# **University of Florida**

#### **CAS Exemption Form**

# Used to Support Direct Charging Costs that are Normally Treated as Indirect (F&A) Costs under Federally Funded Awards

To comply with the Federal government's <u>Uniform Guidance</u>, <u>codified at 2 CFR 200</u>, which incorporates the <u>Cost Accounting Standards</u> (<u>CAS</u>) <u>48 CFR 9905.501</u>, <u>9905.502</u>, <u>9905.505</u>, <u>9905.506</u> and establishes the principle that administrative and clerical salaries as well as other non-salary cost items such as office supplies, postage, local telephone costs, subscriptions and memberships should normally be treated as indirect (F&A) costs, the University of Florida has established a policy for charging costs directly or indirectly to federally funded sponsored projects.

A copy of the University's CAS policy is posted at Charging Costs Directly or Indirectly to Federally Funded Sponsored Projects

Principal Investigators who believe circumstances of their project warrant a CAS Exemption that would allow direct charging costs that are normally treated as indirect (F&A) must **complete and submit** this CAS Exemption Form with all required documents to the Division of Sponsored Programs (DSP) for a final determination of allowability.

Principal Investigator:  Federal Sponsor:		Project Number:
Submission Type:	□ New CAS	☐ Amendment to previous CAS

#### SECTION 1: FIXED PRICE AWARDS - SPECIAL CAS EXEMPTION CATEGORY

For projects where the award mechanism is a fixed price agreement, where payments are earned based upon meeting the specific deliverable requirements of the award, a CAS Exemption is automatically approved, except for the Group 2 cost items. All Group 2 cost items will require a CAS Exemption. The automatic CAS Exemption will be indicated on DSP's Notice of Award (NOA) as "Fixed Price Award - Not Subject to CAS". All expenditures under this special category exemption are required to be reasonable, allocable and necessary for the performance of the project or activity being supported by the award.

If the NOA for your project did not receive the "Fixed Price Award - Not Subject to CAS" designation and you believe it should have, please contact DSP at <u>ufawards@ufl.edu</u> for review and final determination.

#### SECTION 2: TO DIRECT CHARGE ADMINISTRATIVE AND CLERICAL SALARIES

Exemptions to the University's CAS policy to direct charge <u>administrative and clerical salaries</u> may be allowed only if all of the following conditions are met.		
1.	Administrative or clerical services are integral <b>1</b> to a project or activity.	□ Yes
2.	Individuals involved can be specifically identified with the project or activity.	□ Yes
3.	Such costs are explicitly included in the budget and justified in the budget narrative as Integral to the project or you have the prior written approval of the Sponsor's grant or contract officer.	□ Yes
4.	The costs are not also recovered as indirect costs.	□ Yes
5.	A minimum of 20% FTE is budgeted in the award's budget year or if less than 20% FTE special circumstances are included in the budget and budget narrative approved by the Sponsor.	□ Yes
Exemp	ve conditions are a yes, you may proceed by completing the Admin/Clerical Justification Template, at a cition Form, route for the required endorsements found in Section 5, and submit to DSP at <a href="mailto:ufawards@etermination">ufawards@etermination</a> .	

UF considers integral to mean: (1) circumstances exist where administrative or clerical services being provided are necessary for the performance of the project or activity being supported by the federal award; AND (2) a minimum of 20% FTE is budgeted in the award's budget year or if less than 20% FTE special circumstances are documented and approved by the Sponsor.

# SECTION 3: TO DIRECT CHARGE "OTHER" NON-SALARY COSTS ITEMS

**GROUP 1:** Group 1 cost items listed below will be permitted only when the items being requested can be clearly demonstrated as being essential or necessary and allocable for the performance of the project or activity being supported by the federal award.

Check each box as they apply and pro	vide the required narrative using the Oth	ner Cost Items Justificati	on Template.	
☐ Audio Visual Supplies	☐ ②Computer Devices, Desktops, Lap iPads, Displays, Computer Related A \$5,000	• •	Office Supplies	
☐ Audio Visual Devices, < \$5,000	☐ General Purpose Software (Not Specialized/Technical)		☐ Postage Stamps	
☐ <b>③</b> Cell Phones and Service Plans	☐ Local Telephone Service		☐ Subscriptions to Publications	
☐ Computer Supplies	☐ Memberships & Dues			
activity being supported by the fed and publish data necessary for the printing, transmitting, receiving an training, instruction, or curriculum as essential.  3 In the case of <u>cell phones and services</u> is solely devoted to the project.	emputer devices and accessories that must deral award. Examples of essential, might performance of the project or activity; (2 d visualizing the information in support o development activities funded by the fec- ce plans, exemptions will be approved on ave been included in the budget and/or bas require sponsor approval.	include: (1) used to acque to used to create informate the performance of the leral award; or (4) other ly where it can be show	uire, store, analyze, process, tion electronically, including e project or activity; (3) used in circumstances demonstrated in that the usage of such item	
Check each box as they apply and pro	vide the required narrative using the Oth	ner Cost Items Justificati	on Template.	
☐ Awards & Commendations	☐ Entertainment Expense	☐ Laundry Services	☐ Small Hand Tools	
☐ Accounting Services	☐ Entertainment Services	☐ Legal Services	☐ Steam	
☐ Bank Fees	☐ Event Tickets	☐ Library Resources	☐ Uniforms	
☐ Books & Publications – Non Libra	ry   Electricity	☐ Linens	☐ Utilities - Resale	
☐ Building - Supplies	☐ Electronic Data Subscriptions	☐ Moving Costs	☐ Utilities - Other	
☐ Building - Maintenance Contract	ts	☐ Natural Gas	☐ Utilities - Tax	
☐ Building - Modular	☐ Fax Machines	☐ Office Equip	☐ Utilities - Reimburse	
☐ Building - Repairs	☐ Garbage Collection	☐ Pagers	□ Vehicles >\$4,999	
☐ Cable Television	☐ Insurance – University	☐ Photocopying	□ Water	
☐ Chilled Water	☐ Janitorial Services	☐ Prof Licenses		
☐ Dorm Furniture	☐ Land Purchase	☐ Sewage		

### Instructions: "Other" Non-Salary Cost Items

To request approval to direct charge Group 1 or 2 costs items, complete the Other Cost Items Justification

Template, which collects the information requested below, attach to this CAS form, route for the required endorsements found in section V, and submit to DSP at <a href="mailto:ufawards@ufl.edu">ufawards@ufl.edu</a> for final determination.

- Describe the circumstances of the project that demonstrates why an exemption to the University's CAS policy should be granted.
- Provide the quantity of each item being requested, approximate cost of each item, and explain how the item is essential or necessary for the performance of the project or activity being supported by the federal award.
- 3. In the case of computer devices and cell phones, please explain how you will ensure the computer devices are essential and primarily being used to perform the project activities, and if cell phones/service plans explain how you will ensure they are solely being used to the project activities.
- 4. Explain why such items are significantly greater than the routine level of such items provided by the academic unit.
- 5. Attach the sponsored approved budget and budget narrative if the costs items you are requesting were included. Group 2 cost items MUST HAVE BEEN included in the sponsor approved budgeted or budget narrative or otherwise Group 2 cost items require sponsor approval for a CAS Exemption to be approved.

#### SECTION 4: COST ALLOCATION METHODS

When allocating charges to a sponsored agreement, a well defined and consistently applied cost allocation methodology is necessary. The cost allocation method used must be able to document the equitable distribution of charges to an agreement in proportion to the benefit received. There is no single best cost allocation method for documenting the distribution of charges. The documenting the allocation methods used is administered and maintained at the PI, Department and Unit levels.

## SECTION 5: REQUIRED ENDORSEMENTS

By signing below, the Principal Investigator, Department Chair/Center Director, and Dean recognize that compliance to the University's CAS policy is a shared responsibility. Payback of CAS violations and/or disallowed exemptions will be the responsibility of the College, Department, Center and Principal Investigator.

d:	Principal Investigator	Date
d:		
	Department Chair/Center Director	Date
l:		
	Dean of the College (or Designee)	Date

Submit this form and all attachments to the Division of Sponsored Programs at <u>ufawards@ufl.edu</u>, for a final determination

Administrative/Clerical  OPS Clerical  Group 1 Cost Items  Audio Visual Supplies  Audio Visual Devices, < \$5,000  Cell Phones/Service Plans  Computer Supplies  Computer Devices, Desktops, Laptops, Tablets, iPads, Displays, & Other Computer Related Accessories, < \$5,000  General Purpose Software  Local Telephone  Memberships  Office Supplies  Office Supplies  Subscriptions  Group 2 Cost Items will be identified below: (completed by DSP)	Approved		Comments			
Group 1 Cost Items  Audio Visual Supplies Audio Visual Devices, < \$5,000 Cell Phones/Service Plans Computer Supplies Computer Devices, Desktops, Laptops, Tablets, iPads, Displays, & Other Computer Related Accessories, < \$5,000 General Purpose Software Local Telephone Memberships Office Supplies Postage Stamps Subscriptions  Group 2 Cost Items will be identified below: (completed by DSP)		Administrative/Clerical				
□ Audio Visual Supplies   □ Audio Visual Devices, < \$5,000   □ Cell Phones/Service Plans   □ Computer Supplies   □ Computer Devices, Desktops, Laptops, Tablets, iPads, Displays, & Other Computer Related Accessories, < \$5,000   □ General Purpose Software   □ Local Telephone   □ Memberships   □ Office Supplies   □ Postage Stamps   □ Subscriptions    Group 2 Cost Items will be identified below: (completed by DSP)		OPS Clerical				
Audio Visual Devices, <\$5,000	Group 1 Cost	Items				
Cell Phones/Service Plans Computer Supplies Computer Devices, Desktops, Laptops, Tablets, iPads, Displays, & Other Computer Related Accessories, < \$5,000 General Purpose Software Local Telephone Memberships Office Supplies Postage Stamps Subscriptions  Group 2 Cost Items will be identified below: (completed by DSP)		Audio Visual Supplies				
Computer Supplies Computer Devices, Desktops, Laptops, Tablets, iPads, Displays, & Other Computer Related Accessories, < \$5,000 General Purpose Software Local Telephone Memberships Office Supplies Postage Stamps Subscriptions  Group 2 Cost Items will be identified below: (completed by DSP)		Audio Visual Devices, < \$5,000				
Computer Devices, Desktops, Laptops, Tablets, iPads, Displays, & Other Computer Related Accessories, < \$5,000 General Purpose Software Local Telephone Memberships Office Supplies Postage Stamps Subscriptions  Group 2 Cost Items will be identified below: (completed by DSP)		Cell Phones/Service Plans				
iPads, Displays, & Other Computer Related Accessories, < \$5,000  General Purpose Software  Local Telephone  Memberships  Office Supplies  Postage Stamps  Subscriptions  Group 2 Cost Items will be identified below: (completed by DSP)		Computer Supplies				
Local Telephone Memberships Office Supplies Postage Stamps Subscriptions  Group 2 Cost Items will be identified below: (completed by DSP)		iPads, Displays, & Other Computer Related				
☐ Memberships   ☐ Office Supplies   ☐ Postage Stamps   ☐ Subscriptions    Group 2 Cost Items will be identified below: (completed by DSP)  ☐  ☐  ☐  ☐  ☐  ☐  ☐  ☐  ☐  ☐  ☐  ☐  ☐		General Purpose Software				
□ Office Supplies   □ Postage Stamps   □ Subscriptions    Group 2 Cost Items will be identified below: (completed by DSP)  □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □		Local Telephone				
Postage Stamps		Memberships				
Group 2 Cost Items will be identified below: (completed by DSP)		Office Supplies				
Group 2 Cost Items will be identified below: (completed by DSP)		Postage Stamps				
		Subscriptions				
	Group 2 Cost	Items will be identified below: (completed by I	OSP)			
Division of Sponsored Programs  Date						
DSP Additional Comments:		Division of Sponsored Programs  Date				

- Hyperlink To: <u>Admin/Clerical Justification Template</u>
- Hyperlink To: Other Non-Salary Cost Items Justification Template