Determining the Allowability of Costs on Federally-Sponsored Agreements: *Allocable, Consistent, Reasonable & Collectible*

Is the proposed expense **readily, accurately & specifically** identifiable with a particular project?

- **Yes**
  - Direct Cost
    - Is the expense **allocable** to a specific sponsored project? **Yes**
      - Is treatment of the expense **consistent** with University practice & policy? **No**
        - Expense is **unallowable**, charge to appropriate non-federal chartfield
      - Is the expense **reasonable**? **No**
        - Expense is **unallowable**, charge to non-federal cost share budget
    - Is the expense **collectible** under the terms of the sponsored agreement? **No**
      - Is cost sharing part of the project budget? **Yes**
        - Charge is **allowable**, charge directly to federal sponsored project
      - **No**
  - **Indirect Cost**
    - Is the expense being incurred project **specific**? **Yes**
      - Are **unlike** circumstances justified in the proposal & approved by the sponsor? **No**
        - Expense is **unallowable**, charge to appropriate non-federal chartfield
    - Is the expense being incurred as a result of **unlike, exceptional** circumstances? **No**
      - Are **unlike** circumstances documented by PI in department grant file? **Yes**
        - Charge is **allowable**, charge directly to federal sponsored project
      - **No**
    - **No**

*This document is part of "ORSP 104: OMB Cost Principles - The Allowability of Costs" workshop and is for training purposes only. For answers to specific questions or concerns related to the allowability of costs on federally-sponsored projects, please consult OMB Circular A-21 (Subsection J), UMS APVIII-C: Sponsored Programs – Direct Charging Of Expenses, ORSP Quick Reference Guide: A "short list" of Allowable and Unallowable Costs for Federally Sponsored Projects, and/or contact ORSP directly.*
Sec. C2. Factors affecting allowability of costs. The tests of allowability of costs under these principles are: (a) they must be reasonable; (b) they must be allocable to sponsored agreements under the principles and methods provided herein; (c) they must be given consistent treatment through application of those generally accepted accounting principles appropriate to the circumstances; and (d) they must conform to any limitations or exclusions set forth in these principles or in the sponsored agreement as to types or amounts of cost items.

Sec. C3. Reasonable costs. A cost may be considered reasonable if the nature of the goods or services acquired or applied, and the amount involved therefore reflect the action that a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made. Major considerations involved in the determination of the reasonableness of a cost are: (a) whether or not the cost is of a type generally recognized as necessary for the operation of the institution or the performance of the sponsored agreement; (b) the restraints or requirements imposed by such factors as arm’s-length bargaining, Federal and State laws and regulations, and sponsored agreement terms and conditions; (c) whether or not the individuals concerned acted with due prudence in the circumstances, considering their responsibilities to the institution, its employees, its students, the Federal Government, and the public at large; and, (d) the extent to which the actions taken with respect to the incurrence of the cost are consistent with established institutional policies and practices applicable to the work of the institution generally, including sponsored agreements.

Sec. C4. Allocable costs. a. A cost is allocable to a particular cost objective (i.e., a specific function, project, sponsored agreement, department, or the like) if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received or other equitable relationship. Subject to the foregoing, a cost is allocable to a sponsored agreement if (1) it is incurred solely to advance the work under the sponsored agreement; (2) it benefits both the sponsored agreement and other work of the institution, in proportions that can be approximated through use of reasonable methods, or (3) it is necessary to the overall operation of the institution and, in light of the principles provided in this Circular, is deemed to be assignable in part to sponsored projects. Where the purchase of equipment or other capital items is specifically authorized under a sponsored agreement, the amounts thus authorized for such purchases are assignable to the sponsored agreement regardless of the use that may subsequently be made of the equipment or other capital items involved.

Sec. C11. Consistency in allocating costs incurred for the same purpose. a. All costs incurred for the same purpose, in like circumstances, are either direct costs only or F&A costs only with respect to final cost objectives. No final cost objective shall have allocated to it as a cost any cost, if other costs incurred for the same purpose, in like circumstances, have been included as a direct cost of that or any other final cost objective. Further, no final cost objective shall have allocated to it as a direct cost any cost, if other costs incurred for the same purpose, in like circumstances, have been included in any

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1 Relocated to 2 CFR Part 220.
2 Direct costs are those costs that can be identified specifically with a particular sponsored project, an instructional activity, or any other institutional activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.
3 F&A costs are those that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity.