

Date: December 12, 2005

TO: Principal Investigators, Co-PI's, Dean's, Directors, Chairs, and Graduate Program Directors

FROM: Kelsey R. Downum, Assoc. VP for Research

SUBJECT: Payment of graduate tuition and fees from contract/grant sources

This communication is intended to align university policy and practice with federal guidelines outlined in OMB Circular A-21 by clarifying two sections of the OSRA Faculty/Staff Guide for the Administration of Externally Funded Projects - INTERIM VERSION regarding payment of student tuition and fees from contract and grant sources: Reference is to Section **IV.G.8. -Tuition and Other Payments to FIU Students** in the Pre-Award Policies and Procedures and Section **IV.B. Graduate Students** in the Post-Award Policies and Procedures. **These changes are effective immediately.**

The Question: Can PI's pay the full cost of tuition and fees for graduate research assistants (GRA's) from grant sources?

The Answer: No. Tuition for graduate assistants (GRA's and GTA's) has to be consistently provided in a like manner to students in return for similar activities conducted in sponsored as well as nonsponsored activities (see point 2 below).

According to OMB Circular A-21, sec. J. 45 a (1-5), it is allowable to pay the "full" cost of GRA tuition provided that the individual is: 1) conducting activities necessary to the sponsored agreement; 2) tuition is provided in accordance with established institutional policy and consistently provided in a like manner to students in return for similar activities conducted in nonsponsored as well as sponsored activities; 3) during the academic period, the student is enrolled in an advanced degree program and the activities of the student in relation to the federally sponsored project are related to the degree program; 4) tuition is reasonable compensation for the work performed and is conditioned explicitly upon the performance of necessary work; and 5) it is the institution's practice to similarly compensate students in nonsponsored as well as sponsored activities.

Points 1, 3, and 4, respectively, are functions of the PI (i.e., graduate advisor), the FIU Graduate Policies and Procedures, or are self-evident. However, a statement addressing point 2 is not explicitly stated in OSRA's Faculty/Staff Guide. In order to align FIU practice with federal guidelines on these points and to enhance the resources available to attract a more competitive GRA pool, PI's and co-PI's need to be informed of the following:

The respective sections of the OSRA Faculty/Staff Guide for the Administration of Externally Funded Projects - INTERIM VERSION will be modified to reflect that it is university policy to provide the matriculation fee portion of tuition and fees and the GA insurance subsidy consistently to all GA's. Please note that per University regulation, effective the Fall 2005 term, during any semester in which a graduate nonresident student has been appointed as a GA for at least .25 FTE, the nonresident fee for the student shall be \$0.00.

Proposals processed through OSRA will be reviewed to ensure that PI's request the matriculation fee portion of tuition and fees and the GA insurance subsidy for GRA's on a consistent basis across departments, schools, and colleges. Per credit and per semester fees are not provided to graduate assistants paid from institutional sources and cannot be charged as tuition or fees to granting agencies.

PI's who wish to hold GRA's harmless for uncovered fees can increase GRA wages up to recognized Federal levels (i.e., wages plus tuition and fees must be less than or equal to the zero level post-doctoral appointment under the National Research Service Award standards - <http://grants.nih.gov/training/nrsa.htm>). Tuition paid to students as, or in lieu of, salaries and wages directly from the sponsored project shall be treated as direct charges in accordance with the actual work being performed. Please contact me (downumk@fiu.edu) to arrange this.

If you have any questions, comments, concerns regarding these changes, please contact me via email – downumk@fiu.edu.