

Guidance from COGR-NIH Proposed Administrative Support Costs – May 19, 2009

Question: Can ARRA grant budgets include direct costs to address ARRA administrative and reporting requirements?

No. It has been determined that ARRA requirements do not provide sufficient justification to support the provision of direct costs for administrative support in addition to the Facilities and Administrative (F&A) costs in the awarded budget.

NIH staff will continue to evaluate direct costs requested for administrative support using the guidance provided in OMB Circular A-21 F.6.b.(2)

<http://www.whitehouse.gov/omb/circulars/a021/a021.html>.><http://www.whitehouse.gov/omb/circulars/a021/a021.html>.

However, ARRA requirements will not be considered in this determination, because they are incorporated within the core administrative support for the project, which is reimbursed to the institution through the provision of F&A costs.

When direct costs have been requested to address ARRA administrative and reporting requirements in requested budgets, NIH staff will make appropriate adjustments . Revised budgets submitted solely to remove administrative costs will not be accepted.

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