About This Policy

Effective Dates:
12-26-2014

Last Updated:
01-21-2015

Responsible University Administrator:
Associate Vice President for Research

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Scope

This policy applies to Federal and Federal flow through assistance (e.g., grants and cooperative agreements) awarded to Indiana University. This is intended for use by Indiana University faculty and staff involved in the fiscal operations and administration of sponsored programs or otherwise with the authority and/or responsibility to identify expenses under sponsored programs. This policy is effective December 26, 2014 for awards incorporating the OMB Uniform Guidance.

Policy Statement

It is the policy of Indiana University that the cost of publication or sharing of research results may be charged to sponsored awards during the project period, and after the expiration but prior to the award closeout, if the costs are not incurred during the period of performance of a Federal award. Charges incurred after the award end date must be recorded in the award account at least 30 days prior to the closeout date to allow time for account reconciliation and preparation of the agency Final Financial Report.

[Reference: 2 CFR Part 200.461(3)]

Reason For Policy

The purpose of this policy is to provide direction regarding the timeframe for when the costs of publication or sharing of research results may be charged as a direct cost to sponsored projects. This policy provides guidance to ensure best practices in the fiscal management of grants and contracts at Indiana University and to meet the requirements of Office of Management and Budget Uniform Guidance Requirements, Cost Principles, and Audit Requirements for Federal Awards.

Procedure

Proposal Preparation and Submission:
Publication costs are to be specified in the proposal budget and explained in the budget justification whenever a detailed budget is provided in a proposal. When a NIH modular budget is provided in a proposal, publication costs are to be considered in determining the level of direct cost funding requested.

Award Receipt:
When the funding agency issues an award to Indiana University for the sponsored project and the requested funding for publication costs is included in the award, the publication costs may be charged as a direct cost to the sponsored award. Publication costs may be charged to a sponsored project during the award performance period and after the award end date up to 30 days prior to the closeout date, unless restricted by agency guidelines or award terms and conditions. Costs incurred after the award performance period are to be charged to a departmental account and transferred to the sponsored program account at least 30 days prior to the closeout date. The publication costs must be allocable to the sponsored award and reasonable.

Definitions

Award Closeout Date: The date by which all required project final reports are due for submission to a funding agency, typically 15 - 90 days after the end date of the award period for Federal agencies depending on agency policy. The timeframe is less for Federal flow through awards since time must be allowed for inclusion of the information in the prime awardees' final reports.

Award Period: The time period for the performance of a sponsored project as stipulated in the award documentation.

Publication Costs: Charges for publication in professional journals including author fees and reprints, as well as costs for publishing in other media, such as books, monographs, and pamphlets.

Sanctions

Charges for the cost of publication or sharing of research results that are not in compliance with this policy and procedures will be considered unallowable and will be transferred to a non-sponsored departmental account.

History

This policy was established in 2014.