

New York University

UNIVERSITY POLICIES

Title:	Memberships, Subscriptions and Professional Activity Costs Policy for Federally Sponsored Programs
Effective Date:	December 1, 2017
Supersedes:	September 1, 2013
Issuing Authority:	Sponsored Programs Administration
Responsible Officer:	Assistant Vice President for Post-Award Administration

Policy

It is the policy of New York University (NYU, “the University”) that generally membership dues, subscriptions and professional activity costs may not be charged directly to Federally sponsored projects or as cost sharing unless noted by the sponsor; these costs are normally paid through NYU’s Facilities & Administrative (F&A) cost rate.

Purpose of this Policy

The purpose of this policy is to provide guidance for charging membership dues, subscriptions and professional activity costs in accordance with Federal regulations, OMB Uniform Guidance, section 200.454.

Scope of this Policy

This policy is applicable to all schools, departments, units and personnel of the University involved in administering sponsored awards.

Procedures for Implementation

Payments for individual and institutional membership dues and subscriptions generally should be charged to unrestricted accounts (non-sponsored projects such as discretionary chartfield incentive accounts, startup funds and endowments). If these accounts are not available, researchers should contact the Dean’s office for alternative funding to support these types of costs.

The cost of individual memberships or subscriptions is allowable when fully justified in sponsored-approved grant applications and contract proposals. The circumstances under which such costs may be allowable include, but are not limited to:

- Required for attendance at conference;
- Required for participation as guest speaker at a conference or symposium;
- Required to distribute technical information or to publish research results.

Policy Definitions

Award	Funds provided to the University by a Sponsor for an activity with a defined scope and purpose and with the expectation of an outcome that directly benefits the Sponsor. Awards may be established in such forms as a grant, contract or cooperative agreement.
Sponsor	An individual, institution or agency that enters into an agreement with the University to support through an award (grant, contract, or cooperative agreement) a project or work of a certain scope.
Sponsored Projects	Signed awards (grant, contract, or cooperative agreement) under which the University agrees to perform a certain scope of work for an external sponsor.
Subcontract	A written agreement between the University and a third party, often issued under a sponsored project, to procure goods or services. The term may refer either to an agreement with a subrecipient or with a vendor.

Related Policies

- Charging Administrative Expenses to Federal Awards Policy
<http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/charging-administrative-expenses-to-federal-awards-policy.html>
- Costing Policy
<http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/costing-policy.html>

Federal Regulations

- OMB Uniform Guidance
http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl