

106 Policy on Sponsored Programs Cost Sharing

PURPOSE

The purpose of this policy is to provide direction on how Colorado Mesa University Sponsored Programs will comply with the requirements of Title 2 Code of Federal Regulations 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, as well as individual federal agency policies and procedures. All committed cost sharing is subject to this policy regardless of whether the sponsor is a federal or non-federal entity.

Cost sharing is any project cost that is not reimbursed by the sponsor to support the scope of work defined by sponsored award. Cost sharing, also known as matching, is typically funded by Colorado Mesa University (CMU) and is strongly discouraged unless required by the sponsor. Voluntary cost sharing is not allowed unless a clear benefit for CMU can be documented. All committed cost sharing must be tracked and may require reporting, even in the event it is entered into voluntarily.

Cost sharing expenditures must adhere to the same accounting, financial, legal, and regulatory requirements as direct cost expenditures on sponsored awards and must comply with the following:

- Federal or non-federal sponsored award terms and conditions
- Federal regulations including restrictions for procurement and airfare
- CMU sponsored programs policies and guidelines
- Donor restrictions

DEFINITIONS

Mandatory Committed Cost Sharing: Costs required as a condition of the award which must be tracked and may require reporting. This type of cost sharing is required by the Sponsor and must be included in the proposal.

Voluntary Committed Cost Sharing: Cost sharing specifically pledged by CMU on a voluntary basis which is quantified in either the proposal budget and/or narrative and becomes a binding requirement of the award, must be tracked, and may require reporting. CMU will only enter into this type of relationship when the benefit to the institution is clear and beneficial.

Voluntary Uncommitted Cost Sharing: Costs and effort that are not included as part of the submitted proposal or upon acceptance of the award. This does not need to be tracked or reported.

In-Kind Cost Sharing: In-kind cost sharing are contributions wherein the value can be readily determined, verified, documented, and justified but where no actual cash is transacted in securing the good or service comprising the contribution. When applicable, an estimated value of the in-kind cost sharing should be determined and documented based on the fair market value at the time of the accepting award. In-kind cost sharing must be tracked manually by the department/local unit managing the award.

PROCEDURES

Uniform Guidance Section 200.306 requires that “cost sharing funds are; a) verifiable from the University's records b) not included as contributions for any other federal award c) necessary and reasonable for the accomplishment of the project or program objectives d) are allowable under Subpart E Cost Principles e) not paid from another federal award and f) included in the approved budget when required by the Federal awarding ”

Failure to appropriately document cost sharing commitments from verifiable official University records could result in audit findings and require the return of funds to the sponsor.

All Principal Investigators (PIs) and administrators at CMU within all departments, University-wide initiatives, and centers who are involved with the administration and conduct of sponsored awards must comply with this policy.

ROLES AND RESPONSIBILITIES

Principal Investigators/Departments:

Proposal stage

- Identifies the type of committed cost sharing and ensuring the cost share budget includes expenditures that are allowable, allocable, reasonable, and consistently accounted for in accordance with University and sponsor policies.
- Obtains department head and VPAA approval and signatures for cost sharing commitments.

Upon receipt of award and during the award period

- Upon request from Sponsored Programs, determines if there have been any changes in the proposed cost sharing commitment (e.g. increased or decreased amount); or when there is a change in the cost sharing source.
- Monitors the committed cost share as part of the quarterly or monthly invoicing process.
- Department assumes any financial loss if cost sharing commitments are not met and sponsor does not approve a reduction of cost sharing commitment.

Sponsored Programs

Proposal stage

- Reviewing proposals for cost sharing commitments and determining if the proposed cost sharing is allowable and in compliance with sponsor and University policies and ensuring the appropriate school- level approvals for cost sharing sources are obtained

Upon receipt of award and during the award period

- Determining whether there have been any changes to the proposed cost sharing commitments.
- Confirming with the department that committed cost sharing funds are available.
- Confirming that the cost share has been met and complies with University and sponsor policy or requesting a renegotiation of the cost sharing commitment from the sponsor if cost sharing obligation cannot be fulfilled (Note: If the sponsor is unwilling to renegotiate the cost sharing terms of the award, the University may be forced to decline the).

- Coordinating with the department to address and clarify potential cost sharing issues and, if necessary, resolve with administration officials.
- Reporting cost share commitment to sponsor, if required.