

Appendix 1: Public Policy Requirements, Objectives and Appropriation Mandates

Y = this requirement applies when we fall into the indicated category of recipient

NA = this requirement is not applicable when we fall into the indicated category of recipient *

Requirement, Objective, or Appropriation Mandate	Grantee (i.e. when we hold the prime contract)	Subaward/Consortium Participant (i.e. when we are a subcontractor on someone else's grant)	Contractor under Grant (routine goods/services) (i.e. if we are performing services such as NZGL sequencing, and not participating in the research project)
Acknowledgment of Federal Funding (Appropriation Mandate) 4.2.1	Y	Y	NA
Age Discrimination Act of 1975 4.1.2.4	Y (NA to foreign and international organizations)	Y (NA to foreign and international organizations)	Y (NA to foreign and international organizations)
Animal Welfare 4.1.1	Y	Y	Y
Architectural Barriers Act of 1968 10.10	Y (Construction grants and any grant involving major A&R)	Y	Y
Certificates of Confidentiality 4.1.4.1	Y	Y	Y
Certification of Filing and Payment of Taxes (Appropriation Mandate) 4.2.2	Y	NA	NA
Civil Rights Act of 1964 (Title VI) 4.1.2.1	Y (NA to foreign and international organizations)	Y (NA to foreign and international organizations)	Y (NA to foreign and international organizations)
Clean Air and Clean Water Act 10.10	Y (Construction)	Y	Y

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	grants only); for contracts exceeding \$100,000		
Clinical Trials.gov 4.1.3	Y	Y	NA
Coastal Zone Management Act of 1972 10.10	Y (Construction grants only)	Y	Y
Confidentiality of Alcohol and Drug Abuse Patient/Client Records 4.1.4.2	Y	Y	Y
Conservation of Petroleum and Natural Gas (EO 12185) 10.10	Y (Construction grants only)	Y	Y
Controlled Substances 4.1.5	Y	Y	Y
Copeland Act, when required by statute 10.10	Y (Construction grants only)	Y	Y
Data and Safety Monitoring 4.1.15.6	Y	Y	Y
Davis-Bacon Act, when required by statute 10.10	Y (Construction grants only)	Y	Y

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Debarment and Suspension 4.1.6	Y (NA to certain foreign organizations)	Y (NA to certain foreign organizations)	Y If contract equals or exceeds \$25,000 (NA to certain foreign organizations)
Dissemination of False or Deliberately Misleading Scientific Information (Appropriation Mandate) 4.2.3	Y	Y	Y
Drug-Free Workplace 4.1.7	Y	NA	NA
Earthquake Hazards Reduction Act of 1977 and Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction (EO 12699) 10.10	Y (Construction grants only)	Y	NA
Education Amendments of 1972 (Title IX) 4.1.2.2	Y (NA to foreign and international organizations)	Y (NA to foreign and international organizations)	Y (NA to foreign and international organizations)
Endangered Species Act of 1973 10.10	Y (Construction grants only)	Y	Y
Equal Employment Opportunity 10.5	Y (Construction	Y	NA If under \$10,000

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	grants and any grant involving major A&R)		
Federal Funding Accountability and Transparency Act (FFATA) 4.1.8 and 8.4.1.4.4	Y	NA If under \$25,000	NA If under \$15,000
Federal Information System Security Management Act 4.1.9	Y	Y	Y
Financial Conflict of Interest 4.1.10	Y (NA to Phase I of the SBIR/STTR programs and to Federal institutions)	Y	NA
Flood Disaster Protection Act of 1973 – Flood Insurance 10.10	Y (Construction grants only)	NA	NA
Fly America Act 4.1.11	Y	Y	Y
Health and Safety Regulations and Guidelines 4.1.12	Y	Y	Y
Health Insurance Portability and Accountability Act (HIPAA) 4.1.4.3	Y (if a covered entity)	Y (if a covered entity)	Y (if a covered entity)

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Hotel and Motel Fire Safety Act of 1990 14.6.1	Y (Conference Grants Only)	Y	Y
Human Embryo Research and Cloning Ban (Appropriation Mandate) 4.2.4	Y	Y	Y
Human Stem Cell Research 4.1.13	Y	Y	Y
Human Fetal Tissue Research (Including Transplantation Research) 4.1.14	Y	Y	Y
Human Subjects Protections 4.1.15	Y	Y	Y
Inclusion of Children as Subjects in Clinical Research 4.1.15.7	Y	Y	NA
Inclusion of Women/Minorities as Subjects in Clinical Research 4.1.15.8	Y	Y	NA
Intergovernmental Review of Federal Programs under EO 12372 10.10	Y (Construction Grants Only)	NA	NA
Investigational New Drug Applications/Investigational Device Exceptions 4.1.16	Y	Y	Y

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Labor Standards under Federally Assisted Construction 10.5.3	Y (Construction Grants and major A&R Contracts Exceeding \$100,000)	NA	Y
Lead-Based Paint Poisoning Prevention Act 10.10	Y (Construction Grants Only)	Y	Y
Limited English Proficiency 4.1.2.5	Y	Y	NA
Lobbying (Federalwide Certification) 4.1.17	Y Certification required if total costs expected to exceed \$100,000	Y Certification required if greater than \$100,000 only	Y Certification required on contracts greater than \$100,000 only
Lobbying (Appropriation Mandate) 4.2.5	Y	Y	Y
Metric System 4.1.18 and 10.10	Y	Y	Y
Military Recruiting and ROTC Program Access to Institutions of Higher Education 4.1.19	Y	N	N
National Environmental Policy Act of 1969 (including Public	Y	NA	NA

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Disclosure) 4.1.20 and 10.10			
National Historic Preservation Act of 1966 – Archaeological and Historic Preservation Act of 1974 10.10	Y (Construction Grants; any award involving major or minor A&R, or any work resulting in physical changes to real property)	Y	Y
Nondelinquency on Federal Debt 4.1.21	Y	Y	NA
Pro-Children Act of 1994 4.1.22	Y	Y	Y
Promotion or Legalization of Controlled Substances (Appropriation Mandate) 4.2.6	Y	Y	Y
Protection of Wetlands (EO 11990) 10.10	Y (Construction Grants Only)	Y	Y
Public Health Security and Bioterrorism Preparedness and Response Act (Select Agents) 4.1.23	Y	Y	Y
Recombinant DNA Molecules and Human Gene Transfer Research	Y	Y	Y

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4.1.24			
Rehabilitation Act of 1973 (section 504) 4.1.2.3 and 10.10	Y (NA to foreign and international organizations)	Y (NA to foreign and international organizations)	Y (NA to foreign and international organizations)
Reporting and Assurance Requirements for Institutions Receiving Awards for Training of Graduate Students for Doctoral Degrees 4.1.25	Y	Y	NA
Research Misconduct 4.1.26	Y	Y	NA
Restriction on Abortions & Exceptions (Appropriation Mandates) 4.2.7 & 4.2.7.1	Y	Y	Y
Restriction on Distribution of Sterile Needles (Appropriation Mandate) 4.2.8	Y	Y	Y
Salary Limitation/Cap (Appropriation Mandate) 4.2.9	Y	Y	NA
Safe Drinking Water Act 10.10	Y (Construction Grants Only)	Y	Y
Seat Belt Use 4.1.27	Y	NA	NA

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Select Agents (see Public Health Security & Bioterrorism Preparedness and Response Act) 4.1.23.1	Y	Y	Y
Smoke-Free Workplace 4.1.28	Y	NA	NA
Standards of Conduct 4.1.29	Y	NA	NA
Text Messaging While Driving 4.1.30	Y	Y	Y
Trafficking in Persons 4.1.31	Y Private entities	Y Private entities	NA
Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 10.10	Y	NA	NA
U.S. Flag Air Carriers 7.9.1	Y	Y	Y
USA Patriot Act 4.1.32	Y	Y	Y
Wild and Scenic Rivers Act of 1968 10.10	Y (Construction Grants Only)	Y	Y

* NA: A designation of NA in this table indicates that a particular requirement does not apply to an otherwise eligible grantee, consortium participant, or contractor or may not apply because the type of activity covered is one not normally performed by such an entity.

Appendix 2. Allowable and unallowable costs – see “Educational Institutions” column. Refer OMB Circular A-21 or the NIH Grants Policy Statement for further details.

Selected Items of Cost Exhibit 1 (amended 6/04)			
<i>Selected Cost Item</i>	<i>OMB Circular A-87, Attachment B State, Local, & Indian Tribal Gov'ts</i>	<i>OMB Circular A-21, Section J Educational Institutions</i>	<i>OMB Circular A-122, Attachment B Non-Profit Organizations</i>
Advertising and public relations costs	(1) Allowable with restrictions	(1) Allowable with restrictions	(1)-Allowable with restrictions
Advisory councils	(2)-Allowable with restrictions	(2) Allowable with restrictions	(2) Allowable with restrictions
Alcoholic beverages	(3)-Unallowable	(3)-Unallowable	(3)-Unallowable
Alumni/ae activities	Not specifically addressed	(4)-Unallowable	Not specifically addressed
Audit costs and related services	(4)-Allowable with restrictions and as addressed in OMB Circular A-133	(5)-Allowable with restrictions and as addressed in OMB Circular A-133	(4)-Allowable with restrictions and as addressed in OMB Circular A-133
Bad debts	(5)-Unallowable	(6)-Unallowable	(5)-Unallowable
Bonding costs	(6)-Allowable with restrictions	(7) Allowable with restrictions	(6)-Allowable with restrictions
Commencement and convocation costs	Not specifically addressed	(8)-Unallowable with exceptions	Not specifically addressed
Communication costs	(7)-Allowable	(9)-Allowable	(7)-Allowable
Compensation for personal services	(8)-Unique criteria for support	(10)-Unique criteria for support	(8)-Unique criteria for support
Compensation for personal services - organization-furnished automobile	Not specifically addressed	(10.g)- Unallowable for that portion of costs attributed to personal use	(8.g)- Unallowable for that portion of costs attributed to personal use
Compensation for personal services - sabbatical leave	Not specifically addressed	(10.f(4))- Allowable with restrictions	Not specifically addressed

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costs			
Compensation for personal services - severance pay	(8)-Allowable with restrictions	(10.h)-Allowable with restrictions	(8.k)-Allowable with restrictions
Contingency provisions	(9)-Unallowable with exceptions	(11)-Unallowable with exceptions	(9)-Unallowable with exceptions
Deans of faculty and graduate schools	Not addressed	(12)-Allowable	Not addressed
Defense and prosecution of criminal and civil proceedings and claims	(10)-Allowable with restrictions	(13)-Allowable with restrictions (Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringement)	(10)-Allowable with restrictions (Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringement)
Depreciation and use allowances	(11)-Allowable with qualifications	(14)-Allowable with qualifications	(11)-Allowable with qualifications
Donations and contributions	(12)-Unallowable (made by recipient); not reimbursable but value may be used as cost sharing or matching (made to recipient)	(15)-Unallowable (made by recipient); not reimbursable but value may be used as cost sharing or matching (made to recipient)	(12)-Unallowable (made by recipient); not reimbursable but value may be used as cost sharing or matching (made to recipient)
Employee morale, health, and welfare costs	(13)-Allowable with restrictions	(16)-Allowable with restrictions	(13)-Allowable with restrictions
Entertainment costs	(14)-Unallowable	(17)-Unallowable	(14)-Unallowable
Equipment and other capital expenditures	(15)-Allowability based on specific requirements	(18)-Allowability based on specific requirements	(15)-Allowability based on specific requirements
Fines and	(16)-Unallowable with	(19)-Unallowable with	(16)-Unallowable with

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penalties	exception	exception	exception
Fundraising and investment management costs	(17)-Unallowable with exceptions	(20)-Unallowable with exceptions (Fundraising)	(17)-Unallowable with exceptions
Gains and losses on depreciable assets	(18)-Allowable with restrictions (Gains and losses on disposition of depreciable property and other capital assets and substantial relocation of Federal programs)	(21)-Allowable with restrictions	(18)-Allowable with restrictions
General government expenses	(19)-Unallowable with exceptions	Not specifically addressed	Not specifically addressed
Goods or services for personal use	(20) Unallowable	(22)-Unallowable	(19)-Unallowable
Housing and personal living expenses	Not specifically addressed	(23)-Unallowable	(20)-Unallowable as overhead costs
Idle facilities and idle capacity	(21)-Idle facilities - unallowable with exceptions; idle capacity - allowable with restrictions	(24)-Idle facilities - unallowable with exceptions; idle capacity - allowable with restrictions	(21)-Idle facilities - unallowable with exceptions; idle - capacity allowable with restrictions
Insurance and indemnification	(22)-Allowable with restrictions	(25)-Allowable with restrictions	(22)-Allowable with restrictions
Interest	(23)-Allowable with restrictions	(26)-Allowable with restrictions	(23)-Allowable with restrictions
Interest - substantial relocation	Not specifically addressed	(26.b(6))-Possible adjustment in relocated within 20 years	(23.a(6)(d))-Possible adjustment in relocated within 20 years
Labor relations	Not specifically addressed	(27)-Allowable	(24)-Allowable

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costs			
Lobbying	(24)-Unallowable	(28)-Unallowable with exceptions	(25)-Unallowable with exceptions
Lobbying - executive lobbying costs	(24.b)-Unallowable	(28.h)-Unallowable	(25.d)-Unallowable
Losses on other sponsored agreements or contracts	Not specifically addressed	(29)-Unallowable	(26)-Unallowable (Losses on other awards or contracts)
Maintenance and repair costs	(25)-Allowable with restrictions (Maintenance, operations, and repairs)	(30)-Allowable with restrictions	(27)-Allowable with restrictions
Materials and supplies costs	(26)-Allowable with restrictions	(31)-Allowable with restrictions	(28)-Allowable with restrictions
Meetings and conferences	(27)- Allowable with restrictions	(32)- Allowable with restrictions	(29)-Allowable with restrictions
Memberships, subscriptions, and professional activity costs	(28)-Allowable as a direct cost for civic, community and social organizations with Federal approval; unallowable for lobbying organizations.	(33)-Unallowable for civic, community, or social organizations	(30)-Allowable for civic and community organizations with Federal approval; unallowable for social organizations.
Organization costs	Not specifically addressed	Not specifically addressed	(31)-Unallowable except Federal prior approval
Page charges in professional journals	(34.b)-Allowable with restrictions (addressed under "Publication and printing costs")	(39.b)-Allowable with restrictions (addressed under "Publication and printing costs")	(32)-Allowable with restrictions
Participant support costs	Not specifically addressed	Not specifically addressed	(33)-Allowable with prior approval of the Federal awarding

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			agency
Patent costs	(29)-Allowable with restrictions	(34)-Allowable with restrictions	(34)-Allowable with restrictions
Plant and homeland security costs	(30)-Allowable with restrictions	(35)-Allowable with restrictions	(35)-Allowable with restrictions
Pre-agreement costs	(31)-Allowable with restrictions (Pre-award costs)	(36)-Unallowable unless approved by the Federal sponsoring agency	(36)-Allowable with restrictions
Professional service costs	(32)-Allowable with restrictions	(37)-Allowable with restrictions	(37)-Allowable with restrictions
Proposal costs	(33)-Allowable with restrictions	(38)-Allowable with restrictions	Not specifically addressed
Publication and printing costs	(34)-Allowable with restrictions	(39)-Allowable with restrictions	(38)-Allowable with restrictions
Rearrangement and alteration costs	(35)-Allowable (ordinary and normal); allowable with Federal prior approval (special)	(40)-Allowable (ordinary and normal); allowable with Federal prior approval (special)	(39)-Allowable (ordinary and normal); allowable with Federal prior approval (special)
Reconversion costs	(36)-Allowable with restrictions	(41)-Allowable with restrictions	(40)-Allowable with restrictions
Recruiting costs	(1.c)-Allowable with restrictions (addresses costs of advertising only)	(42)-Allowable with restrictions	(1)-Allowable with restrictions
Relocation costs	Not specifically addressed	(42.d)-Allowable with restrictions	(42)-Allowable with restrictions
Rental cost of buildings and equipment	(37)-Allowable with restrictions	(43)-Allowable with restrictions	(43)-Allowable with restrictions
Royalties and other costs for use of patents	(38)-Allowable with restrictions	(44)-Allowable with restrictions	(44)-Allowable with restrictions
Scholarships and	Not specifically addressed	(45)-Allowable with	Not specifically

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student aid costs		restrictions	addressed
Selling and marketing costs	(39)-Unallowable with exceptions	(46)-Unallowable with exceptions	(45)-Unallowable with exceptions
Specialized service facilities	Not specifically addressed	(47)-Allowable with restrictions	(46)-Allowable with restrictions
Student activity costs	Not specifically addressed	(48)-Unallowable unless specifically provided for in the sponsored agreement	Not specifically addressed
Taxes	(40)-Allowable with restrictions	(49)-Allowable with restrictions	(47)-Allowable with restrictions
Termination costs applicable to sponsored agreements	(41)-Allowable with restrictions	(50)-Allowable with restrictions	(48)-Allowable with restrictions
Training costs	(42)-Allowable for employee development	(51)-Allowable for employee development	(49)-Allowable with limitations
Transportation costs	Not specifically addressed	(52)-Allowable with restrictions	(50)-Allowable
Travel costs	(43)-Allowable with restrictions	(53)-Allowable with restrictions	(51)-Allowable with restrictions
Trustees	Not specifically addressed	(54)-Allowable with restrictions	(52)-Allowable with restrictions