Q. The definition of what qualifies for “off-campus” in our rate agreement is not helpful to me. What is the most important take-away from that definition?

A. The most important element of the definition is the requirement for the direct cost for facilities to be included in the proposal or award or otherwise clearly provided by the Sponsor. It makes sense that if a UNM researcher typically has UNM facilities made available to them for some or all of the research or other project, the proposal or award needs to document those facilities that will be used in lieu of UNM facilities to qualify for the off-campus rate.

Q. Does my project qualify for an off-campus rate if 100% of the data collection or fieldwork is performed off-campus?

A. No, not based on the fieldwork alone. The off-campus rate is used when facilities are provided to conduct the project in lieu of UNM facilities and more than 50% of the project is performed off-campus. The entire life cycle of a project is considered, such as project planning, research planning, staffing, organizing, data collection, analysis, reporting, publication, and other sponsor requirements.

Q. Why is it so tough to use the off-campus rate?

A. Using the off-campus rate says you do not need the facilities or systems provided by UNM to conduct your project or the Sponsor wants the program performed elsewhere. If that is the way the project is proposed or planned, it makes sense to include the costs for the alternate facility or have the Sponsor agree to provide a place to conduct the project.

Q. Shouldn’t we use the lowest rate we can and that is usually the off-campus rate?

A. It’s appropriate to use an off-campus rate when the project meets the off-campus criteria. Otherwise, UNM is not following our rate agreement negotiated with the cognizant federal officials. Our use of rates and project costs are subject to federal audit and that audit occurs on a regular basis. We are also specifically prohibited from effectively subsidizing private companies and other non-US or non-federal entities by charging them an off-campus rate without adequate attention to fairly and consistently applying the off-campus rate definition.

Q. What happens if a Sponsor does not want to fund an on-campus rate?

A. The correct application and use of on-off campus rates (and our F&A rates in general) are governed by federal regulations (2 CFR 200) which directs all federal agencies to accept the
Q. What does the Office of Sponsored Projects need to determine if an off-campus rate will apply?

A. Generally, OSP needs several of the documents that will be submitted for a proposal review and submittal (the solicitation, the proposal, the budget, and the budget justification). Generating additional documents is not usually needed. We look first at the solicitation to see if the Sponsor anticipates a direct charge for facilities or offers to provide facilities as part of the award to conduct and manage the project. If the Sponsor anticipates or encourages those alternate facilities, we look at how the costs, staffing, or other arrangements in the budget and budget justification support the use of off-campus facilities. Please note: OSP needs to review documents for an off-campus rate at least three business days prior to the 5-days for proposal submission.