

## Changes from the Uniform Guidance that Impact Proposal Submission

- Cost Sharing
  - **What were the major changes?**  
Cost sharing cannot be used during merit review of proposals, unless specified in the notice of funding opportunity.
  - **How will this change impact proposal submission?**  
PIs should no longer be volunteering cost share at the proposal level. Only the mandatory cost share outlined in the notice of funding opportunity will be allowed in the proposal.
  
- Charging Computing Devices to an Award
  - **What were the major changes?**  
Computing device purchases less than GW's capitalization threshold of \$2,500 are now considered a supply on awards. They are only required to be essential and allocable, not solely dedicated to the award.  
  
Computing devices are machines used to acquire, store, analyze, process, and publish data or other information electronically, including accessories for printing, transmitting, and receiving or storing electronic information.
  - **How will this change impact proposal submission?**  
Computing devices can now be included in the supply budget line on a proposal.
  
- Participant Support Costs
  - **What were the major changes?**  
Participant support costs are now **uniformly defined** by Federal agencies as direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.
  - **How will this change impact proposal submission?**  
Proposals that include participant support costs should exclude these costs from the MTDC base since they are not subject to the application of indirect costs.  
Keep in mind that re-budgeting from participant support costs into another category will require prior approval.
  
- Publication Costs
  - **What were the major changes?**  
Publication costs are still allowable costs after the award end date but before award closeout.
  - **How will this change impact proposal submission?**

Publication costs can be included in the budget even if it is anticipated that they will not be charged until after the award has ended.

- Short-Term Visa Costs
  - **What were the major changes?**

To account for the costs associated with recruitment, short-term visa costs (as opposed to long-term, immigration costs) are now allowable as direct costs if they can be clearly identified as directly connected to the work performed on the Federal awards.
  - **How will this change impact proposal submission?**

Short-term visa costs can now be included in the proposal budget if the PI anticipates that these costs will be needed in the recruitment of award personnel.
  
- Direct Charging of Administrative and Clerical Salaries
  - **What were the major changes?**

While administrative and clerical salaries should still normally be treated as indirect costs, the Uniform Guidance clarified the instances when these costs can be directly charged to the Federal award. It also removed the “major projects” designation from A-21 in favor of ensuring that if the outlined criteria were met, administrative and clerical salaries could be charged to awards as appropriate.
  
  - **How will this change impact proposal submission?**

The criteria for approval of the administrative and clerical salaries include ALL of the following:

    1. Administrative or clerical salaries are integral to the award. This means that the services are essential, vital, or fundamental to fulfilling the scope of work for the project. Your sponsored projects administrator can help you determine if your proposed costs fulfill this requirement,
    2. Individuals involved can be specifically identified with the project or activity,
    3. Such costs are explicitly included in the budget or have the prior written approval of the federal awarding agency, and
    4. The costs are not also recovered as indirect costs.

**Do you have additional questions? Please contact your Sponsored Projects Administrator or [askovpr@gwu.edu](mailto:askovpr@gwu.edu)**