

Guidance for Direct Charging of Administrative and Clerical Salaries to Sponsored Programs

The following guidance is intended to assist Principal Investigators and departmental research and business administrators with compliance with 2 CFR 200.413(c) (Uniform Guidance). Per the Uniform Guidance:

The salaries of administrative and clerical personnel are normally treated as indirect costs. Direct charging of the salaries of administrative and clerical personnel to sponsored projects may be appropriate only if all of the following conditions are met:

- 1) Administrative or clerical services are integral 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.*

The University defines administrative and clerical personnel as those personnel who perform administrative and clerical services. Administrative and clerical services include, non-technical support services such as clerical support, financial management, procurement of materials and services, budget and planning, and personnel management.

Project criteria that *may* support the necessity/integrity of administrative and clerical services and direct charging of administrative and clerical personnel on a sponsored program include:

- Large, complex program such as a center or program project
- Entails assembling and managing teams of investigators from a number of institutions
- Involves extensive administrative support for data accumulation, analysis and entry, surveying, tabulation, cataloging, searching literature, and reporting (such as epidemiological studies, clinical trials, and retrospective clinical records studies)
- Requires making travel and meeting arrangements for large numbers of participants, such as conferences and seminars
- The principal focus is the preparation and production of manuals and large reports, books and monographs (excluding routine progress and technical reports)
- Is geographically inaccessible to standard departmental administrative services, such as research field sites that are remote from campus
- Requires extensive project-specific database management; extensive individualized graphics or manuscript preparation; extensive human or animal protocols
- Is a training grant

Defining “Integral”

The word “integral” is interpreted to mean that the administrative and clerical services are essential, vital, or fundamental to the achievement of the stated aims and objectives of the project or activity. As such, the level of support required should typically be greater than that provided for general administrative support on standard sponsored programs. Typically, an individual who

is performing administrative and/or clerical services which are integral to a sponsored program will have a committed effort of at least 15-25%.

Recognizing Administrative and Clerical Personnel

Job codes and position titles are often too vague to accurately reflect the tasks performed by an individual. In each instance, the actual job functions/duties of the individual should be reviewed. The following titles (and job codes) are examples of positions that usually have administrative and clerical duties and therefore are categorized as administrative or clerical for the purpose of these guidelines. This list is not exhaustive.

- Administrative Assistant (000834)
- Administrative Associate (000269)
- Clinical Trials Coordinator (000387)
- Financial Manager (001362)
- Financial Coordinator (001660)
- Financial Coordinator Sr (002214)
- Program Assistant (000894)
- Program Assistant Sr (000875)
- Program Coordinator (000698)
- Program Coordinator Sr (000699)
- Program Manager (000700)
- Research Coordinator (000498)
- Research Manager (000175)
- Secretary I (000879)
- Secretary II (000888)
- Technology Specialist (001323)
- Unit Business Manager (000426)
- Unit Business Manager Intermediate (000428)
- Unit Business Manager Senior (000108)

Recognizing Administrative and Clerical Services

Administrative and clerical services include, non-technical support services such as clerical support, financial management, procurement of materials and services, budget and planning, and personnel management. Examples of clerical and administrative duties may include the following (this list is not exhaustive):

1) Clerical support

- Provide general support services to project Principal Investigator
- Review incoming correspondence and respond to routine inquiries
- Routine bookkeeping, including personnel time and pay records, faculty records, student records, and financial records
- Maintain current information on policies and programs

- Maintain logs and gather data for various lists and reports maintained by the department
- Manage/Coordinate/Arrange travel: making all reservations and itineraries
- Manage/Coordinate/Arrange conferences, training programs and workshops: making all arrangements for agendas, speakers, food, and facilities
- Monitor set up of training rooms, providing training equipment and supplies
- Assist in scheduling and coordination of training and academic course events
- Assist with logistical arrangements such as meetings, equipment, parking, etc.
- Schedule rooms and support related meetings
- Support for printing, copying, and document imaging
- Production and printing of reports
- Monitor trainees parking coverage
- Liaison between University departments, including personnel, payroll, purchasing, and physical plant

2) Financial management

- Manage financial and reporting activities: budgeting, contract negotiation, invoicing, planning, implementation, and evaluation
- Prepare budgets and monitor expenditures
- Prepare and maintain financial records, academic, and other administrative reports
- Reconcile hotel and food service invoices and submit to sponsor timely
- Assist with special reconciliation problems
- Approve payments
- Create and maintain billing ledger documenting all invoices sent to administrative department for payment
- Prepare budgets and arrange payment for study patients
- Communicate with individuals regarding billing matters
- Maintain records and back-up financial information
- Maintain expenditures, financial records, budget preparations, and payment approval

3) Procurement of materials and services

- Order materials, supplies, and equipment
- Manage general purchasing
- Coordinate acquisition and provide asset management
- Partner with IT regarding support, standards, and policy, etc.

4) Budget and planning

- Develop and assist with research proposals
- Assist in budget preparation
- Interpret and advise faculty regarding extramural funding source guidelines and requirements
- Identify and manage all operational aspects of targeted grant proposals, program development, and evaluation

- Assist in the development and implementation of specific programs and proposals
- Develop administrative policies and procedures

5) Personnel management

- Manage project payroll
- Manage general Human Resources (HR) activities
- Process changes in employee or student records
- Coordinate and schedule work flow and personnel activities
- Coordinate training for faculty and staff on the use of desktop technology
- Act as office manager, coordinating the work of support staff
- Interview, hire, train, and direct clerical support staff
- Oversee personnel transactions of the unit
- Develop and oversee maintenance of all unit and personnel records
- Hire, develop, coach, train, supervise, and evaluate personnel and program staff

Requirements and Process for Charging the Salaries of Administrative and Clerical Personnel as Direct Costs to Sponsored Programs

Per Uniform Guidance 200.413(c), direct charging of the salaries of administrative and clerical personnel may be appropriate only if all of the following conditions are met:

- 1) Administrative or clerical services are integral 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.

In order to directly charge the salaries of administrative and clerical personnel to a sponsored program, these costs must be included and fully justified in the approved budget/budget justification or prior sponsor written approval is required.

If it is determined that administrative and clerical services are essential, vital, or fundamental to a project or activity, the salaries section of the proposal budget justification should (1) explicitly indicate how any administrative and clerical services are integral to the project with the proposed percentage of effort and (2) include the following statement in the personnel role description: Based upon this justification, the University of Louisville is requesting agency approval for support of this position as an administrative cost allowed under 2 CFR 200.413.

If a proposal is submitted with the required statement/justification outlined above, and the subsequent award issued by the sponsor does not explicitly disallow the administrative cost, the administrative and clerical costs will be considered approved.

If new or additional (over 25% of the amount previously approved) administrative or clerical services are needed during the life of an award, the Principal Investigator must submit a letter of

request to the Office of the EVPRI (Sponsored Programs Administration-Grants Division, Clinical Contracts Division, or Office of Industry Engagement) requesting approval to direct charge prospective (not retroactive) administrative and clerical salaries. The request should (1) outline the percent of effort required, the time period needed, and the estimated salary and fringe costs and (2) explain how the administrative and clerical services being requested are integral to the project. The Office of the EVPRI will coordinate this request with the sponsor. **Prior sponsor written approval is required before the expense can be charged as a direct costs to the sponsored program.**

History

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