

UNIVERSITY OF THE VIRGIN ISLANDS



POLICIES AND PROCEDURES MANUAL

HIGHER EDUCATION ACT OF 1965 TITLE III, PART B STRENGTHENING HISTORICALLY BLACK COLLEGES AND UNIVERSITIES

*Prepared by
Title III Program Office
January, 2005
Revised November, 2020*

TABLE OF CONTENTS

TABLE OF CONTENTS.....	ii
FORWARD.....	1
RESPONSIBILITIES	1
DEFINITIONS.....	2
PROGRAM FOCUS AREAS.....	2
APPLICABLE REGULATIONS	3
APPLICABLE POLICIES.....	3
APPLICATION PROCEDURES	4
POST-AWARD PROCEDURES AND POLICIES	5
PERSONNEL POLICIES AND REQUIREMENTS	5
REPORTING REQUIREMENTS	6
PROCUREMENT PROCEDURES AND POLICIES.....	7
TRAVEL.....	8
CONSULTANTS.....	9
PROGRAM INCOME	10
ALLOWABLE AND UNALLOWABLE ACTIVITIES	10
ALLOWABILITY AND ALLOCABILITY OF COSTS	12
FOOD AND MEETING EXPENSES	13
EQUIPMENT	14
PUBLICATIONS.....	16
MONITORING.....	16
CLOSEOUT PROCEDURES.....	16
ATTACHMENT A—INDIVIDUAL NARRATIVE FORM.....	A
ATTACHMENT B—IMPLEMENTATION STRATEGY AND TIMETABLE FORM..	B
ATTACHMENT C—INDIVIDUAL ACTIVITY BUDGET	C
ATTACHMENT D—MEASURABLE OBJECTIVES AND PERFORMANCE INDICATORS*	D
ATTACHMENT E—TIME AND EFFORT REPORT	E
ATTACHMENT F—PROFESSIONAL SERVICES AGREEMENT FORM	F
ATTACHMENT G—TITLE III MODEL CONTRACT	H
ATTACHMENT H—TITLE III TRAVEL REPORT FORM.....	M
ATTACHMENT I—TITLE III QUARTERLY REPORT FORM.....	N
ATTACHMENT J—ALLOWABILITY OF SPECIFIC ITEMS OF COST	Q

FORWARD

The purpose of this document is to provide guidance to designated Activity Directors for those projects funded by the U.S. Department of Education Title III programs. These funds are provided to the University of the Virgin Islands by the U.S. Department of Education through the *Strengthening Historically Black Colleges and Universities Program* (Title III, Part B and Part F). Since 1968, the University of the Virgin Islands has utilized Title III funds to provide student services, improve its technology and telecommunications capability, develop members of faculty, and support academic programs.

The U.S. Department of Education established the *Strengthening Historically Black Colleges and Universities Program* to offer financial assistance to “establish or strengthen the physical plants, financial management, academic resources, and endowments of historically black colleges and universities (HBCUs).” Part B is a discretionary grant program, while Part F (also known as the Fostering Undergraduate Talent by Unlocking Resources for Education (FUTURE) Act grant program) is a mandatory program. Both are meant to strengthen HBCUs so they may continue their unique role of educating black, educationally disadvantaged, and low-income students. It is also intended to facilitate a decrease in reliance on government financial support and to encourage reliance on endowments and other private sources of funding.

Financial assistance is made available in five-year cycles, with eligible projects from qualified institutions being approved annually by the U.S. Department of Education. A listing of eligible institutions is published in the Federal Register.

RESPONSIBILITIES

At the University of the Virgin Islands, the President is the Principal Investigator for the Title III program. Within federal and Title III program guidelines, the President determines which projects will be supported with the UVI Title III authorization, designates Activity Directors, and plays a primary decision-making role with regard to Title III funds.

Individual Activity Directors, assigned by the President to lead each funded project, are responsible for the programmatic goals and objectives of their project, for reporting as required to the UVI Title III Office, and for budget management within UVI, federal, and Title III program guidelines.

The Title III Office, reporting to the Vice Provost for Research and Public Service, is responsible for ensuring compliance with applicable UVI, federal, and Title III program guidelines, for overall program coordination and administration, for communication with the federal program officer, and for reporting on the progress of all projects.

This manual is intended to assist Activity Directors by providing a description of the policies and procedures applicable to the management of Title III-funded projects. It also presents a practical source of information for UVI personnel seeking to apply for Title III funding.

DEFINITIONS

- (1) **Activity Director**—the person responsible for coordinating all activities and preparing progress and other applicable reports for any project funded in whole or in part by federal funds under the Title III program.
- (2) **CFR**—the Code of Federal Regulations.
- (3) **Equipment**—tangible nonexpendable personal property charged directly to the Title III grant having a useful life of more than one year and an acquisition cost of \$5,000 or more.
- (4) **Human Resources Policy Manual**—the manual prepared by the University of the Virgin Islands' Human Resources Department and available online at http://www.uvi.edu/files/documents/Administration_and_Finance/Human_Resources/HR_Policy_Manual/Final_v4.1%2011-27-12%20approved.pdf.
- (5) **Project Director/Title III Director**—the person responsible for programmatic performance for all projects funded in whole or in part through the federal funds awarded to the University of the Virgin Islands under the Title III program.
- (6) **Secretary**—the Secretary of the US Department of Education or his/her designee.
- (7) **Title III Office (Project Administration)**—the unit within the Research and Public Service Component of the University of the Virgin Islands, the responsibility of which is to manage federal funds awarded to the University of the Virgin Islands under the Title III program.
- (8) **UVI Financial Policy Manual**—the manual prepared under the direction of the Vice President of Administration and Finance and approved by the UVI Board of Trustees on June 9, 2012, and any amendments thereto. This document is available online at http://www.uvi.edu/files/documents/Administration_and_Finance/June_2012_07a.pdf

PROGRAM FOCUS AREAS

The University of the Virgin Islands has identified six focus areas as the institution's priorities as a part of its 2018-23 strategic plan, entitled *Greatness Through Innovation*. These include: Innovation and Distinction; Leadership and Excellence in Academics, Research, and Public Service; Student Access, Recruitment and Success; Measurement, Analysis, Knowledge Management, and Results; Operational Efficiencies and Focus; and Valuing People, Relationships and Culture. The Title III Comprehensive Development Plan translates these six areas of institutional attention to the four focus areas covered by the Title III grant program.

- (1) Academic Quality—Excellence in innovative teaching strategies and investment in program development for UVI’s most distinctive academic program areas are the hallmarks of the Academic Quality Focus Area.
- (2) Student Services—The core value of “Students’ well-being first” will engage programs that promote success and achievement, through the development of innovative strategies that support individuals as they pursue their academic and career goals.
- (3) Institutional Management—Institutional initiatives will incorporate creative and innovative approaches while ensuring that processes are aligned, protocols are well-documented, and accurate data supports decision-making.
- (4) Fiscal Stability—In line with the management value of fiscal responsibility, targeted fundraising and grant proposals are pursued as strategies critical to ensuring that adequate resources are available for supporting the goals of the strategic plan.

APPLICABLE REGULATIONS

The following regulations apply to those projects funded in whole or in part by the Title III program:

- (1) The following administrative regulations are applicable:
 - (a) 2 CFR Part 200, Uniform Guidance – Uniform Administrative Requirements, Cost Principles, and Audit Requirements; and
 - (b) the Education Department General Administrative Regulations (EDGAR), 34 CFR Parts 75-79 and 81-99.
- (2) Applicable program regulations are the Code of Federal Regulations (CFR) 34 CFR Part **608** (Strengthening Historically Black Colleges and Universities Program).

APPLICABLE POLICIES

- (1) All UVI employee policies articulated in the Human Resources Policy Manual are applicable to each employee whose salary is paid in whole or in part by federal funds under the Title III program.
- (2) The purchase of goods and services is governed by the UVI Financial Policy Manual, approved by the Board of Trustees of the University of the Virgin Islands on June 9, 2012.
- (3) The governing policy regarding conflicts of interest and time is the policy adopted by the Board of Trustees of the University of the Virgin Islands on June 19, 2004.
- (4) Copyright and patent rights are governed by the intellectual property policy approved by the Board of Trustees of the University of the Virgin Islands on October 16, 2004.

APPLICATION PROCEDURES

The President of the University of the Virgin Islands serves as the Principal Investigator on the UVI Title III program. The President establishes a programmatic theme, based on the University's Strategic Plan. The President may engage either of two processes in identifying projects for the five-year grant cycle. In the less formal process, the President, in conjunction with members of Cabinet and/or the Provost selects those projects that will receive support. Activity Directors are identified, and those persons are responsible for developing the project scope and implementing the projects when grant funding has been received.

With the more formal process, before the commencement of each five-year cycle, faculty and staff are invited to submit project pre-proposals consistent with the theme and the overall goals of the Title III program. The invitation to submit will describe the program theme and the deadline by which pre-proposals must be submitted to the Office of the President.

Members of faculty and staff are required to conform to the internal review requirements of their respective departments/units. Proposals submitted to the President will not be considered if they have not been approved by the Dean of the School or College, Vice Provost for Research and Public Service or Component Head, and the Title III Project Administration Office.

The UVI President, based on his/her review of the consistency of the submittals with the selected theme, determines which projects will be incorporated into the institution's application to the U.S. Department of Education. The Title III Office will notify the Activity Directors for each of the selected projects, invite them to prepare full proposals for consideration by the U.S. Department of Education, and provide them with instructions for doing so and with technical assistance. Project proposals may not be accepted for consideration if received by the Title III Office after the established deadline.

Model proposals, depicting the proposal format(s) that should be utilized, and all necessary forms are available from the Title III Director. The project proposals must contain the following:

- a Title Page,
- an introduction to the proposal,
- a project or program description,
- a description of the project objectives (described in a manner that may be measured) and performance indicators (see Attachment D),
- an Individual Narrative form (Attachment A),
- an Implementation Strategy and Timetable Form (Attachment B),
- a quantitative description of the baseline conditions to be improved or addressed by the project,
- a listing of the specific tasks to be completed,

- a detailed Individual Activity Budget (Attachment C);
- a listing of equipment to be purchased with grant funding;
- a listing of positions with salaries that will be supported in whole or in part by grant funding; and
- CV of the Activity Director.

Draft proposals may be submitted to the Title III Project Administration Office, not later than ten (10) working days prior to the federal deadline to enable review, revision, and preparation of the full UVI proposal for submittal to the Department of Education.

POST-AWARD PROCEDURES AND POLICIES

Upon receipt of the notice of award from the U.S. Department of Education, the Title III Office requests from each Activity Director, a listing of all personnel whose salaries are to be paid in whole or in part by Title III program funds. The Title III Director also requests from the Accounting Department that restricted accounts be established for each of the approved Title III projects. With the commencement of the fiscal year, the Title III Office notifies all Activity Directors of the status of their projects and project accounts and provides information regarding approved budgets. The Title III Director issues a Notice to Proceed, as soon as all accounts have been established at the Accounting Department.

At the beginning of the fiscal year (which runs concurrently with the grant year), the Title III Office will provide Activity Directors with an orientation regarding Title III project management requirements. The Title III Director will provide Activity Directors with all needed report forms and will arrange for training with appropriate financial and project management software to ensure that all Activity Directors and designated staff are capable of tracking progress and expenditures from their budgets and are able to compile all needed information for timely submittal of reports.

PERSONNEL POLICIES AND REQUIREMENTS

Title III Activity Directors are required to identify each salaried, hourly or student employee position, the salary of which is paid in whole or in part by federal funds under the Title III program, and, in addition to all other required approvals, submit personnel requisitions to the Title III Office for approval. Each employee, whose salary is paid in whole or in part by federal funds under the Title III program, is subject to the human resources policies articulated in the Human Resources Policy Manual, available online at http://www.uvi.edu/files/documents/Administration_and_Finance/Human_Resources/HR_Policy_Manual/Final_v4.1%2011-27-12%20approved.pdf.

Each employee, whose salary is paid in whole or in part by federal funds under the Title III program, is also required to submit a completed Time & Effort Report to the Title III Office each quarter, certified by the supervisor of the employee and/or the Activity

Director. Time and Effort Report forms shall be submitted by the fifteenth (15th) calendar day after the end of each quarter and should correspond with the level of effort actually expended during the reporting period. In no event will charges to Title III, irrespective of the basis of computation, exceed the proportionate share of the base salary for that period.

Funds provided to the University through the Title III program may not support any service, program, or position that was supported by University resources prior to receipt of the Title III award. Consequently, personnel paid by University funds cannot be moved to Title III funding for performance of the same duties and responsibilities that were University funded.

REPORTING REQUIREMENTS

At the commencement of each fiscal year, the Title III Office will distribute to all Activity Directors, a reporting schedule, indicating the deadlines by which all reports must be submitted. Each Activity Director will be responsible for ensuring that all reports are submitted to the Title III Office on or before the established deadlines.

Required reports include, but are not necessarily limited to:

- Quarterly Progress Report—(submitted to the Title III Office within 15 calendar days after the end of each reporting period) explaining the steps that have been taken during the reporting period to advance the project objectives, successes in achieving stated objectives and challenges that delayed or prevented the realization of stated objectives (including a description, by objective, of the proportion of objective that has been accomplished). While a copy of this report's base template is available in Attachment I, the actual report template is customized for each activity, based on the Legislatively Allowable Activity and program Focus Area within which the project is situated, and is provided to the Activity Director by the Title III Director;
- Time and Effort Report—(submitted to the Title III Office within 15 calendar days after the end of each quarter) a delineation of the time (as a percentage of total effort) that each employee who is funded in whole or in part by Title III funds has spent toward each project during the reporting period. The time and effort report should describe the work accomplished by the employee during the reporting period, as it relates to the project objectives, and should estimate the percentage of time allocated to each program or project. Each person with multiple assignments requires an accounting of all (100%) of employment time. If a person's salary is divided among the federal grant and other responsibilities (such as teaching or administration), there must be a clear accounting of all of the person's time. A copy of this report is available in Attachment E.

The Title III Office will convene a quarterly meeting of the President and Title III Activity Directors, at which each Activity Director will be expected to provide an oral report regarding progress on his/her project, and the extent to which expenditures are consistent with the project budget and spending plan. These meetings will afford the President, as Principal Investigator, the opportunity to identify any challenges that may

impede the realization of project objectives, and provide the opportunity for all Activity Directors to receive ongoing feedback on their projects. As such, they are considered mandatory, and each project should be represented by its Activity Director or her/his designated representative.

PROCUREMENT PROCEDURES AND POLICIES

The purchase of goods and services is governed by the policies established by the University of the Virgin Islands Purchasing Department and outlined in the UVI Financial Policy Manual (available online at https://www.uvi.edu/files/documents/Administration_and_Finance/June_2012_07a.pdf) and by the Procurement Standards articulated in 2 CFR 200 (available at https://www.ecfr.gov/cgi-bin/text-idx?SID=4e4f85de6aac59cf2639bfc5d66fa350&mc=true&node=sg2.1.200_1316.sg3&rgn=div7). Procurement that is pursued in a manner that is inconsistent with these policies will be disallowed by the Title III Office. In any case(s) where there is a conflict between the requirements of the UVI Financial Policy Manual and the requirements of 2 CFR 200, the requirements of 2 CFR 200 are considered applicable, except where the UVI Financial Policy Manual is more restrictive.

All Professional Service Agreements, Travel Authorizations, Interdepartmental Service Requisitions, Purchase Requisitions, Check Requisitions or other expenditure forms are initiated by the activity making the request and must be supported by appropriate documentation (i.e. invoice or quote). All requisitions for equipment shall include: a full description of the items being purchased; the intended purpose of the equipment, and the location where the equipment will be housed. The Activity Director is required to provide his/her signature on the respective document.

Requests for purchase are then routed to the Title III Office for review by the Title III Director, who must approve the purchase of all goods and services utilizing funds made available through the Title III program. If no changes are needed, requests are then forwarded to the Accounting Department or, in the case of Requests for Travel Authorization, to the office of the Provost or Vice Provost, as appropriate. If changes are needed and cannot be applied by the Title III Office, the document is returned to the originator for correction.

The Title III Director and Activity Directors shall not contract with or provide sub-awards to parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. Activity Directors may search the System for Award Management web site at <https://www.sam.gov/SAM/pages/public/searchRecords/search.jsf> to determine whether a vendor has been deemed ineligible for participation in Federal assistance programs.

Institutional procurement cards may be used to facilitate the purchase of goods or services related to the funded projects supported by the Title III grant. All such

purchases must be consistent with the UVI Procurement Card Policy, approved April 6, 2010 (available at https://www.uvi.edu/files/documents/Administration_and_Finance/Purchasing/Revised%20Procurement%20Card%20Policy_Ver%201_1%20October%201%202013.pdf). Prior written approval from the Title III Director is required for purchases made on an institutional procurement card via the following steps:

- A written request (hard copy memorandum or electronic mail) will be submitted to the Title III Director, describing the intended purchase and the cost of the good or service to be purchased.
- Supportive material (such as a pro-forma invoice) that corroborates the price of the good or service intended to be purchased must be submitted with the written request.
- The Title III Director will communicate the determination on the request in writing to the requestor within two business days of receiving all required information, with a copy to the Accounting Department for its records.
- The requestor is required to submit documentation of the completed purchase to the Title III Office within two business days of completing the transaction.

There is no need for separate approval of procurement card use for charges related to an approved Travel Authorization.

Procurement card purchases that have not been approved in advance by the Project Director will not be allowed to remain as charges on the Title III grant.

The Title III Director, in collaboration with each Activity Director is responsible for ensuring that costs charged to a project funded by the Title III award are consistent with the UVI financial management system and that no one person has complete control over all aspects of any financial transaction.

TRAVEL

- (1) Travel authorizations must be submitted to the Title III Office for approval for all travel that utilizes Title III funding. All travel authorizations must be received by the Title III Office in advance of proposed travel dates. Paperwork submitted for travel that has already occurred will not be processed. Travel authorizations should reflect only the dates spent on official travel, and should exclude any personal time that may be used on the trip.
- (2) Persons traveling on Title III funds are entitled to the following costs in advance of the journey:
 - a. full cost of the ticket (which may either be purchased through a local travel agent via Purchase Order, or online with UVI or personal credit card, which cost is reimbursed to the traveler);
 - b. full cost of projected ground transportation;
 - c. 75% of projected food and lodging costs; and

- d. 100% of any applicable registration fees, providing that a check requisition payable to the vendor is accompanied by supporting documentation.
- (3) The cost of the ticket should reflect the cost of the travel on the authorized dates. The traveler is responsible for any increase that results from the addition of personal time to a trip.
- (4) All persons who travel outside the U.S. Virgin Islands utilizing funds made available through the Title III program may be reimbursed for meals and other expenses incurred during travel. Meal costs are capped at \$51.00 per day for full days and \$38.25 for travel days.
- (5) All persons who travel outside the U.S. Virgin Islands utilizing funds made available through the Title III program are required to complete and submit a *Title III Travel Report Form* (Attachment H) within ten (10) working days of returning. A Travel Voucher, documenting trip expenditures, must also be submitted to the Accounting Department (and copied to the Title III Project Administration office) within the same time frame.
- (6) International travel requires prior approval by the federal program officer at the US Department of Education. Activity Directors are cautioned to ensure that appropriate lead time is planned in order to secure this approval, as the Department is allowed up to thirty (30) days to respond.

CONSULTANTS

- (1) The PSA Form in Attachment F and the Title III Model Contract in Attachment G shall be utilized in the hiring of any consultant to perform work that is funded in whole or in part by funds made available through the Title III program.
- (2) Activity Directors may not hire consultants to perform tasks included in the approved Title III work program unless:
 - a. there is a need in the project for the services of that consultant; and
 - b. the Activity Director cannot meet that need by using an employee rather than a consultant.
- (3) In procuring the services of a consultant, Activity Directors are directed to comply with the requirements for competition as stipulated in the UVI Financial Policy Manual and/or the Procurement Standards of 2 CFR 200. An Activity Director shall not avoid the competition requirements of the Purchasing Manual by submitting piecemeal agreements with the same consultant for the same or related project.
- (4) Employees of the University of the Virgin Islands may not be paid a consultant's fee except in unusual circumstances, and only if:
 - a. the work performed by the consultant is in addition to his or her regular departmental load; and
 - b. the consultation fee is across departmental lines or the consultation involves a separate or remote operation.
- (5) Upon presentation of appropriate itemized receipts or other detailed documentation, consultants may be reimbursed for meals and other expenses incurred during travel. Meal costs are capped at \$51.00 per day for full days and \$38.25 for travel days.

PROGRAM INCOME

Program income includes income from fees for services performed, from the use or rental of real or personal property acquired with Title III funds, and from the sale of commodities or items fabricated under an approved project. Program income does not include interest on grant funds, rebates, credits, discounts, refunds, etc. and interest earned on any of them. Except provided for otherwise, program income may be used in one of the following ways:

- (1) added to funds committed to the project by the US Department of Education and used to further eligible project or program objectives;
- (2) to finance the non-Federal share of the project or program; or
- (3) deducted from the total project or program allowable cost in determining the net allowable costs on which the Federal share of costs is based.

ALLOWABLE AND UNALLOWABLE ACTIVITIES

Pursuant to the Higher Education Act of 1965, Part B, Section 323 (a), the following activities may be conducted under Title III in support of approved projects:

- (1) Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional or research purposes;
- (2) Construction, maintenance, renovation, and improvement in classroom, library, laboratory, and other instructional facilities, including purchase or rental of telecommunications technology equipment or services;
- (3) Support of faculty exchanges, faculty development and faculty fellowships to assist these faculty members in attaining advanced degrees in their fields of instruction;
- (4) Academic instruction in disciplines in which Black Americans are underrepresented;
- (5) Purchase of library books, periodicals, microfilm, and other educational materials, including telecommunications program materials;
- (6) Tutoring, counseling, and student service programs designed to improve academic success;
- (7) Funds and administrative management, and acquisition of equipment for use in strengthening funds management;
- (8) Joint use of facilities, such as laboratories and libraries;
- (9) Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector;
- (10) Establishing or enhancing a program of teacher education designed to qualify students to teach in a public elementary or secondary school in the Territory that shall include, as part of the program, preparation for teacher certification;

- (11) Establishing community outreach programs that will encourage elementary and secondary students to develop the academic skills and the interest to pursue postsecondary education; and
- (12) Acquisition of real property in connection with the construction, renovation, or addition to or improvement of campus facilities.
- (13) Education or financial information designed to improve the financial literacy and economic literacy of students or the students' families, especially with regard to student indebtedness and student assistance programs under title IV.
- (14) Services necessary for the implementation of projects or activities that are described in the grant application and at are approved, in advance, by the Secretary, except that not more than two percent of the grant amount may be used for this purpose.
- (15) Other activities that it proposes in its application that contribute to carrying out the purpose of this part and are approved by the Secretary as part of the review and acceptance of the application.

Activity Directors managing projects approved pursuant to Part F (the Fostering Undergraduate Talent by Unlocking Resources for Education (FUTURE) Act grant program) may conduct the following activities:

- (1) Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional or research purposes;
- (2) Construction, maintenance, renovation, and improvement in classroom, library, laboratory, and other instructional facilities, including purchase or rental of telecommunications technology equipment or services;
- (3) Academic instruction in disciplines in which Black Americans are underrepresented;
- (4) Purchase of library books, periodicals, microfilm, and other educational materials, including telecommunications program materials;
- (5) Establishing or enhancing a program of teacher education designed to qualify students to teach in a public elementary or secondary school in the State that shall include, as part of the program, preparation for teacher certification; and
- (6) other activities, consistent with the institution's comprehensive plan and designed to increase the institution's capacity to prepare students for careers in the physical or natural sciences, mathematics, computer science or information technology or sciences, engineering, language instruction in the less-commonly taught languages or international affairs, or nursing or allied health professions.

A grantee may not carry out the following activities under Title III:

- (1) Activities that are not included in the grantee's approved application;
- (2) Activities described in sub-paragraph (15) above that are not approved by the Secretary of the Department of Education;

- (3) Activities that are inconsistent with any State plan of higher education that is applicable to the institution;
- (4) Activities that are inconsistent with a State plan for desegregation of higher education that is applicable to the institution;
- (5) Activities or services that relate to sectarian instruction or religious worship; and
- (6) Activities provided by a school or department of divinity. For the purpose of this section, a “school or department of divinity” means an institution, or a department of an institution, whose program is specifically for the education of students to prepare them to become ministers of religion or to enter upon some other religious vocation, or to prepare them to teach theological subjects.

ALLOWABILITY AND ALLOCABILITY OF COSTS

In addition to the legislatively allowable activities and prohibitions described above, the Education Department General Administration Regulations (34 CFR Part 74) references the Cost Principles articulated in 2 CFR 200 for determining the allowability of specific items of cost.

In determining whether costs may appropriately be assigned to the Title III program, Activity Directors and the Title III Director are to utilize the following tests of allowability:

- (1) they must be allocable to the project under the principles and methods provided in 2 CFR 200; Costs are considered allocable if:
 - (a) they are incurred specifically for the approved project;
 - (b) they benefit both the award and other work and can be distributed in reasonable proportion to the benefits received; or
 - (c) they are necessary to the overall operation of the activity, although a direct relationship to a particular cost objective cannot be shown.
- (2) they must be necessary and reasonable for proper and efficient performance and administration of the grant; The following factors should be considered in determining reasonableness:
 - (a) The costs are of a type generally recognized as ordinary and necessary for project performance.
 - (b) The costs 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.
 - (c) Appropriate restraints or requirements such as generally accepted sound business practices, arms-length bargaining, federal and territorial laws and regulations, and award terms and conditions have been imposed.
 - (d) The cost is comparable to market prices for similar goods and services.

- (e) The individuals concerned have acted with prudence in the circumstances, considering their responsibilities to the University of the Virgin Islands.
 - (f) The cost did not involve significant deviations from the University's established practices that might unjustifiably increase costs charged to the Title III award.
- (3) they must be given consistent treatment through application of those generally accepted accounting principles appropriate to the circumstances;
 - (4) they must represent the net of all applicable credits (i.e. discounts for early payment or mail-in rebates);
 - (5) they must not be included as a cost or used to meet the cost-sharing or matching requirements of another federal award;
 - (6) they must be adequately documented;
 - (7) they must be authorized or not prohibited under Virgin Islands laws and regulations;
 - (8) they must conform to any limitations or exclusions set forth in 2 CFR 200, the Education Department General Administrative Regulations (EDGAR), or the award of Title III funds to the University of the Virgin Islands as to types or amounts of cost items; and
 - (9) they must be consistent with the UVI's policies, regulations, and procedures that apply to federal awards and other UVI activities.

The table in Attachment J may be used as a guide in determining the allowability of specific items of cost.

FOOD AND MEETING EXPENSES

Food costs are generally considered to be a category of entertainment and are generally unallowable; however, in certain instances, the purchase of food using federal funds may be considered allowable. Any purchase of food is required to be approved in advance by the Title III Office. Only that food which has been authorized in advance may be purchased.

Title III funds are not to be spent for meals or coffee breaks for intramural meetings of an organization or any of its components, including, but not limited to, laboratories, departments and centers.

When certain meals are an integral and necessary part of a meeting (e.g., working meals where business is transacted), grant funds may be used for such meals. Grant funds may also be used for furnishing a reasonable amount of snacks, hot beverages or soft drinks to conference participants and attendees during periodic coffee breaks.

In making a request to purchase food, Activity Directors should submit a short narrative, which responds to the following questions and concerns.

- (1) How is the meeting integral to achieving the purposes of the grant?
- (2) Is the meeting intramural or extramural?
- (3) Why is it necessary to have food in order to have the meeting? (i.e. Is it in order to maintain continuity of the meeting?) Document the agenda, and begin/end times of the meeting. If scheduled at meal time, explain why.
- (4) If meeting is at a restaurant, or other non-university location, the venue needs to be explained; a restaurant venue could be read to imply that the meal (or entertainment) took precedence over the actual meeting.
- (5) The costs should be reasonable. (They should reflect the “prudent person” test stated in (2) (b) of the previous section.)
- (6) A list of invitees should be attached. After the meeting, a sign-in sheet, documenting the attendees should also be provided. Unless obvious, the relationships of the attendees to the project should be noted.

EQUIPMENT

The requirements of both 2 CFR 200 and 34 CFR Part 74 are applicable to the purchase, management and disposition of equipment purchased in whole or in part with funds made available through the Title III program. The policies and procedures outlined in this section are excerpted from those requirements and meant to provide some guidance to Title III Activity Directors.

- (1) Purchases for both general purpose and special purpose equipment (tangible items with a unit cost of \$5,000 or more and a usable life of 1 year or more) require the prior approval of the US Department of Education.
- (2) Unless otherwise indicated, title to equipment purchased with Title III funds vests with the University of the Virgin Islands.
- (3) Equipment acquired with Title III funds shall not be used to provide services to non-Federal outside organizations for a fee that is less than private companies charge for equivalent services, unless specifically authorized by Federal statute, for as long as the Federal Government retains an interest in the equipment.
- (4) Equipment acquired with Title III funds shall be used in the project or program for which it was acquired as long as needed, whether or not the project or program continues to be supported by Title III funds and may not encumber the property without approval of the Secretary. When no longer needed for the original project or program, the Activity Director shall use the equipment in connection with any other federally-sponsored activities, in the following order of priority:
 - (a) activities sponsored by the US Department of Education; and then
 - (b) activities sponsored by other Federal awarding agencies.
- (5) When acquiring replacement equipment, the Activity Director may use the equipment to be replaced as trade-in or may sell the equipment and use the proceeds to offset the costs of the replacement equipment subject to the approval of the Secretary.

- (6) The property management standards for equipment purchased with Title III funds includes maintaining records that incorporate:
 - (a) a description of the equipment;
 - (b) manufacturer's serial number, model number, Federal stock number, national stock number or other identification number;
 - (c) source of the equipment, including the award number;
 - (d) identification of whether title vests with the University or the Federal government;
 - (e) unit acquisition cost;
 - (f) location and condition of the equipment and the date the information was reported; and
 - (g) ultimate disposition information, including the date of disposal and sales price or the method used to determine current fair market value where a recipient compensates the US Department of Education for its share.
- (7) Not less than every two years, the Title III Director and each Activity Director shall conduct a physical inventory of equipment. Any differences between quantities determined by physical inspection and those shown in the accounting records shall be investigated to determine the causes of the difference. The Project Director and Activity Directors, in conducting the inventory are required to verify the existence, current utilization and continued need for the equipment.
- (8) Each Activity Director is responsible for maintaining a current inventory listing of project equipment, utilizing the forms provided by the Project Administration office. A copy of such listing shall be provided to the Project Administration office after each update, but not less than once each grant year concurrent with the submission of the fourth quarterly report in October.
- (9) In addition to the listing of new equipment purchased, changes in condition or location of the equipment shall be considered reasons for updating the inventory listing.
- (10) Each Activity Director is responsible to ensure that adequate safeguards are in place to prevent loss, damage, or theft of equipment purchased with Title III funds.
- (11) In the event that equipment is stolen, the Activity Director shall file a report with the University of the Virgin Islands Security Department and the Virgin Islands Police Department. Copies of both reports shall be submitted to the Title III Office and the Purchasing Department, along with inventory data (i.e. Item description, model, serial number, date of purchase, etc.) that will allow modification of the inventory records.
- (12) When an approved project no longer needs the equipment, the equipment may be used for other activities in accordance with the following standards:
 - (a) For equipment with a current per unit fair market value of \$5,000 or more, the Activity Director may retain the equipment for other uses provided that compensation is made to the US Department of Education;

- (b) For equipment with a current market value of less than \$5,000, the University may use the equipment for any purpose.

The Title III Office will provide an inventory spreadsheet and identification tags to Activity Directors in order to facilitate management of equipment records for each project funded through the Title III program.

PUBLICATIONS

- (1) Activity Directors may, subject to internal institutional policies and to any specific requirements that apply to the Title III grant, decide the format and content of the project materials that he/she publishes or arranges to have published.
- (2) Activity Directors shall ensure that any publication that contains Title III project material contains the following statements:
The contents of this (insert type of publication [i.e. book, brochure, report, film]) were developed under a grant from the US Department of Education. However, those contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.

MONITORING

The Title III Office monitors all activities that receive Title III funds, and utilizes a variety of mechanisms to ensure that programmatic objectives are realized and budgeted dollars are spent within the time frame allotted. These mechanisms include:

- (1) Monitoring of project expenditures in comparison to stated objectives and time lines;
- (2) Utilizing quarterly progress reports to monitor progress on objectives and specific tasks as stated in the project descriptions submitted to the Title III Office;
- (3) Systematic consultation with Activity Directors to identify issues that result in slow expenditure rates or delays in meeting programmatic objectives;
- (4) Scheduled semi-annual site visits with Activity Directors to assess “on-the-ground” progress;
- (5) Quarterly meetings with the President and all Activity Directors to discuss project status, accomplishments, and barriers to successful realization of objectives; and
- (6) Periodic external evaluation of projects.

CLOSEOUT PROCEDURES

- (1) Unless the U.S. Department of Education has granted an extension, each Activity Director must liquidate all obligations incurred under the award not later than 45

calendar days after the funding period or the date of completion as specified in the terms and conditions of the award.

- (2) Activity Directors are required to submit, within 45 calendar days after the date of completion of the award, all financial, progress, time and effort, and other reports as required by the terms and conditions of the award and/or the Title III Office. A model report and appropriate forms may be obtained from the Title III Director at the Office of Sponsored Programs.

ATTACHMENT A—INDIVIDUAL NARRATIVE FORM

INDIVIDUAL NARRATIVE

1. Name of Applicant Institution:

2. Activity Title:

3. Activity Number

4. Provide Narrative

ATTACHMENT B—IMPLEMENTATION STRATEGY AND TIMETABLE FORM

IMPLEMENTATION STRATEGY AND TIMETABLE FORM

1. Name of Applicant Institution: University of the Virgin Islands			2. Activity Title:		
3. Specific Tasks to be Completed	4. Primary Participants	5. Methodologies Involved	6. Tangible Results	7. Timeframe	
				From	To

ATTACHMENT C—INDIVIDUAL ACTIVITY BUDGET

INDIVIDUAL ACTIVITY BUDGET

1. Name of Institution: University of the Virgin Islands	
2. Activity Title:	3. Activity Number
4. Roster of personnel and salaries	b. Salary amount for each position
a. List of personnel (use position titles) Personnel:	
Total for personnel	
Fringe	
Travel	
Equipment	
Supplies	
Contractual	
Other	
Training	
Training Stipends	
Total	

ATTACHMENT D—MEASURABLE OBJECTIVES AND PERFORMANCE INDICATORS*

An **OBJECTIVE** is a single statement that contains:

1. A quantifiably measurable outcome
2. A completion date
3. A baseline.

OPTIONAL components of an objective include:

- The person, department or component responsible for accomplishing the objective
- Any applicable special conditions

A **PERFORMANCE INDICATOR** is a single statement that identifies a marker for determining successful implementation of the objective. A performance indicator includes:

1. The quantified performance level sought in relation to the projected outcome and baseline data presented in the objective;
2. Assessment/Evaluation method(s) and date(s)—Instrumentation/methods used to measure or determine achievement of projected performance outcomes and levels at various stages of implementation.
3. Title, date, and location of documentation—Observable/tangible evidence of achievement of projected outcomes.

NOTE: An objective may (and often does) have more than one performance indicator.

WRITING MEASURABLE OBJECTIVES AND PERFORMANCE INDICATORS SAMPLE	
Objective	Performance Indicator(s)
<p>By September 30, 2017, the Division of Access and Enrollment Services will have increased enrollment of full-time students by 10% over the fall 2010 full-time enrollment of 1,655.</p> <p>Baseline Data: Fall 2010 Enrollment; Source: 2010 Fact Book; Institutional Research and Planning</p>	<p>The 2017 fall Admissions Report on file with the Office of Institutional Research and Planning, will document a 10% increase in total full-time enrollment, based on the number of completed registrations on file with the Division of Access and Enrollment Services.</p>

**Adapted from the Dawson Group of Virginia, Inc. grant training materials*

ATTACHMENT E—TIME AND EFFORT REPORT

Title III Strengthening Historically Black Colleges & Universities

TIME AND EFFORT REPORT FOR EMPLOYEES

Quarter & Year _____

Employee Name: _____ **Emp. ID No.** _____

Position Title: _____

Program _____

Percent of Time Devoted to grant operation as stated in Plan of Operation: _____ **University** _____

Account No. _____ **Account No.** _____

Major Work Performed:

Descriptive Task	Estimated % of Time
	%
	%
	%
	%
	%
	%
	%
	%
	%
	%
Total	100 %

I certify that the above information is correct.

Employee

Activity Director or Supervisor

**ATTACHMENT F—PROFESSIONAL SERVICES
AGREEMENT FORM**

Date: _____

Name of Person: _____

Title: _____

Social Security or Tax ID Number _____

Address: _____

Telephone/Fax: _____

Duration of Agreement: See Attachment _____

Description of Service: See Attachment _____

Amount of Payment of
Honorarium: \$ _____

Account Chargeable: Contracted Services _____

Account Number: _____

Division/Department Head

Consultant

Component Head

President

ATTACHMENT G—TITLE III MODEL CONTRACT

ATTACHMENT TO PROFESSIONAL SERVICES AGREEMENT FOR (NAME OF PERSON or BUSINESS)

A. SERVICES TO BE PROVIDED BY NAME OF PERSON OR BUSINESS (NOP)

DESCRIBE SERVICES HERE OR ATTACH SEPARATE PAGE(S). INCLUDE ANY TIMELINES OR DELIVERABLES

B. REPRESENTATIONS AND WARRANTIES

(NOP) will use its best efforts to provide the services described in this Agreement and all Services will be performed in a timely fashion. (NOP) warrants that:

- (1) He/she/it has the experience, ability and expertise to perform the Services described in this Agreement;
- (2) the services will be performed in a quality, professional and workmanlike manner in accordance with the terms and conditions of this Agreement and in accordance with all federal and territorial laws, rules, and regulations; and
- (3) the services provided hereunder will be suitable for the purpose for which they are sought.

C. COMPENSATION

UVI agrees to pay (NOP) the sum of **one thousand dollars (\$1,000.00)**, payable upon receipt of invoice upon completion of satisfactory work as described in Section A.

(Optional) UVI will reimburse travel expenses for travel needed to perform the services described in Paragraph A. These expenses include airfare, lodging, and up to \$51 per day for meals for full days and \$38.25 for travel days.

OR

UVI agrees to pay (NOP) the sum of **one thousand dollars (\$1,000.00)**, payable pursuant to the schedule below:

- \$200 upon execution of this agreement;
- \$300 upon receipt of (**draft deliverable**); and

\$500 upon receipt of (final deliverable).

D. DURATION OF THIS AGREEMENT

This agreement will commence upon signing the Professional Services Agreement by all of the parties and will end upon completion of the described services by (NOP) or by (Date), whichever comes first. UVI and (NOP) agree that time is of the essence in performing the duties established in Paragraph A of this Agreement.

E. LIABILITY

(NOP) is considered an independent contractor who is responsible for all forms of health and accident insurance, as well as payment of all local and federal taxes. (NOP) is solely responsible and liable for any accident or damages resulting from this contractual agreement and for any payment due any government on behalf of (NOP).

(NOP) shall indemnify, defend and hold harmless UVI, its trustees, officers, employees, agents and students from all claims arising out of (NOP's) performance under this Professional Services Agreement, including attorneys' fees and costs, except to the extent caused by the negligence or intentional wrongdoing of UVI, its trustees, officers, employees, agents and students.

F. INSURANCE

(NOP) certifies that he/she/it has procured and shall, at his/her/its own expense, maintain in place automobile liability insurance (if applicable) and general liability insurance.

OR

(NOP) certifies that it has procured and shall, at its own expense, maintain in place comprehensive general liability insurance (and/or malpractice insurance) at all times during the term of this Agreement, naming the University as a named insured, as its interest may appear.

G. CHOICE OF LAW/VENUE

It is mutually understood and agreed that this Professional Service Agreement shall be governed by the laws of the United States Virgin Islands. Any and all suits for the enforcement of this agreement or arising for any breach of this agreement shall be instituted and maintained in a court of competent jurisdiction in the United States Virgin Islands.

H. TERMINATION

This Professional Services Agreement may be terminated upon 30 days' written notification if:

- (1) UVI and (NOP) mutually consent to termination;
- (2) UVI determines that (NOP) has defaulted on his/her/its obligations under this agreement and that he/she/it has failed to remedy such default within five days after written notification by UVI;
- (3) circumstances beyond the control of either party prevail, making continuation of the agreement impractical or impossible; or
- (4) UVI determines that continuation of the agreement is impossible, impractical or inconvenient.

I. REMEDIES

1. If this Agreement is terminated prior to completion of the contractual period pursuant to Paragraph H (1), (3) or (4), (NOP) shall cease performance of the work and take action to cancel any commitments in order to mitigate damages. Not less than 60 days after notice of termination, (NOP) shall submit a detailed claim for all costs incurred in the performance of the work, and non-cancelable commitments. If payments are less than the termination costs, UVI shall pay (NOP) the balance within 30 days. If payments already made exceed the termination costs, (NOP) shall refund the balance to UVI within 30 days.
2. If this Agreement is terminated pursuant to Paragraph H (2), UVI shall have any remedy available to it at law or in equity.

J. ACCESS TO RECORDS

(NOP) shall maintain books, records, documents, and other evidence and accounting procedures sufficient to reflect properly all costs of whatever nature claimed to have been incurred and anticipated to be incurred in the performance of this contract. The University of the Virgin Islands, the US Department of Education, and the Comptroller General of the United States and/or their duly authorized representatives shall have access to any books, documents, papers and records of (NOP) which are directly pertinent to this agreement for the purpose of making audits, examinations, excerpts and transcriptions.

K. KEY PERSONNEL (optional)

UVI considers (person(s) from company) to be key personnel in the performance of this assignment. Any change in key personnel must be approved in writing by UVI.

L. NO ASSIGNMENT

(NOP) shall not assign any of its rights or obligations under this Agreement without the prior express written consent of the University.

M. ENTIRE AGREEMENT

This written agreement contains the entire agreement between the parties and no oral statement or representations or prior written matter not contained in this instrument or incorporated herein by reference shall have any force or effect. To the extent there are any discrepancies between this Agreement and the incorporated exhibits attached hereto, the terms of the Agreement shall supersede. This agreement shall not be modified in any way except by a writing executed by both parties.

N. INTERPRETATION

It is agreed that if any provision of this agreement shall be determined to be void by any court of competent jurisdiction such determination shall not affect any other provision of this agreement, all of which other provisions shall remain in full force and effect. It is the intention of the parties hereto that if any provision of this agreement is capable of two constructions, one of which would render the provision void and the other one of which would render the provision valid, then the provision shall have the meaning which renders it valid.

O. FORCE MAJEURE

Neither UVI nor (NOP) shall be held responsible for delay or default caused by fire, riot, acts of God, terrorist acts, or other acts of political sabotage, or war, where such cause was beyond, respectively the University or (NOP's) reasonable control. (NOP) shall, however, make all reasonable efforts to remove or eliminate such a cause of delay or default and shall, upon the cessation of the cause, diligently pursue performance of his/her/its obligation under this agreement.

P. FEDERAL CONTRACTUAL REQUIREMENTS

The source of funding for this agreement is federal grant dollars from the US Department of Education. Consequently, (NOP) is required to adhere to the applicable contract provisions in 2 CFR Part 200 Appendix II, incorporated herein by reference. These requirements may be found at <http://www.gpo.gov/fdsys/pkg/CFR-2014-title2-vol1/pdf/CFR-2014-title2-vol1-part200-appII.pdf>.

Q. NOTICE

Notice regarding any matters arising from this agreement shall be served to the following addresses:

UNIVERSITY OF THE VIRGIN ISLANDS
(Activity Director)
University of the Virgin Islands
No. 2 John Brewers Bay
St. Thomas, VI 00802

CONSULTANT
(NOP)
Address
City, State, Zip Code

ATTACHMENT H—TITLE III TRAVEL REPORT FORM
TITLE III TRAVEL REPORT FORM

This form should be completed and returned to the Title III Office within ten working days after returning from a conference, workshop, or model site.

Name of Participant:

Title of Workshop/Conference:

Dates of Workshop/Conference:

Location of Workshop/Conference:

Major topics addressed:

Benefits you attained by attending:

SIGNATURES:

Traveler **Date**

Activity Director **Date**

Title III Project Director **Date**

ATTACHMENT I—TITLE III QUARTERLY REPORT FORM

TITLE III QUARTERLY PROGRESS REPORT

Report for the Quarter _____ Fiscal Year _____

Activity _____

Activity Director _____

This report is to be submitted to the Title III Office within fifteen (15) calendar days after the end of the quarter identified above.

- 1a. For each objective and/or strategy identified in your project description, indicate the level of accomplishment by percentage, as of the end of the quarter. Objectives or strategies completed in prior quarters need not be reported in this section.

Objective # _____	Percent of Completion _____ %
Objective # _____	Percent of Completion _____ %
Objective # _____	Percent of Completion _____ %
Objective # _____	Percent of Completion _____ %
Objective # _____	Percent of Completion _____ %
Objective # _____	Percent of Completion _____ %

- 1b. Provide explanation, with quantitative measures of progress, for each objective with a percentage of completion greater than zero (i.e. number of classrooms wired for internet, number of tutors hired, number of faculty trained, number of books purchased).

- 1c. Explain the status of any objective not achieved with reason for the delay, and identify a new reporting period for completion.

- 1d. Describe any changes in objectives or strategies, indicating revisions in budget,

- personnel, or timeframe for completion.
2. Describe any problems you are experiencing in making progress toward meeting program objectives.
 3. Describe purchases of equipment or software (\$1000 or more per item) made during this time period.
 4. Summarize all travel paid with Title III funds for this reporting period. Discuss any training provided, if applicable, and indicate how the training is expected to impact the duties of the person(s) trained.
 5. Summarize the activity of consultants this reporting period. Attach supporting documentation, if not previously submitted.
 6. Describe any cooperative efforts with other Title III programs, or other units of the University.
 7. Describe any building construction or renovation activity during the reporting period, providing quantitative information where appropriate (i.e. number of square feet of classroom or research laboratory space constructed or renovated).

8. Describe any new academic programs developed to provide academic instruction in disciplines in which Black Americans are underrepresented.

9. Has the grant facilitated or contributed to bringing additional resources to your institution, for example, new Federal, or local dollars that can be attributed in whole or in part to your grant activity?

10. Has the implementation of your grant project resulted in any unexpected outcomes, which affect for better or worse its capacity to fulfill the project objectives or the goals of the legislation?

Activity Director's Signature _____

Date submitted _____

ATTACHMENT J—ALLOWABILITY OF SPECIFIC ITEMS OF COST

#	Item of Cost	2 CFR 200	Remarks
421	Advertising and public relations costs	AR	
422	Advisory councils	U	Unallowable unless authorized by statute, the grantor agency, or as an indirect cost where allocable to Federal Awards.
423	Alcoholic beverages	U	Just don't do it!
424	Alumni/ae activities	U	
425	Audit and related services (Required and Other)	A\AR	Required audit costs are allowable. Other audit cost are allowable if part of indirect costs, or with advance approval.
426	Bad debts	U	
427	Bonding costs	A	
428	Collections of improper payments	A	
429	Commencement and convocation costs	U	
430	Compensation--personal services	AR	
431	Compensation--fringe benefits	AR	
432	Conferences	AR	Entertainment is unallowable.
433	Contingency provisions	U\AR	Exceptions for self-insurance reserves, pension funds and severance pay reserves.
434	Contributions and donations	U\AR	Donations rendered in form of cash, property or services made by organization, regardless of receipt, are unallowable. Donated services received are allowable with restrictions.
435	Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringement	U\AAP	Unallowable when grantee is clearly at fault. Costs of resolved proceedings may be allowable with written permission of the grantmaking agency. Cost associated with proceedings of state, local or foreign government may be allowable with restrictions and written agency permission.
436	Depreciation	AR	Must use either depreciation or use allowance method, not a combination of the two.
437	Employee health and welfare costs	A	Losses on food services are allowable if provided on a break-even basis.
438	Entertainment costs	U	Don't even think about it.

#	Item of Cost	2 CFR 200	Remarks
439	Equipment and other capital expenditures	AAP	Capital expenditures for general-purpose equipment, buildings and land requires advance written permission. Special-purpose equipment costing less than \$5,000 is allowable and items \$5,000 or more require advance approval. Capital improvements that increase value are unallowable unless permission is obtained. Equipment and other capital expenses are generally unallowable as indirect costs.
440	Exchange rates	AR	Prior approval is required only when the change results in the need for additional Federal funding.
441	Fines, penalties, damages and other settlements	U	In specified narrow situations, a grantmaking agency may allow these costs, but only with prior written approval.
442	Fund raising and investment management costs	U/AAP	Fund raising costs for the purposes of achieving project objectives are allowable with prior written approval. There are exceptions for certain investments and pension situations.
443	Gains and losses on depreciable assets	AR	
444	General costs of government	U	The chief executives of tribal governments and councils of governments who administer grants receive partial exemption.
445	Goods and services for personal use	U	Costs of housing (e.g., depreciation, maintenance, utilities, furnishings, rent), housing allowances and personal living expenses are only allowable if approved in advance by a Federal awarding agency.
446	Idle facilities and idle capacity	U/AR	These costs for idle facilities are generally unallowable. Cost for idle capacity is allowable with restrictions.
447	Insurance and indemnification	A/AR	Required insurance pursuant to the award is allowable. Other insurance is allowable with restrictions.
448	Intellectual property	A/AR	
449	Interest	U/AR	Interest on borrowed capital is unallowable. Financing costs (including interest) to acquire, construct, or replace capital assets are allowable, subject to conditions and restrictions. The restrictions are complicated and should be reviewed in their entirety.

#	Item of Cost	2 CFR 200	Remarks
450	Lobbying	U\AR	Lobbying to influence legislation and legislative outcomes is unallowable. However, there are special exceptions to otherwise unallowable lobbying costs. Technical and factual presentations directly related to a grant are allowable. Lobbying costs to reduce program costs or remove barriers to performing under a grant are allowable. Activities authorized by law to be undertaken with grant funds are allowable. There are strict documentation requirements for allowable costs.
451	Losses on other awards or contracts	U	
452	Maintenance and repair costs	A	If costs substantially increase value and otherwise allowable they must be treated as capital costs.
453	Material and supplies costs, including costs of computing devices	A	If used in connection with grant.
454	Memberships, subscriptions and professional activity costs	A\AAP\U	Memberships in business, technical and professional organizations are allowable, as are subscriptions to related periodicals. Membership dues for civic and community organizations require advance written approval. Dues for country clubs, social clubs, and organizations whose primary purpose is lobbying are unallowable.
455	Organization costs	U	Unless advance approval is given by funding source.
456	Participant support costs	AAP	With prior approval. This cost is not supported by Title III Part B and Part F grants.
457	Plant and security costs	A	Must be reasonable and necessary.
458	Pre-award costs	AR	Allowable to the extent that they would be allowable if incurred after the date of the award and only with the written approval of the Federal awarding agency.
459	Professional service costs	AR	Costs must be necessary, reasonable and directly related to project activities.
460	Proposal costs	U	Unallowable under the Title III Program
461	Publication and printing costs	A	If identified with an approved program.
462	Rearrangement and reconversion costs	A\AAP	Ordinary situations are allowable as indirect costs. Special alterations incurred specifically for the Federal award require advance approval from funding source.

#	Item of Cost	2 CFR 200	Remarks
463	Recruiting costs	AR	Relocation costs must be refunded to federal awards where such costs were charged and the employee left voluntarily within 12 months of being hired.
464	Relocation costs of employees	AR	Relocation must be for a period of not less than 12 months. Costs should be in accordance with an established written policy consistently followed by the employer.
465	Rental costs of buildings and equipment	AR	Generally allowable if reasonable and necessary. Special restrictions on "sale and lease-back" transactions, "less-than-arms-length" transactions, and rentals treated as capital leases.
466	Scholarships and student aid costs	AAP/AR	Allowable with advance approval if related to grant-sponsored training. Scholarships are otherwise allowable if beneficiary is conducting activities associated with grant or agreement. Note: This cost is not allowed with Title III Part B and Part F HBCU funds.
467	Selling and marketing	U	Generally unallowable unless qualifying as a public relations or proposal cost. May also be permitted with prior approval when necessary for the performance of the award.
468	Specialized service facilities	AR	Must be charged directly to a particular award with an approved charging methodology.
469	Student activity costs	U	Unallowable unless terms of award permit otherwise.
470	Taxes (including Value Added Tax)	A	Generally allowable unless exemptions are available. Special assessments on land representing capital improvements are unallowable as taxes otherwise chargeable.
471	Termination costs	AR	Generally speaking, termination costs are allowable when the termination is initiated by the funding source and the recipient is not at fault. Special guidelines apply to recovering termination costs.
472	Training and education costs	A	The cost of training and education provided for employee development is allowable.
473	Transportation costs	A	If identifiable to program, charge direct. Otherwise charge as indirect.
474	Travel costs	AR	Costs must be reasonable, necessary and grant related. Recipients must use Federal travel rules and rates if their policies are unacceptable to funding source.

#	Item of Cost	2 CFR 200	Remarks
475	Trustees	A	Travel and subsistence costs of trustees (or directors) at IHEs and nonprofit organizations are allowable, but are subject to the restrictions indicated in 474.

The chart above is based on an analysis of the current regulations.

- A** indicates that the item is fully allowable, without restrictions
- AR** indicates that the item of cost is allowable, but that certain restrictions or limitation apply.
- AAP** indicates that the item of cost is allowable with advance approval.
- U** indicates that the item of cost is unallowable and cannot be charged to a grant.

The "Remarks" section contains special information and describes notable exceptions as to whether a cost is allowable or unallowable