

# Memberships, Subscriptions, & Professional Activities Costs Guidance

# I. PURPOSE

To provide reasonable assurance that costs for memberships, subscriptions and professional activities (either Institutional or Individual) are being charged in a consistent manner and in compliance with the U.S. Office of Management and Budgets Uniform Guidance <u>2 CFR Part 200.454</u>. This guidance applies to all sponsored projects, regardless of whether the project is federally funded or not.

# **II. DEFINITIONS**

<u>Memberships</u>: Memberships are fees or dues paid for an individual or an institution to join a technical, business, or professional organization for a specific length of time. Individual memberships are associated with, and provide benefits to, a single person only. Institutional memberships are associated with, and provide benefits to, an entire non-federal entity.

<u>Subscriptions</u>: Subscriptions are payments in exchange for receiving technical, business, or professional periodicals or access to information (ex. inter-library searches or national DNA database).

<u>Professional Activities</u>: Professional activities are intended to enhance an individual's professional development, including obtaining skills and qualifications needed to progress in one's career.

# III. PROCEDURES

## Memberships

Memberships that are required for attendance at professional technical conferences can be directly charged to federal sponsors when the costs have been specifically budgeted for and justified in the grant proposal, or have prior written approval from the sponsor before the incurrence of such costs, and not specifically disallowed by the granting agency. Because they are of a general benefit to research and academic endeavors and cannot be specifically assigned to benefit individual awards, memberships are normally considered indirect costs. Thus, the costs would need to be carefully justified, and the membership must directly benefit the objectives of the award.

#### Institutional

Under the guidelines imposed by the OMB's Uniform Guidance (<u>2 CFR 200.454</u>), costs for institutional memberships in business, technical, and professional organizations and institutional subscriptions to business, technical, and professional periodicals are allowable. These costs must have prior approval, either through the grant proposal, or written communication from the sponsor.

## Individual

Individual memberships are treated as indirect costs per OMB Uniform Guidance (<u>2 CFR 200 Appendix</u> <u>III.B.6.b.(2)</u>). The exception for individual memberships is when UCCS receives an award with an institutional allowance, and the federal agency specifically allows direct charging of individual dues, memberships, or subscriptions. In these cases, memberships, subscriptions, and professional activity costs may be charged directly to a sponsored project. Examples of these types of awards include NIH or NASA fellowships, training projects, or any other type of award with an institutional allowance. The membership,



subscription, or professional activity cost must directly benefit the fellow or participant. Allowable costs for individual memberships are typically specifically outlined within the award.

#### **Subscriptions**

Subscriptions will normally not be allowed as a direct charge to a federal research grant because their content is more general in nature and cannot usually be identified with a high degree of specificity to an individual research project. Under certain circumstances, a PI may be able to provide justification supporting a subscription to be charged to a federal grant, specifically that the cost can be associated with the sponsored project with a high degree of accuracy, and the awarding agency has approved charging the cost as a direct cost in the awarded budget.

## **Professional Activities**

Federal grant guidelines typically restrict direct charging professional activity costs because they benefit the individual's broader career rather than a specific research project. If the cost of the professional activity is directly and demonstrably linked to the project's objectives and is essential for the project's success, it may be allowable. This requires clear documentation and justification in the budget. These costs must be itemized in the budget and described in the budget justification, or receive prior written approval from the sponsor before the incurrence of such costs

# IV. RESOURCES

Uniform Guidance 2 CFR Part 200.454

Uniform Guidance 2 CFR Part 200.403

Uniform Guidance 2 CFR 200 Appendix III.B.6.b.(2)