

# Topics • History, Purpose, and Definition • Examples of NIH Support • Costing and Rate Setting Principles • Billing Considerations • Institutional Contribution • Non-Institutional Usage • Operating Surplus • Depreciation • Special Considerations

# History July 2009 meeting with National Center for Research Resources, NIH Office of Extramural Research, universities and other grantees Original NIH Draft & Request for Comments September 23, 2010 GENERATED MORE QUESTIONS THAN ANSWERS! Final April 2013 FAQ Notice is much improved http://grants.nih.gov/grants/guide/notice-files/NOT-OD-13-053.html

FAQ's Purpose	
For NIH staff and awardees	
<ul> <li>To ensure compliance with award T&amp;C's and federal cost principles</li> </ul>	
<ul> <li>Answers to common questions regarding</li> </ul>	
NIH–funded core facilities	

### (3)

### Purpose (cont.)

- NOT intended to establish new policies
- NOT intended to establish new interpretations of applicable Federal cost principles
- NOT broad guidance on ALL institutional service centers
- NOT intended to provide definitive or final interpretations to all circumstances



### Definition

- For purposes of these FAQ's Core facilities
  - Are centralized shared research resources
  - Provide access to instruments, technologies, services as well as expert consultation
  - Typically are a discrete unit
  - May have dedicated personnel, equipment and space
  - Generally recover costs through user fees charged to investigator's funds (often NIH / other Fed grants)

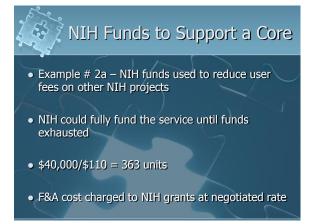
De De	finition (cont.)
<ul> <li>Cores may be s</li> <li>Institutional fur</li> <li>Federal funds</li> <li>External revenu</li> <li>Other funding of</li> </ul>	nds
should be obser • NIH grants are	unding, costing issues in FAQ's rved if: direct charged to use a core ant provides general support for a

How NIH Supports Cores	
• Example # 1 – NIH grant provides direct support	
<ul> <li>Example #2 – NIH grant (Center, Program Project Grant or Resource award) to reduce user fees on other NIH projects</li> </ul>	
<ul> <li>Example #3 – NIH grant uses a core and is charged a fee</li> </ul>	

NIH Funds to	Support a Core
• Example # 1 – NIH grant pr	ovides direct support
<ul><li> Total Allowable Direct Cost</li><li> NIH Direct Funding to Core</li><li> Net Recoverable Cost</li></ul>	\$110,000 \$ 60,000 \$ 50,000
Number of service units 1	1,000
Net cost/unit	50 (user fee)



NIH Funds to	Support a Co	re
Example # 2 – NIH funds on other NIH projects	used to reduce user fe	es
Allowable Cost \$110,000	NIH Support \$40,	000
Number of units 1,000		800
• Cost/unit (user fee) \$110	NIH offset per unit	\$50
Net Direct charged to NIH	grants: \$60 (\$110-50)	



# NIH Funds to Support a Core Example # 3 – Any type NIH grant uses Core and is direct charged all or portion of allowable direct cost of service Using previous costs and units NIH grants would pay full rate (\$110 per unit) or applicable portion

## General Core Costing Principles Costs of providing services must be Allowable Allocable Consistently applied Reasonable Unallowable costs Reference to A-21, section J47 & A-122, Att. B

Limitations on Recoverable Costs for NIH Grants	è
Core costs may be limited by:	
• Terms of the Award	
<ul> <li>Core's "infrastructure" costs (F&amp;A type expenses) recovered via application of institution's F&amp;A rate</li> </ul>	



## "If these costs were NOT included in the depreciation or O&M costs recovered by the application of the F&A rate, including them in the core facility would NOT represent an Unallowable duplication of cost recovery"



### Rate Setting Principles (cont.)

- Rates charged to internal institutional users must be consistent with other users
- Regardless of funding source(s)
- Consistent with the concept of "one service, one rate"

### **Billing Considerations**

- Billing Cycles must occur at regular intervals for timely/accurate recovery (e.g., monthly)
- Billing in advance of the work or receipt of Pre-payment is NOT Allowable
- Long term projects may bill before completion if term unreasonably delays cost recovery



### Institutional Fiscal Contributions to Cores / Applications to NIH

- Cores need not break even
- Institutions may provide funds to support Cores (e.g., pay salaries for core work)
- If formally committed, put into NIH budget application
  - Considered "voluntary committed cost sharing" for award
- Allowable for institutions to decide against such formal commitments (no VCCS)

Non-Institutional Usage
Third parties can be charged at rates different than others
"Net" fees should remain "reasonable"
Charges MAY include F&A plus "fee in excess of costs"
<ul> <li>Recoveries in excess of full cost MAY be Program Income</li> <li>if core costs are supported on any NIH grant and other pertinent conditions apply</li> </ul>
If NOT, then institutional and federal policy apply

### **Operating Surplus**

- Cores may NOT purposely accumulate profits from Internal (incl. NIH) users
- Acquisition cost of new equipment can **NOT** be funded with a core internal operating surplus
- Charges of one Core can **NOT** directly subsidize implementation/operation of another Core



### Depreciation in Core Rates

- Depreciation may be considered an Allowable cost
- Can NOT include depreciation for portion of equipment purchased by federal funds
- Only portion purchased via Non-federal sources
- For non-Federal items, institutions choose whether to allocate depreciation or not
- Can NOT treat capitalized purchases as "current expenses" in core rates



### **Special Considerations**

- One Service in a Core CAN recover the cost of another service in the core if controls prevent double billings
- Acceptable to initially estimate Core costs/rates but, must be adjusted to actuals later
- NO discounted fees for users who allow Core to use their federally funded equipment
- FAQ's are NOT generally applicable to Specialized Service Facilities

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### Special Considerations (cont.)

- "Differential Pricing" allowable for large quantity purchases, high-volume usage, off-peak usage, etc.
- Core may have multiple rates for same service when such rates are:
  - Properly established
  - Consistent with federal cost principles
  - Favorable rates are made available to ALL users
- Core fee schedule may NOT "cap" amounts



### QUESTIONS?

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