

Gallaudet University UNIVERSITY POLICIES

Title: Facilities and Administrative Costs Waiver Policy

Effective Date: May 3, 2021

Issuing Authority: Sponsored Programs (SP)

Responsible Office: Office of Research

Policy

It is the policy of Gallaudet University (GU, “the University”) that when submitting applications or proposals to acquire sponsor awards, Principal Investigators (PIs) apply the University's approved indirect cost rate to all externally sponsored research projects. However, requests for waivers or partial waivers of indirect costs occasionally are granted by the Provost or designee. With the exception of nonprofit charitable foundations that limit Facilities and Administrative (F&A) costs, indirect cost waivers are generally not granted by the University unless there is an exceptional reason to allow the waiver. Please be aware that IDC waivers are very rarely granted given the importance of indirect costs to Gallaudet’s overall operations. The following is a list of types of sponsors for which Waiver/Reduction requests are not eligible for consideration:

- Proposals to/projects with Federal sponsors (Direct or Prime Sponsor)
- Proposals to/projects with an office within the DC State Government
- Outgoing subawards which are the result of incoming transfers

Gallaudet grants waivers or reductions of Indirect Cost (IDC) for most individual non-profit agencies that have formal written public policies dictating an IDC rate different from the campus’ federally negotiated campus rates. These waivers are handled by Sponsored Programs without additional input from the principal investigator (PI).

Requests for waivers (partial or full) for student support programs or conference program where the funds will be used solely to support student or training will be automatically approved if:

- The School/Center director and Dean supports the request (please provide documentation such as an email to Sponsored Programs)
- The grant is not a supplement request and
- The funds available for the total project are capped at less than \$15K

Requests for waivers (partial or full) for outreach programs where the funds will be used to develop educational materials (such as ASL videos) will be automatically approved if:

- The School/Center director and Dean supports the request
- The request is for a pilot project and the subsequent, related project would carry full indirect costs or is a supplement to a grant award that carries full indirect costs
- The funds available for the total project are capped at less than \$50K

Purpose of this Policy

The purpose of this policy is to provide the requirements for a waiver of the University's full F&A cost rate for specific proposals and the related criteria necessary for potential waivers.

Scope of this Policy

This policy is applicable to all schools, centers, units, and personnel of the University involved in administering sponsored awards.

Case-by-Case Exceptions

The Chief Research Officer will consider other requests for indirect (F&A) cost waivers only in very limited circumstances. Requests for indirect cost waivers are initiated by the PI and must be reviewed by the School Director (or Center Director) and Dean (if applicable) and forwarded for review to the Chief Research Officer or designee. The decision whether to grant or deny an exception request is at the sole discretion of the Chief Research Officer or designee. In determining the institutional costs and benefits of waiver requests, the Chief Research Officer may take any or all of the following into consideration:

- The significance of the research to the principal investigator, school/center director, and dean, and the willingness of the responsible unit to cost-share its portion of the indirect cost recoveries.
- Total proposed budget, amount of the requested waiver, and the precedent that will be established for the university unit, type of research, and/or sponsor category.
- Availability of support from other sources.
- History and anticipated future support from the sponsor.
- Nature of the support (e.g., student stipend, interim support between other projects, support which complements other projects).
- Whether other universities involved in the proposed research have accepted lowered indirect cost recoveries.

In certain circumstances, the Chief Research Officer or designee may approve full or partial waivers of the indirect (F&A) cost normally incurred by sponsored projects. However, such waivers will not be considered for projects where the sponsor is:

- profit-making or foreign organizations, where the research involves any reservation of rights on the part of the sponsor with respect to intellectual property or where granting the waiver might appear to establish a precedent for future projects; or
- an office or agency of a foreign government, including organizations funded by that government. Indirect (F&A) cost waivers or reductions are not granted to remedy incorrect classifications of costs. PIs may request supplemental funding from sponsors, however such requests are rarely granted.

Pre-Approved Exceptions

The following are instances when a waiver is pre-approved and a request for IDC waiver is not necessary:

1. Payments to students between partnering institutions that allow a student or post-doctoral fellow from one university to work at another university will not be assessed IDC, providing the award instrument used is a Salary Reimbursement Agreement (SRA) and is not a sub-award agreement.
2. IDC reductions or waivers required by the sponsor as a condition of obtaining an award (mandatory cost sharing) will be approved without additional justification or exception. However, the cost-sharing commitment must be included in the proposal in order to be consideration by the Sponsor.
3. Reductions required by non-profit institutions with policies regarding the use of their funds for overhead expenses. In the case where the non-profit has an official written and publicly disclosed policy in this regard that is applied on a consistent basis to all applicants

Requests should include:

- Sponsored Programs proposal number
- Amount of the waiver and the reason for the request
- Significance of the proposed research and support
- Description of the support through cost share and the source for this cost share
- Consequences of accepting or denying the waiver
- Approval by the School Director, Dean, and Chief Research Officer or designee; and
- Draft commitment letter prepared for Chief Research Officer signature if required by the sponsor

The chart below outlines the steps, the responsible office or person, and the time it generally takes to complete the **Indirect Cost Waiver**.

Steps	Responsible Office or Person	Timing
Submit a written request for Indirect Cost Waiver/Reduction with supporting documents to School/Center Director. If the School/Center approve the reduction or waiver, forward to the Dean for review prior to routing to the Chief Research Officer or designee for review.	Principal Investigator (PI)	15 days before submission to agency
If approved, include the documentation and the waiver amount approved in the transmittal when routing for approvals.	Principal Investigator (PI) and SP Research Administrator	5-7 days before submission to agency
Route transmittal for approvals	SP Research Administrator	5-7 days before submission to agency
Submit Proposal to sponsoring agency with the approved IDC	SP Research Administrator	3 days before submission deadline