

Tuition charges on federally funded research accounts:

- 1) According to general federal research grant regulations (in both old and new regulations - OMB Circular A-21 and Uniform Guidance 2 CFR 200.466), tuition remission/ student aid payments are only allowable from research awards when it is in accordance with established institutional policy and consistently provided in a like manner to students in return for similar activities conducted in non-sponsored as well as sponsored activities. At K-State, GTA's are provided with tuition remission, GRA's are not. Therefore, at K-State, because of the lack of university-wide policy for tuition remission for GRA's, the federal criteria of an institutional policy that does not distinguish between sponsored and non-sponsored funding is not met and payment of tuition as a form of student aid (tuition remission, scholarship/fellowship) is not allowable from federal grant funds.
- 2) Therefore, cost of tuition for GRA's may only be charged to a research grant when a department has included tuition and fees in the compensation package of a student who is employed at K-State as a Graduate Research Assistant (GRA) and the department wishes to pay the tuition and fees on behalf of the student in return for services rendered (in lieu of salary). Processing the payment in this manner is for the convenience of the student and does not change the fact that the purpose of the payment is for services rendered (employment). The amount paid will be reflected on the student's W-2 as compensation for services.
- 3) 2 CFR 200.466 also indicates that the payment of tuition/student aid as compensation must be conditioned explicitly upon the performance of necessary work; the student must be enrolled in an advanced degree program and the activities of the student in relation to the federal award are related to the degree program; and it is the institution's practice to similarly compensate students under federal awards as well as other activities.
- 4) Additionally, any cost charged directly to a federally funded sponsored account must meet the federal criteria of a direct, allowable cost – 2 CFR 200.403 -405 and .413. Key phrases from those regulations include “necessary for the performance of the Federal award”, “incurred specifically for the Federal award”, and “consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-federal entity”.