

JACKSONVILLE STATE UNIVERSITY
Manual of Policies and Procedures

POLICY NO.: I:01:22

DATE: January 16, 2019

REVIEW/REVISION DATES: May 2026

SUBJECT: Cost Sharing/Matching for Grants

APPROVED: Dr. Don C. Killingsworth, Jr., President

PURPOSE

This policy establishes requirements for managing cost sharing (matching) on sponsored awards to ensure compliance with 2 CFR Part 200 (Uniform Guidance) and sponsor requirements. All cost sharing; federal and non-federal, must be properly authorized, documented, and auditable.

OVERVIEW OF POLICY

Cost sharing is the portion of project costs not funded by the sponsor and supported by Jacksonville State University (JSU) or a third party.

- JSU discourages cost sharing unless required by the sponsor.
- All committed cost sharing is binding upon award, must be tracked, and may be reported.
- Cost sharing must comply with 2 CFR 200.306, including allowability, valuation, documentation, and auditability requirements.

Voluntary committed cost sharing is prohibited in federal proposals unless explicitly required by the Notice of Funding Opportunity (2 CFR 200.306(a)).

All cost sharing must:

- Be verifiable from JSU records.
- Not to be used for multiple federal awards.
- Be allowed under [2 CFR Part 200, Subpart E](#).
- Not be funded by another federal award unless authorized.
- Be included in the approved budget when required.

Failure to properly document cost sharing may result in audit findings, reduction in funds, or repayment of funds to the sponsor.

POLICY

This policy applies to all Principal Investigators (PIs) or Program Directors (PDs), departments, and administrators involved in sponsored programs.

Types of Cost Sharing

1. **Mandatory Committed** – Required by sponsor; must be included in proposal and tracked.
2. **Voluntary Committed** – Not allowed in federal proposals unless required; becomes binding if included.
3. **Voluntary Uncommitted** – Not included in proposal; not tracked or reported.
4. **Over-the-Cap Salary** – Salary above sponsor limits; unallowable as cost sharing (2 CFR 200.306(b)(5), 200.430(h)).

Allowability Requirements

To be allowable, cost sharing must:

- Meet allowability, allocability, and reasonableness standards (**2 CFR 200 Subpart E**).
- It is necessary to accomplish project objectives.
- Be incurred during the period of performance.
- Be verifiable through institutional records.
- Be certified through effort reporting, when applicable.

Cost sharing may not:

- Be used for another federal award.
- Be funded by federal sources unless authorized.
- Be charged to another sponsored project.
- Include effort outside contractual appointments.

Facilities and Administrative (F&A) cost sharing is allowable only when permitted by the sponsor and properly documented in the proposal.

RESPONSIBILITIES

Principal Investigator (PI)/Project Director (PD) and Department

Proposal Stage

- Identify cost sharing requirements and ensure proposed costs are allowable and properly justified.
- Obtain required approvals prior to submission.

Award Period

- Monitor cost sharing commitments throughout the award period.
- Notify OSP and Grant Accounting of changes in source or amount.
- Ensure effort used as cost sharing is certified in accordance with 2 CFR 200.430(i) and JSU policy.
- Provide documentation needed for reporting.

Closeout

- Confirm that cost sharing commitments are met.
- Resolve discrepancies with Grant Accounting.
- Assume responsibility for unmet commitments where sponsor reductions are not approved.

Deans, and Provost

- Review and approve cost sharing commitments at proposal stage.
- Ensure availability of funds for committed cost sharing.
- Monitor cost sharing throughout the award period.
- Coordinate resolution of cost share discrepancies at closeout.

Office of Sponsored Programs (OSP)

Proposal Stage

- Review cost sharing for compliance with sponsor and JSU requirements.
- Verify allowability, approvals, and supporting documentation.

Award Period

- Confirm availability of committed cost sharing funds.
- Monitor changes to cost sharing commitments.
- Coordinate sponsor approvals when required.
- Request renegotiation when commitments cannot be met.

Grant Accounting (GA)

- Establish appropriate accounts to track cost sharing.
- Monitor expenditures for compliance with policy and sponsor requirements.
- Confirm fulfillment of cost sharing commitments.
- Report on cost sharing to sponsors, when required.
- Maintain internal controls to prevent unallowable or unapproved cost sharing.

PROCEDURES

To obtain approval to submit a proposal that includes cost sharing, the following steps must be taken:

- PIs/PDs must notify OSP and schedule a **Pre-Proposal Planning Meeting**
- An **Intent to Apply Form (ITAF)** must be submitted at least two (2) weeks prior to the proposal due date.
- Cost share commitments must be documented and approved prior to proposal submission.
- Approval of cost sharing contributions by the Senior Director of Sponsored Programs must be retained and submitted via email or memo.

- A draft proposal must be submitted at least **7 days prior** to the deadline for Cayuse 424 routing and approval before submission.
- Final proposal documents must be submitted to OSP at least **3 days prior** to the sponsor deadline for review, verification, and submission.
- All cost sharing must be incurred within the award's period of performance.

Changes to cost sharing (amount, source, or scope) require sponsor approval when applicable in accordance with **2 CFR 200.308**.

DOCUMENTATION

All mandatory and committed cost sharing must be:

- Properly recorded in the JSU's systems.
- Supported by verifiable documentation.
- Available for audit review.

Failure to meet cost sharing commitments may result in reduced funding or required repayment.

Additional Requirements

- Anticipated under-contributions of **10% or greater** must be reported immediately to OSP.
- Third-party contributions must be at fair market value, documented with supporting valuation methodology, and meet **2 CFR 200.306(d-k)** requirements.
- Volunteer services and donated goods must be supported by reasonable valuation documentation.
- Subrecipients must report cost sharing contributions on invoices and maintain supporting documentation for audit purposes.

REVISIONS TO MANDATORY AND COMMITTED COST SHARE

PIs/PDs are responsible for ongoing monitoring of cost sharing commitments.

The following changes require OSP review and, when applicable, sponsor approval:

- Change in amount.
- Change in funding sources.
- Change in timing.
- Change affecting project scope or objectives.

A revised cost sharing plan must be submitted for approval when changes occur.

RESPONSIBILITY

The Senior Vice President for Finance and Administration is responsible for this policy.

EVALUATION

This policy will be reviewed every five (5) years by the University Controller.

REFERENCE

[2 CFR Part 200](#),