

**Gallaudet University  
Academic Affairs  
Office of the Provost**

**Title:** Indirect Costs (IDC) Waiver Policy

**Effective Date:** August 20, 2021

**Issuing Authority:** Office of the Provost

**Responsible Officer:** Special Assistant to the Provost for Research

**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.

**Policy**

It is the policy of Academic Affairs (“AA”) that when submitting applications or proposals to acquire sponsor awards, Principal Investigators (PIs) apply the University’s approved indirect costs rate (IDC) also known as facilities and administrative costs (F&A) to all externally sponsored research projects. However, requests for waivers or partial waivers of indirect costs occasionally are granted by the Special Assistant to the Provost or designee. IDC waivers are generally not granted by the AA 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 Government
- Outgoing subawards which are the result of incoming transfers

Gallaudet grants waivers or reductions of Indirect Cost (IDC) for 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 OSPRS 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 students or training will be automatically approved if:

- The School director and Dean supports the request (please provide documentation such as an email to OSPRS)
- 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 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

*\*"Dean" refers to the "Dean of the Faculty" in most cases. If the request is being made by the director of a research center, the request should be routed to the responsible administrator (Special Assistant to the Provost for Research).*

## Scope of this Policy

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

## Case-by-Case Exceptions

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

- The significance of the research to the principal investigator, school 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 Special Assistant to the Provost 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 by an IDC, providing the award is not a subaward agreement.
2. IDC rates required by the sponsor as a condition of obtaining an award will be approved without additional justification or exception.
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

Indirect (F&A) cost waiver request form can be found in the library template of AdobeSign. Requests should include:

- OSPRS proposal number
- Amount of the waiver and the reason for the request
- Significance of the proposed research and support
- Consequences of accepting or denying the waiver

- Approval by the School Director, Dean, and Special Assistant to the Provost or designee; and
- Draft commitment letter prepared for Special Assistant to the Provost 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**.

<b>Steps</b>	<b>Responsible Office or Person</b>	<b>Timing</b>
Submit a written request for Indirect Cost Waiver/Reduction with supporting documents to the School Director. If the School approves the reduction or waiver, forward to the Dean for review prior to routing to the Special Assistant to the Provost or designee for review.	Principal Investigator (PI)	15 days before submission to agency. Intent to submit form must be completed first.
If approved, include the documentation and the waiver amount approved in the transmittal when routing for approvals.	Principal Investigator (PI) and OSPRS Research Administrator	5-7 days before submission to agency
Route transmittal for approvals	OSPRS Research Administrator	5-7 days before submission to agency
Submit Proposal to sponsoring agency with the approved IDC	OSPRS Research Administrator	0-3 days before submission deadline