Lamoille North Supervisory Union Allowability of Cost Procedure for Goods or Services

Obligation of Federal Funds requires the SU/SD to determine the allowability of costs in accordance with Subpart E cost principals (2 CFR §200.400) and the terms and conditions of the award; definitions on page 2. Costs must be reasonable, necessary, and allocable. Treatment of direct and indirect costs must be consistent with the LEA's approved Indirect Cost Agreement. Costs must meet the conditions of the "Selected Items of Cost" (2 CFR §200.420-§200.476)

Task	Title of Responsible	Stage of Procurement
	Party	(Requisition, PO,
		Contract, Invoice)
Determines the cost is reasonable	Administrator	Requisition
Determines the cost is necessary	Administrator	Requisition
Determines the cost is included in the	Administrator	Requisition
approved grant award (budget)		
Determines the cost is obligable	Administrator	Requisition
within the grant period		
Determines the cost is allocable	Administrator	Requisition
Determines the cost is correctly	Business Manager or	Requisition
treated as a direct or indirect cost	Finance Coordinator	
Determines the cost is not excluded as	Administrator,	Requisition
a Selected Item of Cost (ex. sales tax,	Business Manager	
entertainment are excluded)	and/or Finance	
	Coordinator	
Verifies the cost is covered by a	Business Manager or	Requisition
contract and that Federal Procurement	Finance Coordinator	Contract
Procedures and / Prevention of		
Conflict of Interest in Procurement		
have been followed		
Checks or verifies suspension and	Business Manager or	Requisition
debarment has been completed	Finance Coordinator	
https://sam.gov/SAM/		
Verifies adequate documentation is on	Administrator,	Invoice
file to support the invoice (ex. packing	Business Manager	
slip for supplies, proof of attendance	and/or Finance	
for conferences)	Coordinator	
Verifies contract administration	Business Manager or	Invoice
procedures have been followed	Finance Coordinator	

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Definitions

Reasonable: 2 CFR §200.404

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost....

Necessary: 2 CFR §200.404(a)

A cost is necessary if it is essential for the proper and efficient performance of the Federal award.

Allocable: 2 CFR §200.405

A cost is allocable if it is allowed in a grant investment. If a cost benefits more than one project or activity the cost must be allocated to the projects based on the proportional benefit. If the proportional benefit cannot be determined without undue effort or cost, then the costs may be allocated on any reasonable documented basis.

Consistent Treatment of Direct and Indirect Costs: 2 CFR §200.400(d)-(e)

A cost must be consistently treated as either a direct or indirect cost. In addition, a cost must be subject to the same policies and procedures that apply uniformly to both federal and non-federal activities.

Obligable: <u>34 CFR §76.707</u> <u>34 CFR §76.708</u>

A cost is obligable if the date of obligation per the chart below falls within the period of performance. Period of performance is defined on the grant award notification.

If the obligation is for -	The obligation is made -	
(a) Acquisition of real or personal property	On the date on which the State or subgrantee makes a	
(a) requisition of real of personal property	binding written commitment to acquire the property.	
(b) Personal services by an employee of the State or	When the services are performed.	
subgrantee		
(c) Personal services by a contractor who is not an	On the date on which the State or subgrantee makes a	
employee of the State or subgrantee	binding written commitment to obtain the services.	
(d) Performance of work other than personal	On the date on which the State or subgrantee makes a	
services	binding written commitment to obtain the work.	
(e) Public utility services	When the State or subgrantee receives the services.	
(f) Travel	When the travel is taken.	
(g) Rental of real or personal property	When the State or subgrantee uses the property.	
(h) A pre-agreement cost that was properly	On the first day of the grant or subgrant performance period.	
approved by the Secretary under the cost principles		
in 2 CFR part 200, Subpart E - Cost Principles		

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Always go to the full link to determine if the brief description has been updated or changed.