



University of Puerto Rico Comprehensive Cancer Center Indirect Cost Recovery and Distribution Policy

A. PURPOSE

The University of Puerto Rico Comprehensive Cancer Center (UPR-CCC) recovers costs incurred for common functions or objectives associated externally funded activities by charging an indirect cost rate on each grant or contract submitted through the Institution. The Indirect Cost Recovery and Distribution Policy and related procedures are intended to distribute indirect costs generated from externally sponsored grants, contracts, and cooperative agreements. This policy is established in accordance with the federal government's Office of Management and Budget (OMB) Uniform Guidance.

B. SCOPE

Indirect costs are charged to all externally sponsored projects, unless specifically prohibited by the funding agency. Per regulations in the Uniform Guidance, Indirect Costs will be recovered at the approved rate by the Cognizant Agency, except when the funding guidelines indicate otherwise. In exceptional cases, federally sponsored projects that require waivers or changes to the established Indirect Cost Rate must be approved by both the Executive and Deputy Directors of the Center.

C. APPLICABILITY

This policy applies to all sponsored projects administered by the UPRCCC, regardless of sponsor, sponsor type and indirect cost rate charged to sponsor.

D. DEFINITIONS:

Credit Distribution: Allocation of an individual's relative contributions towards project objectives outlined in the proposal, expressed in percentage; allows the Center to recognize and record such contributions, and appropriately distribute recovered indirect costs to the Research Incentives Accounts.

Direct Costs: Direct costs are costs that can be identified specifically with federal and nonfederal activities and therefore are charged to that activity. The accounting system records these costs as they are incurred within the series of accounts assigned for that purpose and further distribution is not required. The Center treats all costs as direct costs except general administration and general expenses.

General Fund: This fund accounts for all of the Center's activities, except for those activities related to the sponsored projects.

Indirect Cost: The costs of administrative and support functions of the Center. Costs incurred for common or joint objectives that cannot be readily assigned to a particular sponsored project or any other institutional activity. These include only general administration and general expenses as stated in the Indirect Cost Rate Proposal to the Department of Health and Human Services (DHHS). Additionally, represent overhead expenses incurred during the implementation of externally-funded projects.

Indirect Cost Rate: The total indirect costs attributable to research are compared to the total direct costs of research to derive the percentage of indirect to direct. This percentage, the indirect cost rate, is then applied to the direct costs of research and is the means by which the Center is reimbursed for indirect costs associated with direct cost expenditures. The application of the indirect cost rate allows the Center to recover some of the costs of doing research that are not readily identified with a particular project or activity, but are necessary for the general operation of the organization and support its research mission.

Indirect Cost Rate Agreement: The UPR-CCC's negotiated agreement with the cognizant agency, in the Center's case the Department of Health and Human Services (DHHS), to determine the Indirect Distribution Base that the Center will utilize for a pre-determined period of time.

Indirect Distribution Base: A defined group of direct cost expenditures to which the indirect rate is applied to determine the total indirect costs of a sponsored project. The two most commonly used distribution bases are Modified Total Direct Costs (MTDC) or Salary and Wages (S&W) however, some non-federal sponsors may have developed other distribution bases such as Total Direct Costs (TDC).

MTDC: all direct expenditure categories excluding the following: equipment, tuition remission, rental costs, scholarships and fellowships, patient care expenses, and subcontract costs over \$25,000.

S&W: the direct salary and wage expenditures of the sponsored research agreement. The Center's federally negotiated agreement utilizes this as the distribution base to calculate indirect costs.

Key Personnel: The Principal Investigator (PI), Project Director (PD) and other individuals who design, conduct, and report research, or who contribute to the scientific development or execution of a project in a substantive, measurable way, regardless of compensation.

Principal Investigator (PI): A UPR-CCC appointed faculty or staff member who bears responsibility for the intellectual leadership of a project. The PI accepts overall responsibility for directing the research, financial oversight, and compliance with relevant Center policies and sponsor terms and conditions.

Puerto Rico Cancer Community Pilot Research Program (PRCCPRP): An UPR-CCC research program to stimulate new and community-based investigators in the field of cancer research.

Research Incentives Accounts (RIA): An account created for UPR-CCC appointed faculty and staff that serve as key personnel in a sponsored project and receive a credit distribution for their contribution to the project.

Sponsored Project: Any externally funded research, training, evaluative testing, or public service activity directed by UPR-CCC faculty or staff as part of their institutional work that requires the Center to perform a specified program or deliver a specified product. Regardless of the type of funding or funding mechanism.

E. RESPONSIBILITIES

Principal Investigator(s): will determine and certify the credit distribution percentage when the sponsored project has more than one Principal Investigator or Key Personnel.

Office of Sponsored Programs: will collect and keep record the Credit Distribution Percentage Form. Upon receipt of the award, the Sponsored Programs Accountant will certify the dollar amount of indirect costs awarded to the Project and forward the distribution forms to the Finance Department for Research Incentives Accounts to be created and/or credited when payments are received. The Office of Sponsored Programs will keep track of the accounts and available funding.

Finance Department: will create Research Incentives Accounts for each faculty and key personnel that receives credit distribution from recovered indirect costs.

F. POLICY:

Indirect cost recovered from externally-funded activities will be distributed as follows:

Item Fund	% distribution
General Fund	60%
Research and Education Support Fund	20%
Puerto Rico Cancer Community Pilot Research Program (PRCCPRP)	9%
Research Incentive Account	11%

G. PROCEDURES:

1. Distribution of Funds

The funds will be distributed as indicated above. At the end of each fiscal year an analysis will be done to determine the amount of remaining indirect costs to be distributed according to the following accounts:

- a. **General Fund:** Funds allocated to the general fund will help defray overhead expenses included in the Administrative Costs Pool of the Indirect Cost Proposal to DHHS. The distribution of funds recovered through indirect costs to the Center's divisions, departments and offices is determined in the Cost Allocation Plan of the institution.
- b. **Research and Education Support Fund:** The Research and Education Support Division will utilize the funds recovered through indirect costs for training, professional development activities, professional travel, research support and education project development, equipment and supplies, books and journals and any other allowable cost necessary to advance the objectives of the Research and Education Support Division.

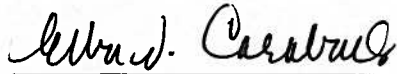
- Food, beverage and gift cards purchases are not allowable.
- c. **PRCCPRP:** Funds allocated to the Cancer Community Pilot Research Program will be used to fund local projects with promising new approaches and discoveries to advance cancer research and research training in Puerto Rico. The portion of funds allocated to the PRCCPRP is deposited into an account to sponsor a competitive cancer research program for new researchers. Allocation of funds to the PRCCPRP are made on an annual basis and are based on actual projects account expenditures.
 - d. **Research Incentives Accounts (RIA):** RIA accounts will hold funds for UPR-CCC appointed faculty and staff to pay for expenses related to research support and professional development activities, such as: cost of publishing, books and journals; professional travel; research supplies and equipment; research project development expenses (i.e. pilot projects, consultant fees and grant writing), and post-doctoral researchers and student assistants expenses (i.e. stipends, salaries, professional development or travel). Food, beverage and gift cards purchases are not allowable. Supplemental compensation is not allowable.

Note that these percentages will be applied to a prorated value of the indirect dollars earned for the fiscal year. All distributions of indirect cost revenue remain the property of UPRCCC and are to be managed by the staff associated to the UPRCCC to facilitate additional research opportunities in cancer fields. A brief annual update of how the funds were spent will be expected from the Office of Sponsored Programs and the Finance Department.

2. Research Incentives Account (RIA) Management

- a. RIA are created by the Finance Department for each PI or key personnel participating in a sponsored program. Accounts will be credited according to the Credit Distribution prepared at the time of proposal submission.
- b. Accounts will be credited when Indirect Costs are recovered by the UPR-CCC. Accounts cannot receive or use funds based on estimated or future indirect costs recovery.
- c. RIA funds will be available and not expire as long as the account is utilized at least once per fiscal year.
- d. RIA funds can only cover research related or professional development expenses.
- e. The Office of Sponsored Programs will monitor, but not approve, funds in individual accounts.
- f. Personnel with RIAs must initiate and track expenses and balances of the accounts.
- g. RIA funds remain in the individual's RIA as long as the faculty or staff has an appointment with the Center.
- h. PIs that retire or leave the UPRCCC: If the PI plans to continue to perform research/projects as an emeritus faculty member, the account remains open and available for use. If not, the account will be closed and the remaining funds in the account will be transferred to the Research and Education Support Fund.

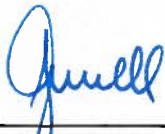
This policy is recommended by the Research and Education Support Division Director on:



Research & Education Support
Division Director

Date: 2-26-2018

This policy is approved by the UPRCCC's Executive Director on:



Executive Director

Date: 2/26/2018