

USDA APHIS Veterinary Services
National Animal Disease Preparedness and Response Program
and National Animal Health Laboratory Network
Cooperative and Interagency Agreements
Guidelines for Use of Funds

This guidance describes costs allowed or unallowed for reimbursement through an APHIS Veterinary Services (VS) Cooperative or Interagency Agreement funded via Farm Bill Section 12101 resources in the National Animal Disease Preparedness and Response Program (NADPRP) and the National Animal Health Laboratory Network (NAHLN). Additional program-specific cost guidance may be included in the NADPRP or NAHLN Funding Opportunity Announcements.

The Office of Management and Budget (OMB) cost principles ([2 CFR Subpart E](#)) must be used to determine whether a cost can be charged to the project and, if so, the extent to which it can be charged. A review of the detailed Financial Plan will focus on reasonable requests for expenses that support the accomplishment of Work Plan goals and objectives.

ALLOWABLE COSTS

Allowable costs must be reasonable, allocable, and necessary for project completion.

When identifying the resources needed, the Applicant must be in compliance with Federal and State policy and should include the following details.

1. **Personnel:** VS will allow costs for salary and wages for personnel who are essential to complete the activities described in the Work Plan. The total compensation per individual employee must be reasonable for the work performed, conform to the established policy of the organization, and be consistently applied to Government and nongovernmental activities. Applicants must:
 - List all personnel needed to accomplish the project, including position titles, number of hours, hourly rate (or percentage of staff year), and the total number needed for each employee position
 - Identify employee's appointment type, e.g.; full-time, temporary, or part-time workers.
 - Explain how employee compensation was calculated.
 - Identify any compensation increases projected during the award period.
2. **Fringe Benefits:** List the benefits rate.
 - Benefits may include health and life insurance, unemployment insurance, workers' compensation, retirement, social security, and pensions, etc.
 - Identify benefits included in the wages or salaries (e.g., vacation and sick leave).
3. **Outreach Materials:** Program funds may be used for outreach materials, as needed to complete approved projects that support the program priorities. This may include developing, distributing, and delivering educational materials or content such as training curricula, videos, websites, pamphlets, fliers, fact sheets, and other print and media. An applicant who receives funding for a project that includes the

production, purchase, or distribution of materials is not obligated to put the USDA logo on the materials they produce or purchase under a cooperative agreement. However, APHIS has the option of reviewing all materials to be produced or purchased and may request that the USDA name and logo appear on those items if we determine it is in our collective best interest. Refer to the [General Terms and Conditions for APHIS Cooperative Agreements Grants](#), Publications and Audiovisuals article for additional information.

4. **Equipment:** The Federal definition of equipment is tangible personal property (including information technology systems) having a useful life of more than 1 year and a unit value of \$5,000 or more; unless the Recipient definition of equipment is more restrictive. Provide a description of the equipment to be purchased or leased, including unit cost, and total purchase or leasing costs. The purpose of each equipment item and how it will benefit or be used for the project must be provided in the project proposal and subsequent Work Plan.
5. **Information Technology:** Work Plans that include a cumulative request for Information Technology of \$25,000 or more require additional USDA IT review. Information Technology is any equipment, interconnected system(s), or subsystem(s) of equipment that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by an Agency. The term “information technology” includes, but is not limited to, computers, network and ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources. Refer to [2 CFR Part 200.58](#) for additional information.
6. **Travel:** Funds may be requested for field work, training, attendance of meetings and conferences, and other travel costs (excluding international travel) associated with the proposed work. Recipients should follow their State written travel policies when calculating travel costs. If there is no State travel policy, Federal per diem rates should be used. Federal per diem rates can be found on [GSA](#). Reference [2 CFR Part 200.474](#).
 - **Local travel:** Identify any local travel to project work sites as outlined in proposed activities. Indicate, by position type, who will be traveling, total projected mileage, and rate per mile. Include number of days and per diem rates for extended or overnight travel. Indicate the number of trips per day/week/month, as appropriate.
 - **Out of State travel:** Identify the number of travelers, meeting/conference/training title, and destination. Provide the cost of transportation, lodging, subsistence and related items, number of days, rate per day, and the total. Registration fees should be included in the “Other” category.
7. **Supplies:** Provide a general description of the supplies required to perform the proposed activities. Provide an itemized breakdown of the types of supplies and total estimated cost per type, when the cumulative value of supplies exceeds \$5,000.
8. **Contractual:** Applicants must describe, in the narrative of the Work Plan, how the sub-award/contract will be accomplished. Applicants should include the total “contract” cost, by contractor or sub-awardee, in the project budget. Provide a separate budget with cost breakdowns for each contractor or sub-awardee, for all applicable cost categories and totals. Make sure to describe in the narrative of

the work plan how the sub-award/contract will be accomplished: competitive or sole source. Sole source requires a justification with the package.

Consulting contract applicants must include: 1) name(s) of consultant(s) to be engaged; 2) daily fees to be paid to each consultant; 3) number of estimated days of continuing services; 4) scope of work to be performed (deliverables); 5) other incidental data supporting the proposed costs; and 6) a description of how the consultant(s) will be selected: competitive or sole source (sole source requires a justification with the package).

9. **Other:** Identify any direct costs which were not itemized elsewhere, such as conference registration fees, communications, printing, publication charges, computer time or usage, Recipient laboratory testing, etc.

VS' total share of the project must be a whole dollar amount, no cents.

UNALLOWABLE COSTS

The items below are costs that **will not be funded** through NADPRP and NAHLN Cooperative Agreements:

- Construction of a new building or facility, or the acquisition or expansion of an existing building or facility, including site grading, improvement, and architect fees.
- Land acquisition.
- Projects or activities associated with VS-State-industry cooperative programs that are typically supported through appropriated funds, including activities typically funded via APHIS VS annual umbrella agreements, and Animal Disease Traceability agreements. NADPRP and NAHLN funds may be used to build on preparedness and response activities associated with other VS cooperative programs.
- International travel.
- Promotional or thank-you materials, incentives to encourage participation, or similar costs unallowable by OMB cost principles ([2 CFR Subpart E – Cost Principles General Provisions for Selected Items of Cost](#)).
- Food and beverage for meetings, trainings, or workshops.
- Bonuses or commissions.
- Fundraising.
- Meeting, conference, symposia, or workshop honoraria which is payment to individuals or guests other than for documented professional services.

COST SHARING AND MATCHING

Cost sharing and matching, defined in [2 CFR Part 200.29](#), is “the portion of the project costs not paid by Federal funds (unless otherwise authorized by Federal statute).” There is no required cost share/match for NADPRP or NAHLN cooperative agreements. If a recipient includes cost share in their budget proposal and it is accepted by APHIS VS, the commitment of funds becomes legally binding, must be reported on the SF-425, and is subject to audit.

If the recipient does not meet its cost-share ratio or cost-match requirement as stipulated in the cooperative agreement, action can be taken to (1) reduce the next cooperative agreement, (2) reduce VS' share proportionately, or (3) allow the reduced cost share when it is in the best interest of the Federal Government. After the cooperative agreement has expired, adjustments to a cost share cannot be approved. Refer to [2 CFR Part 200.306](#) for additional information.

SUB-AGREEMENT/SUB-AWARD

The 2018 Farm Bill provides guidance on sub-agreements: “Nothing in this section prevents an eligible entity from using funds received under the Program to enter into sub-agreements with another eligible entity or with a political subdivision of a State that has legal responsibilities relating to animal disease prevention, surveillance, or rapid response.”

Sub-agreements are equivalent to sub-awards, which are defined as an award provided by the applicant to a sub-recipient who will be performing tasks or providing deliverables that adhere to the work as identified in the applicants Work Plan. If an applicant desires to use a sub-award, the sub-recipient selected must undergo risk assessment reviews as detailed in [2CFR Part 200.205](#) in order to receive the sub-award.

INDIRECT COSTS

Applicants may charge their negotiated indirect cost rate or 10 percent of the total direct costs, whichever is lower. Eligible cooperator’s assessment of indirect costs are limited to not more than 10% of total direct costs or the application of their indirect cost rate agreement, whichever is less. The applicant must submit a copy of its fully executed current Negotiated Indirect Cost Rate Agreement, negotiated by its recognized Federal Agency ([2 CFR Part 200.19](#)), when indirect costs are assessed in the budget.

Indirect cost rates exceeding 10 percent are not allowed. Eligible entities must notify sub-applicants of the limit on indirect costs, in its request for proposals/applications, so that indirect costs requested by sub-applicants plus indirect administration costs requested by the eligible entity do not exceed 10 percent of the total request for Federal funds.

The below example illustrates the proper application of the indirect cost rate, considering the statutory cap.

Example:

Kansas State University (KSU) Cooperative Agreement with total direct costs of \$100,000. KSU has an indirect cost rate of 15% and the base for application is exclusively salaries and wages. KSU’s SF-424A states that \$50,000 will be spent on salaries and wages. The remaining \$50,000 is for travel, supplies, and training.

In this case, if the 10% statutory cap was applied, the indirect costs would be $10\% \times \$100,000 = \$10,000$. If their 15% rate was applied to the base of \$50,000 (salaries and wages), the indirect costs would be $15\% \times \$50,000 = \$7,500$. In this scenario, KSU’s rate would apply since it is less than the statutory cap.

Indirect costs are negotiated by the recipient and their cognizant agency ([2 CFR Part 200.19](#)). The cognizant agency is the Federal agency that provides the most Federal funds to the recipient. The result of this negotiation is a Negotiated Indirect Cost Rate Agreement (NICRA). A signed NICRA is required to be attached to the Application in ezFedGrants if indirect costs are assessed.

Recipients that have never had a NICRA and receive less than \$35 million in direct Federal funding each year can apply for a de minimis rate of 10 percent of modified total direct costs pursuant to [2 CFR Part 200.414 \(f\)](#). Recipients interested in a de minimis rate should reach out to an APHIS VS Grants Specialist.

DEFINITIONS

The [2 CFR Part 200, Subpart A](#) includes a comprehensive list of definitions. Below are some common definitions along with definitions for terms that are not listed in the [2 CFR Part 200, Subpart A](#).

- 1. Allowable costs:** costs that are reasonable, allocable, and necessary to the project and comply with funding statute requirements.
- 2. Contract (2 CFR Part 200.22):** *Contract* means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or sub-award (see §200.92 Sub-award).
- 3. Cooperative agreement (2 CFR Part 200.24):** a legal instrument of financial assistance between a Federal awarding agency or pass-through entity and a non-Federal entity when substantial involvement is anticipated.
- 4. Cost sharing or cost matching (2 CFR Part 200.29):** the portion of project costs not paid by Federal funds (unless otherwise authorized by Federal statute). **Cost sharing** refers to the portion of project *not* borne by the Federal Government, i.e., a recipient's participation on the total cost of the project. For example, if the Recipient "cost-sharing" is 33 ¼ percent, then the Federal share is 66 ¾ percent of the recipient's total project costs. **Cost matching** refers to the portion of the project *not* borne by the Federal Government, and it directly compares Federal and non-Federal participation dollar for dollar. For example – a 50 percent match of Federal funds means that the recipient must provide 50 cents for every Federal dollar. A 100 percent match means one recipient dollar (or dollar value) for every Federal dollar.
- 5. Disallowed costs (2 CFR Part 200.31):** those charges to a Federal award that the Federal awarding agency or pass-through entity determines to be unallowable, in accordance with the applicable Federal statutes, regulations, or the terms and conditions of the Federal award.
- 6. Equipment (2 CFR Part 200.33):** tangible personal property (including information technology systems) having a useful life of more than 1 year and a per unit value of \$5,000 or more.
- 7. Grant (2 CFR Part 200.51):** a legal instrument of financial assistance between a Federal awarding agency or pass-through entity and a non-Federal entity which does not provide for substantial involvement.
- 8. Indirect (facilities & administrative (F&A)) costs (2 CFR Part 200.56):** costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.
- 9. Information technology systems (2 CFR Part 200.58):** computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources.
- 10. Non-Federal entity (2 CFR Part 200.69):** a State, local government, Indian tribe, institution of higher education (IHE), or nonprofit organization that carries out a Federal award as a recipient or sub-recipient.

11. **Pass-through Entity** (2CFR Part 200.74): a non-Federal entity that provides a sub-award to a sub-recipient to carry out part of a Federal program.
12. **Recipient** (2 CFR Part 200.86): a non-Federal entity that receives a Federal award directly from a Federal awarding agency to carry out an activity under a Federal program.
13. **Restricted costs**: a mixture of allowable and unallowable costs and/or requires agency approval.
14. **Sub-award** (2 CFR Part 200.92): an award provided by a pass-through entity to a sub-recipient for the sub-recipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A sub-award may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.
15. **Sub-Recipient** (2 CFR Part 200.93): a non-Federal entity that receives a sub-award from a pass-through entity to carry out part of a Federal program.
16. **Substantial involvement**: when the Federal awarding agency provides collaboration, participation, or intervention. The Federal awarding agency is substantially involved when it acts as a partner with the Recipient.
17. **Unliquidated obligations** (2 CFR 200.97): on a cash basis, unliquidated obligations are obligations incurred but not yet paid. On an accrual basis, they are obligations incurred but for which an expenditure has not yet been recorded.
18. **Unobligated balance** (2 CFR Part 200.98): the amount of funding that has been authorized on a Federal award but remains uncommitted by the Recipient.

COMMON COST TYPES

2 CFR – Subpart E – Cost Principles General Provisions for Selected Items of Cost

Type of Cost	2 CFR Part	Classification of Costs
Advertising and public relations costs	200.421	Restricted – refer to CFR
Advisory councils	200.422	Unallowable – unless authorized by statute, the Federal agency, or as an indirect cost where allocable to Federal awards
Alcoholic beverages	200.423	Unallowable
Alumni/ae activities	200.424	Unallowable
Audit services	200.425	Restricted – refer to CFR
Bad debts	200.426	Unallowable
Bonding costs	200.427	Restricted – refer to CFR
Collections of improper payments	200.428	Refer to CFR
Commencement and convocation costs	200.429	Unallowable except as provided for in Appendix III to Part 200- Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Institutions of Higher Education, paragraph (B)(9) Student Administration and Services, as student activity costs
Compensation - fringe benefits	200.431	Allowable – provided that the benefits are reasonable and are required by law, non-Federal entity-employment agreement or an established policy of the non-Federal entity
Compensation - personal services	200.430	Refer to CFR
Conferences	200.432	Refer to CFR
Contingency Provisions	200.433	Restricted – refer to CFR
Contributions and donations	200.434	Unallowable
Defense and prosecution of criminal and civil proceedings, claims, appeals, and patent infringements.	200.435	Restricted – refer to CFR
Depreciation	200.436	Restricted – refer to CFR
Employee health and welfare costs	200.437	Refer to CFR
Entertainment costs	200.438	Unallowable
Equipment and other capital expenditures	200.439	Restricted –refer to CFR
Exchange rates	200.440	Allowable – prior approval of agency required – refer to CFR
Fines, penalties, damages, and other settlements	200.441	Unallowable – prior approval of agency required – refer to CFR
Fund raising and investment management costs	200.442	Restricted – refer to CFR
Gains and losses on disposition of depreciable assets	200.443	Restricted – refer to CFR
General costs of government	200.444	Unallowable
Goods or services for personal use	200.445	Restricted – refer to CFR
Idle facilities and idle capacity	200.446	Restricted – refer to CFR
Insurance and indemnification	200.447	Restricted – prior approval of agency required – refer to CFR
Intellectual property	200.448	Restricted – refer to CFR
Interest	200.449	Restricted – refer to CFR
Lobbying	200.450	Unallowable – refer to CFR

Losses on other awards or contracts	200.451	Unallowable
Maintenance and repair costs	200.452	Allowable
Materials and supplies costs, including costs of computing devices	200.453	Allowable
Memberships, subscriptions, and professional activity costs	200.454	Restricted – refer to CFR
Organization costs	200.455	Unallowable – prior approval of agency required – refer to CFR
Participant support costs	200.456	Allowable – prior approval of agency required – refer to CFR
Plant and security costs	200.457	Allowable
Pre-award costs	200.458	Restricted – refer to CFR
Professional service costs	200.459	Restricted – refer to CFR
Proposal costs	200.460	Restricted – refer to CFR
Publication and printing costs	200.461	Refer to CFR
Rearrangement and reconversion costs	200.462	Allowable
Recruiting costs	200.463	Refer to CFR
Relocation costs of employees	200.464	Restricted – refer to CFR
Rental costs of real property and equipment	200.465	Allowable – refer to CFR
Scholarships and student aid costs	200.466	Restricted – prior approval of agency required – refer to CFR
Selling and marketing costs	200.467	Unallowable – prior approval of agency required – refer to CFR
Specialized service facilities	200.468	Allowable – refer to CFR
Student activity costs	200.469	Unallowable
Taxes (including Value Added Tax)	200.470	Restricted – refer to CFR
Termination costs	200.471	Restricted – refer to CFR
Training and education costs	200.472	Allowable
Transportation costs	200.473	Allowable
Travel costs	200.474	Refer to CFR
Trustees	200.475	Refer to CFR