



UNIVERSITY OF MIAMI POLICY AND PROCEDURE MANUAL

TITLE:	Cost Sharing	REFERENCE:	Revised
CATEGORY:	Office of Research Administration	PAGE:	1 of 3
		SUPERSEDES:	New
APPROVER:	Barbara A. Cole Associate Vice President Office of Research Administration	VERSION:	New
		EFFECTIVE:	February 2, 2017

PURPOSE:

This policy is designed to ensure that cost sharing requirements of externally sponsored activities are accounted for and reported in a manner consistent with requirements set forth in 2 CFR 200, Federal and State regulations, as well as the award's terms and conditions and the sponsor's policy.

Failure to comply with the University of Miami's (UM's) policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded clinical trials.

SCOPE:

This policy applies to all UM personnel, namely:

- Faculty, including voluntary faculty.
- Faculty emeriti engaged as active researchers on UM research activities.
- Researchers, including research staff, postdoctoral fellows, and research associates.
- Graduate students, undergraduate students, and interns involved in research programs.
- Staff in departments, centers, institutes, and administrative offices charged with responsibilities under this policy.
- Consultants, agents, and volunteers associated with research and scholarly activities, as well as in departments and offices charged with responsibilities under this policy.

All UM personnel must be aware of the complex and detailed rules provided under Federal and non-Federal regulations as well as the terms and conditions of the individual sponsored activity. While compliance with all applicable requirements is essential, it is equally important to maintain an open research environment that welcomes the participation of researchers as part of UM's mission. To maintain this balance, UM personnel must be familiar with this policy in addition to the Federal and non-Federal regulations on sponsored activities.

It is the responsibility of all UM personnel to be aware of UM policies and exercise reasonableness in managing all sponsored activities appropriately.

The Office of Research Administration is responsible for providing information to sponsoring agencies that demonstrate the University has fulfilled the terms and conditions of receiving the award.

The Office of Research Administration is responsible for helping UM personnel understand and comply with this policy.

POLICY:

It is the policy of the University of Miami to record, monitor and report committed cost sharing and to ensure that costs claimed as cost sharing are appropriate, necessary, and allowable. Cost sharing represents that portion of specifically allocated total project costs not borne by the sponsor, and is typically in the form of an actual cash expenditure of funds.

When a Principal Investigator (PI) proposes cost sharing, and the University agrees, the University is required to provide the stated resources in the performance of the awarded project. Considering the administrative requirements and responsibilities inherent in the cost sharing commitment, the PI (or other person responsible for the identified fund) should carefully weigh the cost effectiveness versus the expected benefits of each potential cost sharing commitment. Voluntary cost sharing of direct expenditures represents a redirection of departmental or school resources from teaching or other departmental and school activities to support a sponsored award.

In the University's commitment to cost share, the PI must ensure the following:

- Voluntary cost sharing is permitted by the sponsor for the project proposed.
- Cost sharing funds are verifiable from UM and/or third party's records.
- Cost sharing funds are not included as contributions for other sponsored awards.
- Cost sharing funds are necessary and reasonable for the accomplishment of the project/program objectives.
- Cost sharing funds are allowable under the Federal and/or sponsor's guidelines and terms and conditions.
- Cost sharing funds are not paid for by another sponsored activity unless specifically authorized by the second sponsor.
- Cost sharing funds are provided for in the approved budget if required by the sponsor.
- Cost sharing conforms to all provisions of the Uniform Guidance and other Federal, State and other sponsor terms and conditions.

Unrecovered F&A (indirect) costs, including F&A associated with direct costs committed as cost sharing or matching, may be included as part of cost sharing or matching only with the prior approval of the sponsor.

Matching comprises all contributions, including cash and third party in-kind contributions that meet the criteria identified above for shared costs.

Voluntary committed cost sharing is discouraged at the University, and is not expected for Federal research proposals. It may be considered if it is both in accordance with Federal awarding agency regulations AND specified in a notice of funding opportunity. He/she understands that unless specified in both the Federal awarding agency regulations and in a notice of funding opportunity, voluntary cost sharing is not expected by Federal sponsors and

cannot be used as a factor during the merit review for proposals under the terms of the Uniform Guidance regulation 2 CFR 200.

All committed cost sharing must be tracked and accounted for separately. Tracking, reporting, and certifying of cost sharing are subject to audit. Proposals should clearly state the amount of effort and/or equivalent salary committed by the PI or other Key Personnel. An overdraft is not considered committed cost sharing and is not reported to a sponsor.

The cost sharing commitment must be approved by the PI, and the department chair or designee, and submitted to ORA at least 15 days in advance of the final application. ORA will then solicit required approvals:

- For Gables/RSMAS Proposals - Vice Provost for Research
- For Medical Proposals - Executive Dean for Research and Vice Provost for Research

DEFINITIONS:

Please refer to UM's Office of Research Administration (ORA) website for a list of acronyms and terms commonly used in sponsored/ research administration grants, contracts, and cooperative agreements: (<http://ora.miami.edu/assets/pdf/ora-policies/glossary.pdf>)

PROCEDURE:

UM personnel are to use [UM's ORA website](#) for guidance on matters pertaining to sponsored activities.

UM personnel are to follow the Standard Operating Procedures (SOP) outlined, as well as utilize the various required forms and templates that have been implemented for the activities related to this policy.

UM personnel should contact the Pre or Post Award staff for consultation if additional information is needed. Contact information can be found on [UM's ORA Contacts Webpage](#).