

This Quick Guide is intended as a resource to: i) help ensure the proper application of UCI’s Internal Controls, ii) appropriately manage the budgeting and charging of food related expenses to federal awards in accordance with the Uniform Guidance, and iii) promote a suitable balance between UCI’s stewardship responsibilities and facilitating its research enterprise.

BACKGROUND

The Uniform Guidance (UG), officially entitled [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#) (2 CFR 200) was issued by the Office of Management and Budget (OMB) in the Executive Office of the President of the U.S. on December 26, 2014 and took effect the same day. This federal regulation synthesizes and replaces the administrative, accounting, audit rules and principles promulgated in eight OMB Circulars, including A-21, A-110, and A-133, and governs the administration of federal awards at all institutions of higher education, including the University of California. In issuing the UG, OMB clarified - and in some instances strengthened - federal regulations relating to allowable expenses. **UCI is required to comply with the UG, including ensuring that all expenses charged to federal awards conform to the cost principles contained in the UG. It is important to note that the allowability of a cost is solely determined by the UG or the federal agency’s policy (which must also comply with the UG). Consequently, such determinations cannot be overridden by UCI’s certification and/or approval that an expense is otherwise allowable.**

GUIDANCE

<p>FOOD Expenses Applicable UG Section: 200.412, 200.413 & 200-420</p> <p>UC Policy: <u>BUS-79</u></p> <p>UCI Guidance: <u>Sec. 701-20</u></p>	<p>Any food-related expense (including meals, snacks, light refreshments, etc.) charged to a federal award must satisfy BOTH criteria below:</p> <ol style="list-style-type: none"> 1. Fit into one of the five UG direct cost categories or one of the two other circumstances listed below: <ol style="list-style-type: none"> a. DIRECT COST CATEGORIES: <ol style="list-style-type: none"> i. Participant Support ii. Travel iii. Entertainment iv. Lobbying v. Conference b. OTHER CIRCUMSTANCES: If a cost doesn’t fit into one of the above five direct cost categories the food-related expense must: <ol style="list-style-type: none"> i. Be fundamental to the project and crucial, necessary and indispensable for carrying out the scope of work, or ii. Be specifically approved in writing by the federal sponsor in response to a written prior approval request that was reviewed, approved and submitted to the federal sponsor by Sponsored Projects Administration (SPA). 2. Be allowable under: i) the UG, ii) the award terms and conditions, iii) sponsor policy, <u>and</u> iv) any related UC/UCI policies. <p>UC/UCI POLICY - DETERMINATION OF ALLOWABILITY & APROPRIATE DIRECT COST CATEGORY</p> <p>STEP 1: Determine if the food-related expense qualifies as a legitimate UCI business expense (i.e. appropriate and necessary to carry out UCI business).</p> <ul style="list-style-type: none"> • If not, STOP. The food-related expense is not allowable and must be borne personally by the individual who incurred the expense. • If YES, go to Step 2 <p>STEP 2: Is the UCI business activity essential to accomplish the scope of work supported by the federal award?</p> <ul style="list-style-type: none"> • If No, DO NOT charge this expense to the federal award, instead charge it to an unrestricted fund source in accordance with BUS-79. • If YES, are the expenses allowable, allocable and reasonable in accordance with the UG, other governing regulations / policies for the grant as well as the Sponsor specific policies applicable to the grant? <ul style="list-style-type: none"> ○ If No, DO NOT charge this expense to the federal award, instead charge it to an unrestricted fund source in accordance with BUS-79. ○ If Yes, charge the expense to the federal award.
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SPECIFIC DETAILED CLARIFICATION TO AID IN DETERMINING APPROPRIATENESS OF MEAL EXPENSES TO A FEDERAL FUND

<p>As part of PARTICIPANT SUPPORT</p> <p>Applicable UG Section: 200.75, 200.456</p>	<p>Food-related expenses associated with Participant Support costs <u>are allowable only if</u> the project includes an education or outreach component, <u>and</u> the food-related expenses are explicitly listed in the proposal budget and justified as part of the education or outreach components.</p> <p>Participant support costs are defined as direct costs for items such as stipends or subsistence allowances, travel allowances and registration fees paid to, or on behalf of, participants or trainees - but not UCI employees - in connection with conferences or training projects.</p>
<p>As part of TRAVEL</p> <p>Applicable UG Section: 200.474, 200.475, 200.456</p> <p>UC Policy: BFB G-28</p> <p>UCI Policy: Sec. 715-01</p>	<p>Food-related expenses incurred by UCI employees while on travel status are allowable provided that such expenses are reasonable and necessary for carrying out the scope of work or are specifically tied to the award’s programmatic requirements.</p> <p>UC/UCI POLICY NOTES:</p> <ol style="list-style-type: none"> 1. Policy defines travel as an overnight stay (or longer) for the purpose of determining whether food-related expenses are allowable. 2. Food-related expenses incurred by a UCI traveler for a non-UCI traveler is not reimbursable to the UCI traveler, regardless of whether the expense is allowable or not. 3. Food expenses related to “meetings while on travel status” are not allowable unless the “meeting” satisfies the definition of a meeting (see Conference/Meeting below).
<p>As part of ENTERTAINMENT</p> <p>Applicable UG Section: 200.438</p>	<p>Food-related expenses associated with the cost of entertainment are always unallowable except in the very rare instance of when food-related costs that might otherwise be considered entertainment have a programmatic purpose <u>AND</u> are authorized either in the budget or approved by the federal sponsor.</p> <p>Entertainment expenses are costs related to amusement, diversion, and social activities and any costs directly associated with such costs, including tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities.</p>
<p>As part of LOBBYING</p> <p>Applicable UG Section: 200.450</p>	<p>Food-related expenses associated with lobbying are always unallowable except in the very rare instance when such expenses are related to travel for the purpose of technical and factual presentations on topics directly related to the performance of a grant, contract, or other agreement in response to a documented request made by a member of congress, legislative body or a subdivision, or a cognizant staff member.</p> <p>Lobbying includes certain influencing activities associated with obtaining grants, contracts, cooperative agreements, or loans or attempting to influence either directly or indirectly an employee or officer of the executive branch of the Federal Government to give consideration or to act regarding a Federal award or a regulatory matter.</p>
<p>As part of CONFERENCE / MEETING</p> <p>Applicable UG Section: 200.432</p> <p>NIH --GRANTS POLICY STATEMENT, dated 3/31/15 Sections: 7.9.1 and 14.10.1</p> <p>NSF – Proposal & Award Policies and Procedures Guide (16-1), Chapter II, Section C.2.g.(xii).(b) – Meals and Coffee Breaks; & Chapter II, Section D.9</p>	<p>Food-related expenses associated with a conference <u>are allowable when:</u></p> <ul style="list-style-type: none"> • The event at which the food expenses are incurred meets the below definition of “conference”, <u>and</u> • The expenses are paid by UCI as the sponsor or host of the event; <u>and</u> • In the case of NIH awards the meals must be an integral and necessary part of the meeting/conference (i.e. business is transacted during the meal). <p>Food-related expenses associated with a conference are unallowable when:</p> <ul style="list-style-type: none"> • The award is from NIH and the primary purpose of the grant was to support a conference or meeting or the food is for recurring business meetings, such as staff meetings, which are being broadly considered as meetings for the primary purpose of disseminating technical information in order to justify charging meals or refreshment to costs to grants; OR • The award is from NSF. <p>At 2 CFR 200.432, the UG defines “conference” as a meeting, retreat, seminar, symposium, workshop or event whose primary purpose is the dissemination of technical information beyond the non-Federal entity [UCI] and necessary and reasonable for successful performance under the Federal award.</p> <p>NOTE: Conference hosts/sponsors must exercise discretion and judgment in ensuring that conference costs are appropriate, necessary and managed in a manner that minimizes costs to the Federal award.</p>