To: All SPHHS Faculty and Staff

From: Kimberly Horn, Associate Dean of Research

Date: September 10, 2013

Re: Updated SPHHS F & A Transitioning Plan for Building Relocations

GW’s F & A rates vary by project type and performance site. This underlying assumption does not change upon any SPHHS relocations.

Scenario A: Generally, if the preponderance of project activity and/or personnel effort occur only at GWU-owned facilities, such as our new building, then the federally negotiated on-campus rate is applied (58.5%, current as of 2013). If the preponderance of project activity occurs only at non-GWU facilities (including projects for which lease payments are direct charged such as our 2175 K St offices), then the off-campus rate is applied (26.0%, current as of 2013).

Scenario B: If a project’s activities occur both at GWU and non-GWU facilities (i.e., on- and off-campus), which is not uncommon for SPHHS research projects, then a determination is made based on where the preponderance of personnel costs and effort occur. For instance, if 50% or more of the project’s activity (effort) is conducted at non-GWU facilities then the off-campus rate will apply. Otherwise, the on-campus rate will apply to the entire project. These rules apply with few exceptions for federal funding, including projects with federal flow-through funds (i.e., sub-awards) that also must adhere to the directives of any federal sponsor.

Scenario C: There are exceptions to the above scenarios. Typically, these exceptions apply only when there are no federal funds involved (e.g., Robert Wood Johnson or other private non profit organizations). If there are published guidelines that specify a sponsor’s F & A requirements, if other than GW’s federally negotiated rates, GW will honor those rates. If the sponsor does not have a written published policy on F & A requirements the rates will have to be otherwise negotiated by OVPR. Requests for waivers of F & A will be examined on a case-by-case basis. Such waivers will necessitate cost-share agreements which must be approved by the Associate Dean of Research in advance of the proposal submission.

F & A Determinations on SPHHS New Proposals and Current awards as of September 15, 2013: Determinations on the F & A rates for new proposals applying scenarios A-C are effective immediately (as of this revised guidance, September 15, 2013) for all SPHHS proposals with a start date on or after our targeted move-in date (April 1, 2014).
Updated SPHHS F & A Transitioning Plan for Building Relocations:

For new proposals with a projected start date between September 15, 2013 and April 1, 2014, spanning less than or equal to 1 year, our current operating practice for F & A applies and the use of on-campus rates are unlikely. Shorter term projects crossing over this window will be assessed on a case-by-case basis.

For new proposals with a projected start date between September 15, 2013 and April 1, 2014, spanning greater than 1 year, F & A determinations should be made using scenarios A-C. When considering scenarios A-C, as of this writing, the SPHHS operating assumption is that faculty and the majority of PIs will be located on-campus. With that assumption, for all federal proposals and other sponsors as allowed, the on-campus rate is 58.5% should be applied. See note below about potential negotiations if awarded.

We acknowledge that many non-federal sponsors do not permit full on- or off-campus F & A rates, but will sometimes allow other administrative costs on budgets. Because of the significant variation in allowable administrative costs across non-federal sponsors, all non-federal proposals that do not support full F & A will be independently reviewed by the Associate Dean of Research and OVPR to determine how to maximize the allowable alternative administrative costs of the sponsor (e.g., rent, equipment, FTE-related costs, administrative staff, etc.). Effective immediately and continuing until further notification, SPHHS will likely assign rent to ALL non-federal proposals, inclusive of all associated faculty and staff, where permissible. This process will be reexamined once our relocation process is completed. In order for an independent review not to delay proposal routing, it is important for PIs to discuss these scenarios with their Department Chairs and administrators as soon as they believe the proposal may need independent review. By way of an email to the Associate Dean of Research, and copied to the Chair, the PI confirms department-level approval to proceed with an independent review; Chairs or PIs may make recommendations for alternative allowable expenses in the email. The email from the PI should occur at the earliest possible time and before the 5-day routing window. See note below about potential negotiations if awarded.

Note: Despite our best planning, a fundamental assumption is that budgets of submitted proposals will be modified upon award given the tenuous nature of construction and relocation. Upon award notification, we fully expect OVPR in coordination with the PI to review and negotiate a final budget to reflect changes due uncontrollable non-programmatic circumstances for the SPHHS or GW (e.g., relocation, rent, utilities, benefits, etc.), or other funder mandated changes.

Currently funded projects of PIs moving into the new building during the life of the project will be assessed for potential re-budgeting of F & A, depending on the length of time remaining in the award upon the School’s completed move into the new building. The Associate Dean of Research will work with OVPR and PIs on these projects. Importantly, PIs should not contact sponsors directly about renegotiating F & A or re-budgeting awards.