

ADMINISTRATIVE POLICY**Cost Sharing on Sponsored Awards Policy****Effective as of**
April 2020

Approval Authority:	Vice Chancellor of Administration
Responsible Administrator:	Director, Office of Contract and Grant Accounting
Responsible Office:	Office of Contract and Grant Accounting
Policy Contact:	Office of Contract and Grant Accounting

POLICY STATEMENT

This Cost Sharing on Sponsored Award Policy has been developed to ensure that cost sharing on sponsored projects is proposed, accounted for and reported in a manner consistent with the requirements set forth in federal regulations (Office of Management and Budget (OMB) Uniform Guidance), requirements of sponsoring agencies and the policies of Vanderbilt University.

Vanderbilt expects that the resources with which it is entrusted are managed in a timely and responsible fashion, and in accordance with the applicable federal and non-federal regulations for sponsored contract and grant awards.

REASON FOR POLICY

The intent of this policy is to provide guidance to the research community on what constitutes cost sharing and to ensure good stewardship of Vanderbilt's externally sponsored awards when cost sharing exists as well as ensuring and enhancing compliance with the Uniform Guidance and sponsor guidelines.

POLICY SCOPE

All externally sponsored grants, contracts, cooperative agreements, traineeships, etc. are subject to this cost sharing policy. Subcontracts from other entities (universities, local government units, states, etc.) which are funded by federal agencies are subject to the same regulations as federally-sponsored awards made directly to Vanderbilt. Drug studies and fixed price contracts may have greater flexibility. You may contact the Office of Contract and Grant Accounting if you have any questions related to cost sharing on a sponsored award.

This policy should be understood by all University employees responsible for managing and overseeing externally sponsored awards, including Principal Investigators (PIs), Grant Managers, Departmental Managers and appropriate Dean's office personnel.

POLICY

All cost sharing on externally sponsored awards should be identified and associated with the award. The obligation for cost sharing is predominately associated with Federal grants and cooperative agreements. In accordance with OMB Uniform Guidance, cost-sharing costs must be reasonable, allowable, allocable and meet the consistency requirements under federal cost principles.

In addition, cost sharing costs should be certified in the effort reporting system (if mandatory or voluntary committed cost share) and cost sharing costs must be necessary and directly related to the project objectives. Cost sharing expense may not include costs already being charged to another award nor can they be paid for from a federal project unless authorized by the Federal agency. See the **Procedures** document for more detailed descriptions and requirements.

DEFINITIONS

Cost Sharing - For the purposes of this policy, cost sharing represents that portion of the total award costs of a sponsored agreement borne by the University, rather than by the sponsor.

PROCEDURES

Procedures to request and process the closeout of an externally sponsored award are outlined <https://www.vanderbilt.edu/ocga/docs/vupolicies>

FREQUENTLY ASKED QUESTIONS

FAQs related to this policy are outlined <https://www.vanderbilt.edu/ocga/docs/vupolicies>.

ADDITIONAL CONTACTS

Subject	Contact/Position	Phone	Fax/Email
Policy Issuance	Director, OCGA	615-343-6655	ocga-postaward@vanderbilt.edu
Policy Questions	OCGA	615-343-6655	ocga-postaward@vanderbilt.edu

RELATED POLICIES/DOCUMENTS

Federal Uniform Guidance – <https://www.ecfr.gov>

NIH Grants Policy Statement – <https://grants.nih.gov/policy/index.htm>

NSF Requirements – <https://www.nsf.gov/bfa/dias/policy/>

Cost Transfers for Federally-Sponsored Awards Policy - <https://www.vanderbilt.edu/ocga/docs/vupolicies>

HISTORY

Issued: 01/01/2002

Latest Update: 04/01/2020

***Disclaimer:** The policies and procedures that guide practices are intended to assist in consistent administration and compliance. Vanderbilt reserves the right to modify its policies and practices, in whole or in part, at any time. Revisions to existing policies and procedures, and the development of new policies and procedures, will be made from time to time at the discretion of the University. When new policies are implemented or existing policies are revised, the University will notify members of the University community as soon as practicable. However, where differences occur, the most recent policy as reviewed and approved by the University will take precedence.*