Uniform Guidance Requirements – Administrative & Clerical Salaries

The new Uniform Guidance that determines financial policy for all federal grants and cooperative agreements clearly outlines when administrative and clerical salaries are allowed to be charged to a federal award. The Uniform Guidance states that salaries of administrative and clerical staff should normally be treated as indirect (F&A) costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

1. Administrative or clerical services are integral to a project activity;
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.

Integral implies that the work required is significantly above the normal duties required of the administrative or clerical staff member. This would normally be expected to be 15-20% or greater of their effort. Routine duties include purchasing items, paying invoices, preparing financial reports and reconciling funds.

Proposal Stage
Prior to including administrative or clerical salaries in a federal proposal’s budget, department administrators should determine if the following criteria, in addition to those listed above, are met:

1. The administrative or clerical salaries meet the definition of unlike purpose and circumstance, and
2. The administrative or clerical salaries are integral to the project and are required to meet project objectives.
3. The proposal budget justification must include the following statement:
   “All administrative support as listed in direct personnel costs is integral to the project; can be specifically identified with the project; and is not incorporated in F&A indirect cost calculations. By including these costs at time of proposal, CSU considers prior approval is granted by the sponsoring agency should the proposal be funded.”

Responsibilities
The principal investigator (PI) and the academic department, institute or center responsibilities include:
• Notify the appropriate proposal support and oversight personnel of the need to direct
charge administrative or clerical salaries (Proposal support varies by unit and college but
generally indicates the person or person’s responsible for helping finalize, review and
submit proposals within the unit, department, college, or otherwise by the CSU
Sponsored Programs office.)
• Document the request for direct-charged administrative or clerical salaries in the budget
and budget justification with sufficient detail to describe the necessary benefit to the
project
• Ensure that only approved administrative or clerical salaries are direct-charged to awards
on which those particular salaries have been approved
• Identify and remove any unapproved administrative or clerical salary charges during
routine reviews of financial activity on all federally sponsored awards for which they are
responsible

The college-level research administration office and/or pre-award office responsibilities include:
• Review requests and proposals for direct charging of administrative or clerical salaries to
ensure they meet the criteria identified above
• Ensure sponsor approval (approved budget or other written approval)
• Provide guidance to the PI and department staff about administrative or clerical salaries
on proposal budgets