PACE PREPAID DATA STORAGE COSTS – GUIDANCE

Direct charges to sponsored projects are allowable if they can be identified specifically to a particular sponsored project and are not treated as a facility or administrative (F&A) cost item. The general criteria are as follows:

* They must be necessary, reasonable, and allocated based on proportional benefit
* They must conform to any limitations or exclusions set forth in 2 CFR 200, the terms and conditions of the individual award, and applicable agency guidelines as to types or amount of cost items. This includes that all costs must be within the period of performance (POP)
* They must be consistent with policies and procedures that apply uniformly to both Federally financed and other activities of the non-Federal entity
* They must be accorded consistent treatment as either a direct or indirect (F&A) cost
* They must be determined in accordance with generally accepted accounting principles (GAAP)
* They must not be included or used to meet cost sharing or matching requirements of any other Federally financed program
* They must be adequately documented

Due to evolving requirements around the security, storage and sharing of large data sets used in research awards, there may be instances when storage needs to be pre-purchased to cover a period of time that extends past the end data on the sponsored award. If the Principle Investigator (PI) requests such a purchase, the following criteria should be used as a guide to determine if this is an allowable charge:

* Is the charge explicitly allowable, either within the award documentation or via approval from the sponsoring agency?
* Can the PI prove to an auditor that the charge to the sponsored award was proportionate to the benefit to the award?
* If other sponsored, departmental research, or instructional activities may benefit from storage of the data, a proportional charge to other sponsored and/or internal funding sources should take place and the allocation justification must be documented.