



# TEXAS TECH UNIVERSITY HEALTH SCIENCES CENTER EL PASO

## Operating Policy and Procedure

**HSCEP OP:** 65.04, **Allowable Activities and Allowable Costs**

**PURPOSE:** The purpose of this Health Sciences Center El Paso Operating Policy and Procedure (HSCEP OP) is to ensure compliance with federal guidelines for allowable activities and allowable direct costs charged to programs receiving financial support from external sources (sponsored programs).

**REVIEW:** This HSCEP OP will be reviewed May 15 of every odd-numbered year by the Director of Contracts and Grants Accounting (CGA) and the Senior Director of the Office of Sponsored Programs (OSP), with recommendations for revisions submitted to the Vice President for Research and the Chief Financial Officer by June 1.

### **POLICY/PROCEDURES:**

#### **1. Definitions and Background:**

- A. Direct Costs- The Federal Office of Management and Budget (OMB) 2 CFR Part 200.413 defines direct costs as “those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.”
- B. Costs being charged directly to a federally sponsored project fund must, in addition to any program guidelines or statute expense limitations, meet the following OMB 2 CFR Part 200 Subpart E definitions:
  - 1) Allowable- A cost or activity is specifically permitted or not specifically prohibited by the terms and conditions of the award and institutional policy (Refer to Attachment A for a sample list of allowable and unallowable costs).
    - a) An unallowable cost cannot be charged to a sponsored project.
    - b) An unallowable activity cannot be charged to a sponsored project but would also be added to the base modified total direct cost in the indirect cost calculation thereby reducing the rate of indirect cost that could be recovered.
  - 2) Allocable- A cost must be distributed in reasonable proportion to the benefits received by the grant being charged.
  - 3) Reasonable- A cost must reflect what a “prudent person” would pay under similar circumstances.
  - 4) Consistent- Treatment of costs within the accounting system should be consistent.
- C. Non-federally sponsored projects typically define allowable costs within the terms and conditions of the award notice. However, if specific guidance is not provided, then the cost principles provided in Section B (a-d) will apply.

2. **Responsibilities:**

- A. Department- Program Principal Investigator (PI) or other designated departmental personnel:
- 1) Verify that only allowable charges are posted as direct charges to the sponsored project fund.
  - 2) Signature or electronic approval by the PI or designated departmental personnel indicates:
    - a) Approval of the action requested.
    - b) Charges are directly related to the project scope.
    - c) Charges and activities are allowable according to the approved project budget and project requirements.
    - d) Charges have been incurred within the approved project period or documentation of sponsor approval for charges outside of the project period has been submitted to OSP.
    - e) Charges have been incurred in accordance with TTUHSC El Paso operating policies and are being treated consistently.
    - f) Charges on the sponsored project fund are reasonable as to their purpose and are recorded and allocated according to the benefits derived by the program.
    - g) Cost transfers and cost corrections are kept to a minimum to avoid audit concerns and are timely submitted to CGA to avoid reporting errors.
- B. CGA:
1. Secondary, general review of posted transactions to identify expenses that may be questionable. Per Paragraph 2A.1 above, it is the responsibility of the PI or other designated departmental personnel to ensure that only allowable expenses are charged to the project fund.
  2. Direct questions regarding the appropriateness of charges to the PI or other designated department personnel.
  3. Request sufficient documentation and justification of charges to maintain proper financial account management and records.
  4. Process cost transfers if any expenses are determined to fall outside of these guidelines. Such cost transfers should comply with HSCEP OP 50.18.