

## Determination of On and Off Campus Activity

Icahn School of Medicine at Mount Sinai's (ISMMS) new Facilities and Administrative Costs Rate (F&A) Agreement with the DHHS, dated 10/15/2021, included an updated definition relating to the determination of On- and Off Campus activities: "Grants or contracts will not be subject to more than one F&A cost rate. If more than 50% of a project is performed off-campus, the off-campus rate will apply to the entire project". It is imperative that sponsored project budgets be prepared in accordance with this new methodology. Government regulations require consistency between the proposed performance execution plans and the actual performance.

**Therefore, a sponsored project may only use one F&A rate, either On- or Off- Campus. The prior methodology of applying a mixed-site rate will no longer be used.**

### Applicability:

The F&A Rate Agreement is applicable to all Federally funded sponsored programs irrespective of whether ISMMS is serving as the prime applicant or subrecipient.

- a) For Grant, Cooperative Agreements, and Other Transactions, this revision will apply to competing awards (ie, New, Competitive Renewal or Resubmission) issued on or after 10/15/2021.
- b) Non-competing awards will continue to use the mixed-site rate until the next competing segment.
- c) For contracts, this revision will apply to the next funding increment, whether or not the next increment is competitive. Finance will start charging at the single rate beginning 1/1/2022.

### Definitions:

#### Facilities and Administrative Costs

Facilities and Administrative Costs ("F&A", "indirect", or "overhead") are those costs associated with providing and maintaining the infrastructure that supports the sponsored projects enterprise which cannot be easily identified with a specific project. F&A costs are classified in two broad categories: "Facilities" and "Administrative". "Facilities" include libraries, buildings, grounds and buildings maintenance, etc. "Administrative" is departmental administration, general administration and central sponsored programs administration.

#### On Campus

On-campus is defined as activity that is conducted in facilities owned or leased by ISMMS and for which ISMMS is bearing the facilities costs, from ISMMS funds. These include Mount Sinai Hospital, and other leased space.

#### Off Campus

Off-campus is defined as activity that is conducted in facilities not owned or leased by ISMMS and not otherwise paid for by ISMMS from ISMMS funds. These may include, but are not limited to, facilities located at certain affiliate institutions, such as the James J. Peters VA Medical Center.

If a sponsored project is performed in leased or rented space, and the lease or rent is a direct charge to the award, (ie, not paid for by ISMMS funds) then the project is considered Off-Campus.

## **Determination of On-Campus vs. Off-Campus**

The criteria for determining whether the activity is conducted on-campus or off-campus for a sponsored project is as follows:

When 50 percent or more of proposed project activities are conducted in facilities owned or leased by ISMMS, the on-campus F&A cost rate applies; when less than 50 percent of proposed project activities are conducted in facilities owned or leased by ISMMS, the off-campus F&A cost rate (26%) applies. When the off-campus rate is to be used, the proposal narrative and supporting documents should clearly demonstrate the fact that more than 50% of the ISMMS project activities are to be conducted off-campus.

For projects with both on- and off-campus activities, the methodology that should be used to determine whether the majority of the project activities is performed on or off -campus, should include ISMMS project personnel (faculty, staff, and students) proposed effort and cost sharing, if any, related to the activities of the project.

Use of the off campus rate requires approval by the School CFO as part of the grant application approval process.

Note that tasks performed by consultants, vendors, fee-for-service providers or sub recipients should not be considered when determining if the project qualifies as on-campus or off-campus.

Examples of activities that do NOT constitute the use of the Off-Campus rate:

- Routine field work, such as testing or data and sample collection for environmental research
- Collection of observational data in schools
- Conference or meeting travel
- Community outreach projects that utilize local community buildings (eg. temples, community centers, etc) for engagement activities
- Multi-site clinical trials, where the clinical enrollment activities take place at external enrollment sites.

## **Roles and Responsibilities**

PI and Department Administrators are responsible for the following:

- Initial determination of which rate should be used. In cases where there is doubt consult with the Grants and Contracts Office (GCO) and/or Sponsored Projects Finance (SPF) to make the appropriate determination. Maintain internal documentation of determinations when work is done partially on- and off campus and provide such documentation to GCO and/or SPF during the application process, and/or upon request.
- Certify to the majority of work being done on- or off- campus in InfoEd.
- Prepare budgets and budget justifications based on the above determination.
- Obtain approval from the School CFO for use of off-campus rate.
- Report to GCO and SPF any changes in location of performance of the project that may affect the on- or off-campus determination.

The submitting Office (GCO) is responsible for the following:

- In cases where there is ambiguity, assist the PI and department administrator to determine whether on- or off-site rate should apply.
- Ensure the submitted budget reflects the appropriate rate.

- Work with the School CFO and/or the Sponsored Projects Finance (SPF) as needed in making the final determination of the applicability of on- or off-campus rate. Ensure CFO approval is received when the off-campus rate is used.

**Questions:**

All questions and inquiries should be directed to both GCO and SPF at:

SPF: 646-605-4023

GCO: 212-824-8300; or your department's [assigned](#) GCO Grants Specialist and/or AOR