A-81 (UNIFORM GUIDANCE) GUIDE

APPLICABILITY

This guidance applies to all federal awards effective on or after December 26, 2014, whereby the Uniform Guidance is referenced and incorporated. Most federal agencies are incorporating A-81 at the time additional funding is received and/or the terms of the award are modified, consistent with the below:

- All new awards effective on or after December 26, 2014.
- All competitive renewals effective on or after December 26, 2014.
- All non-competitive continuations effective on or after December 26, 2014
- All funding modifications (e.g., revisions, supplements) effective on or after December 26, 2014.

Please refer to the terms and conditions of the federal award to verify whether A-81 applies to a specific award.
<table>
<thead>
<tr>
<th>Administrative and clerical salaries (in certain circumstances) AND programmatic salary costs can be included on competitive proposal budgets.</th>
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</thead>
</table>

**ALLOWABLE?**

**YES, but only if:**

1. Administrative or clerical services are integral (essential, vital, or fundamental) to a project or activity;
2. Individuals involved can be specifically identified with the project or activity;
3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
4. The costs are not also recovered as indirect costs.

**ACTION:**

The proposal's budget justification should explain how anticipated direct charging of administrative/clerical costs are justified using the new criteria. USC does not currently have a definition or percentage FTE guidance for the term integral. Please be detailed in describing how the position is integral (essential, vital, or fundamental) to the project.

**PRIOR APPROVAL NEEDED?**

**YES.** All research proposals that contemplate direct charging of administrative/clerical salary should explicitly address why the salary is integral and include the salary in the applicable budget justification. If the justification and costs were not included in the proposal and approved by the sponsor, prior approval from the sponsor will be needed prior to incurring any such costs.
<table>
<thead>
<tr>
<th>COMPUTING DEVICES (UNDER $5,000 UNIT COST)</th>
<th>Computing devices can be included on competitive proposal budgets.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicable UG Sections:</td>
<td><strong>ALLOWABLE?</strong></td>
</tr>
<tr>
<td></td>
<td><strong>YES</strong>, but only if:</td>
</tr>
<tr>
<td></td>
<td>1. The computing device costs less than $5,000/unit (includes accessories or peripherals for printing, transmitting, receiving, or storing electronic information related to the project).</td>
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<td></td>
<td>2. The computing device is essential to the project because it is necessary to store, analyze, process, and publish data and other information electronically.</td>
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<td>3. The project does not have reasonable access to other devices or equipment that can achieve the same purpose.</td>
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<td>4. The PI and department maintain documentation that described how the proposed computing device meets the requirements.</td>
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<td><strong>ACTION:</strong></td>
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<td></td>
<td>You may include computing devices in a project budget if the circumstances are present for the anticipated project. The Budget Justification should explain why the purchase is appropriate in light of the standards above. Please be detailed in describing how the computing device purchase is essential to the project.</td>
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<td></td>
<td><strong>PRIOR APPROVAL NEEDED?</strong></td>
</tr>
<tr>
<td></td>
<td><strong>NO.</strong></td>
</tr>
</tbody>
</table>
|                                          | **NOTE:** Items costing more than $5,000 per unit are considered equipment and follow federal equipment rules on direct charge allowability.
### Participant Support Costs

**Applicable UG Sections:**
- 200.75
- 200.456

Participant support costs (stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees – but not employees – in connection with conferences or training projects) can be included on competitive proposal budgets that include an education or outreach component, the costs are separately budgeted and the agency approves the cost.

**ALLOWABLE?**

**YES,** but only if:

1. They are programmatically justified.
2. The costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
3. The costs are specifically exempt from F&A.

**ACTION:**

Include the following in the budget justification: “The inclusion of the participant support costs in the budget and the subsequent award by agency will be considered prior agency approval.”

**PRIOR APPROVAL NEEDED?**

**YES,** if the participant support costs were not separately budgeted in the budget and justification.

### Visa Costs

**Applicable UG Section:**
- 200.463D

Short-term, travel visa costs can be included on competitive proposal budgets.

**ALLOWABLE?**

**YES,** but only if:

1. The visa costs can be clearly identified and are directly connected to the work performed on a Federal award.
2. The visa costs must be critical and necessary to the project (e.g., field research, attending meetings in foreign locations, allowing foreign visitors to visit USC in support of a project).

**PRIOR APPROVAL NEEDED?**

**NO.**

**NOTE:** Long-term visa costs, such as those that enable employment at the University (for example “J” and “H1B” visas) are not allowable as direct charges.
### F&A ON SUBAWARDS

**Applicable UG Section:**

200.331

Subrecipient’s negotiated F&A rate must be used in competitive proposals unless the sponsor has a published F&A cap. If the subrecipient does not have a negotiated rate, a 10% de minimus F&A rate must be used by the subrecipient.

This does not vary greatly from current USC policy, except the 10% is a de minimus rate (no less than). The base type to be used by the subrecipient, when using the de minimus 10% rate, is MTDC.

**ACTIONS**

Upon receipt of the subrecipient’s budget for inclusion in the USC proposal, ensure that the F&A rate used is subrecipient’s negotiated rate or if no negotiated rate, no less than 10%. If sponsor has a cap, that cap must be used by USC and the subrecipient.

PIs are not allowed to negotiate or agree to lower rates with their subrecipients.

**NOTE:** There is no change to USC’s recovery of its own F&A – this remains limited to receiving F&A on the first 25k of each subaward.

### FIXED PRICE/RATE SUBAWARDS

**Applicable UG Section:**

200.332

Agency prior approval is required to enter into fixed price/rate subawards, which may not exceed $150K.

**ALLOWABLE?**

**YES,** but only if:

1. The total value of each fixed price/rate subaward does not exceed $150k.
2. An explicit and separate justification statement is added to proposals contemplating a fixed price/rate subaward.

**PRIOR APPROVAL NEEDED?**

**YES.**