



### Cost Accounting Standards (CAS) Exception Form

Request Date: \_\_\_\_\_ Date Proposal to be submitted: \_\_\_\_\_

Principal Investigator: \_\_\_\_\_

Department: \_\_\_\_\_

Project Title: \_\_\_\_\_

Sponsor: \_\_\_\_\_

Proposal #: \_\_\_\_\_ Project # (if available): \_\_\_\_\_

The purpose of this form is to ensure compliance with the Federal government’s Cost Accounting Standards (CAS), as outlined in 2 CFR 220 (formerly OMB Circular A-21), Part F, Identification and Assignment of Facilities & Administrative (F&A) Costs, Section 6, Departmental Administrative Expenses, b., which provides direction on how different items of costs are to be designated as direct costs or F&A costs.

Principal Investigators may request exceptions to this section if there is sufficient evidence that the pending Scope of Work requires the direct charging of these expenditures due to special circumstances. To initiate a request for an exception, the Principal Investigator must **complete, sign and submit this form** to the Office of Contracts and Grants for review and consideration.

The following **criteria must be met** for F&A costs to be charged as a direct cost:

1. The costs must be specifically and readily identifiable to a specific project with a high degree of accuracy.
2. The costs are required by the project scope, due to the project’s special purpose or circumstances.
3. If contemplated at proposal, the costs must be identified in the proposal budget and specifically justified in the proposal narrative.
4. If contemplated after award, the costs must be identified and justified in this form.

#### Section I: Request To Charge Administrative/Clerical Labor Costs as Direct Costs

Exceptions to 2 CFR 220, Part F, Section 6. b. (2) will be permitted only if the following circumstances can be clearly demonstrated:

1. Administrative and clerical salaries must be specifically identified with a major project or activity, requiring administrative and clerical support, which is significantly greater than the routine level of such services provided by the unit.
2. The following examples, directly from 2 CFR 220 Exhibit C, illustrate the characteristics of a major project or activity:
  - a. Large, complex programs such as General Clinical Research Centers, Primate Centers, Program Projects, environmental research centers, engineering research centers, and other grants and contracts that entail assembling and managing teams of investigators from a number of institutions.
  - b. Projects which involve extensive data accumulation, analysis and entry, surveying, tabulation, cataloging, searching literature, and reporting (such as epidemiological studies, clinical trials, and retrospective clinical records studies).
  - c. Projects that require making travel and meeting arrangements for large numbers of participants, such as conferences and seminars.
  - d. Projects whose principal focus is the preparation and production of manuals and large reports, books and monographs (excluding routine progress and technical reports).
  - e. Projects that are geographically inaccessible to normal departmental administrative services, such as research vessels, radio astronomy projects, and other research field sites that are remote from campus.
  - f. Individual projects requiring project-specific database management; individualized graphics or manuscript preparation; human or animal protocols; and multiple project-related investigator coordination and communications.

Please provide the following information: You may attach additional sheets as necessary

1. Position Title:

2. Percentage of effort devoted to project:

3. Attach a current job description for the position.

4. Using the above examples describe the specific circumstances of the project or activity that demonstrates the need for an exemption:

## Section II: Request To Charge Non-Labor Costs as Direct Costs

### A. 2 CFR 220, Part F, Section 6. b. (3)

The direct charging of expenses for postage, local telephone, office supplies, membership dues, and general purpose equipment will be permitted only when the following circumstances can be clearly demonstrated. (Please check each one that applies, and provide the required explanation.)

Postage (including UPS, Federal Express, DHL, etc.): A significant amount of communication via mail is necessary to perform the Scope of Work, e.g., survey research, communication with subjects/participants.

Local Telephone (including cell phones): A significant amount of communication via telephone is necessary to perform the Scope of Work, e.g., survey research, communication with subjects/participants or field researchers.

Office Supplies: A significant amount of office supplies are necessary to perform the Scope of Work, e.g. preparation of surveys or other data collection tools; establishment of a business at a remote location.

Memberships and dues: Membership in professional associations is necessary to perform the Scope of Work, e.g., sharing research results.

1. Describe the specific circumstances of the project or activity that demonstrate the need for an exception.

2. Justify the quantity and cost of each item being requested.

3. Specify the account code to be used for purchase. If funds need to be moved into the appropriate code, please specify the source and destination codes.

### B. 2 CFR 220, Part F, Section 6. b. (1)

**General Purpose Equipment:** Means equipment, the use of which is not limited to research, medical or other technical activities. Examples are: computers - including laptops, servers, data storage devices and other office equipment (printer/scanners/copiers). General purpose equipment less than \$5,000 is charged to an account code with F&A. General purpose equipment \$5,000 or more is charged to a non-F&A account code.

**Please provide the following information:**

1. Why is the General Purpose Equipment needed? Describe the specific circumstances of the project that demonstrate the need for an exception.

2. How will the equipment be used to complete the tasks in the SOW and directly benefit this research project?

3. Who will use the General Purpose Equipment?

4. Why wasn't the General Purpose Equipment included in the original budget?

5. What is the cost of the General Purpose Equipment?

6. Identify below the account code(s) where funds are available in order to allow for this purchase. Also identify the account codes(s) applicable to this purchase (account code(s) from - account code(s) to).

7. Provide a statement that the General Purpose Equipment will be used exclusively for research activities and not for general business, administrative or personal purposes.

8. Did you verify that there is no like General Purpose Equipment available within the department or on the project that can be used in place of the requested equipment? Explain.

9. If the request is within six months of the end date of the project, explain how such an acquisition, so late in the project, will directly benefit the project incurring the costs.

Please attach additional pages as needed.

**Section III: Required Signatures**

I certify that these costs, normally treated as F&A costs, should be accounted for as direct costs in this project.

PI Signature \_\_\_\_\_ Date \_\_\_\_\_

Prepared by \_\_\_\_\_ Phone \_\_\_\_\_

OCG Approval \_\_\_\_\_ Date \_\_\_\_\_