

# Cost Sharing on Sponsored Awards

**Policy Owner:**

Office of the Vice Provost for Research

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**Policy Contact:** Associate Vice Provost  
for Research Administration &  
Development

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## REASON FOR POLICY

This policy establishes the requirements for the commitment of cost share associated with sponsored awards, as well as the requirements for identification, funding, accounting and reporting of committed cost sharing / matching, including in-kind contributions.

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## POLICY PRINCIPLES

Cost sharing is any project cost that is not paid or reimbursed by the sponsor to support the scope of work defined by the award. Matching refers to the sponsor requirement that the University match grant funds in some proportion with cost shared funds. This policy applies to cost sharing on both Federal and non-Federal awards received by the University.

There are three types of cost sharing, two of which are required to be tracked and reported.

- **Mandatory Cost Sharing:** Project costs that are not paid by the sponsor and are required as a condition of the award. Mandatory Cost Sharing must be tracked and reported. The cost sharing activity becomes a binding commitment which the University must provide as part of the performance of the sponsored award.
- **Voluntary Committed Cost Sharing:** Cost sharing which is not required by the sponsor as a condition of obtaining an award but pledged on a voluntary basis and included in the proposal. Voluntary Committed Cost Sharing must be tracked and documented. It may also be required to be reported to the sponsor.
- **Voluntary Uncommitted Cost Sharing:** Cost sharing that is not included as part of the submitted proposal or subsequent award. Voluntary Uncommitted Cost Sharing does not need to be tracked or reported and is not covered by this policy.

Voluntary committed cost sharing must not be included as part of a proposal submission. Cost sharing is not expected under Federal research proposals and cannot be used as a factor during merit review of applications or proposals unless it is specified in a notice of funding opportunity. Certain funders may also prohibit voluntary committed cost-sharing. For example the National Science Foundation prohibits inclusion of voluntary committed cost sharing, except when required in an NSF solicitation.

Committed cost sharing results in an increase in workload for department personnel and increased use of University resources as it is required to be tracked and documented. In addition, committed cost sharing expenses are included in the organized research direct cost base used to calculate the University's facilities

and administrative (F&A) rate. An increase in the organized research direct cost base results in a reduction in the F&A rate and therefore reduces indirect cost reimbursement to the University. For these reasons, voluntary committed cost sharing must be avoided.

Sources of cost sharing contributions:

- **University cost sharing:** commitments that are paid from the University funds using gift, department funds, or other non-sponsored sources.
- **Sponsored cost sharing:** commitments that are paid from non-federal sponsored awards at Tufts University. The cost sharing source agency should be notified. Note that expenditures on a federal sponsored project cannot be used to meet cost-sharing requirements on other federal awards.
- **In-kind cost sharing:** third party non-cash contributions of time, talent, or resources. Third-party in-kind contributions may be in the form of real property, equipment, supplies and other expendable property, or goods and services directly benefiting and specifically designated for the project. An in-kind or matching contribution made by a party other than Tufts requires documentation from the third party supporting the use of the funds as in-kind/matching and may require a certification of fair market value.

Cost sharing expenses must be:

- Necessary and reasonable for the performance of the project objectives
- Allowable in accordance with sponsor terms
- Reasonable, allocable, and consistent with the terms of the award
- Incurred during the project period
- Verifiable from the University's records

Unrecovered Facilities and Administrative costs (F&A), including indirect costs on cost sharing or matching, may be included as part of cost sharing or matching only prior approval from the awarding agency, unless the agency has waived such approval (see [Research Terms and Conditions](#)).

The following expenses **cannot be offered as cost-sharing commitments** in sponsored project proposals:

- Unallowable costs, as defined in sponsored terms or sponsor regulations
- Costs that are paid by the federal government cannot be used to meet cost-sharing requirements on other federal awards unless authorized by federal statute
- Funds from any source which have already been committed as cost sharing to another project cannot be committed twice
- Income earned under the grant may not count as cost sharing unless expressly authorized by the granting agency.

The source of funding for mandatory or voluntary committed cost sharing or required matching must be clearly identified during the proposal submission and approved by the School Dean and the Office of the Vice Provost for Research.

The Local Research Administrator (LRA) in consultation with the Principal Investigator (PI) is responsible for maintaining records of all costs associated with mandatory and voluntary committed cost sharing and in-kind/matching. The LRA will work with Post-Award Research Administration to ensure the cost sharing commitments are being identified, tracked, and documented appropriately. Based on confirmation from the LRA on behalf of the PI that cost sharing commitments have been met and documented, Post-Award will report the cost share expenses to sponsors if and as required by the terms of the sponsored awards.

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## RELATED LINKS AND INFORMATION

[Part 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS](#)

[Research Terms and Conditions](#) (side by side with the Uniform Guidance)