as, workshops, textbooks, classes, etc. <u>are allowable</u>





TRANSPORTATION

- Allowable as direct if provided for in the award
- Allowable as indirect for equitable distribution to all benefiting activities





TRAVEL



- Expenses for transportation, lodging, subsistence, and related items incurred by employees on official business are allowable.
- Such costs may be charged on an actual basis, per diem or mileage basis or a combination, but must be consistent with those normally allowed by the organization.



TRUSTEES

Travel and subsistence of trustees (or directors) are allowable, noting restrictions for travel costs (#51).

