**Memberships, Subscriptions and Professional Activity Costs Funded by University of Arkansas Sponsored Programs**

**Introduction**

This document is intended to serve as formal guidance for University of Arkansas regarding the use of funds from sponsored programs for memberships, subscriptions, and professional activities in like circumstances. The university is committed to ensuring costs incurred in support of sponsored programs are allowable, reasonable, and allocable to a particular sponsored award, as defined by U.S. Office of Management and Budget’s Uniform Guidance ([2 CFR §200.403-405](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=73145d68c639365c0ebd774733273a0d&mc=true&n=sp2.1.200.e&r=SUBPART&ty=HTML#se2.1.200_1403)); are in compliance with sponsor requirements; and are administered consistently across the campus for all sponsored programs. Procedural statements support the University of Arkansas [Cost Principles Policy](https://vcfa.uark.edu/policies/fayetteville/avcf/3101.php) by providing definitions and processes for meeting those standards in like circumstances.

**Definitions**

University of Arkansas defines memberships, subscriptions, and professional activities as:

**Memberships** *are fees or dues paid for an individual or an institution to join a technical, business, or professional organization for a specific length of time. Individual memberships are associated with, and provide benefits to, a single person only. Institutional memberships are associated with, and provide benefits to, an entire non-federal entity (University of Arkansas)*

**Subscriptions***are payments in exchange for receiving technical, business, or professional periodicals or access to information (ex. inter-library searches or national DNA database).*

**Professional activities** *are intended to enhance an individual’s professional development, including obtaining skills and qualifications in order to progress in his/her career.*

**Application**

**Federal Awards**

Institutional

Under the guidelines imposed by the U.S. Office of Management and Budget’s Uniform Guidance ([2 CFR 200.454](http://www.ecfr.gov/cgi-bin/text-idx?SID=c3177857cee8ebceb302215153fd1f73&node=se2.1.200_1454&rgn=div8)), costs for institutional memberships in business, technical, and professional organizations and institutional subscriptions to business, technical, and professional periodicals are allowable. The costs must be reasonable and allocable to the award. A brief justification for the costs must be documented with the expense. It is also University of Arkansas’ position that sponsor approval is required prior to charging professional activity costs to a federal award.

Individual

Individual memberships are treated as indirect costs per 2 CFR 200 Appendix III.B.6.b.(2). The exception for individual memberships is when University of Arkansas receives an award with an institutional allowance, and the Federal agency specifically allows direct charging of individual dues, or memberships, or subscriptions. In these cases, memberships, subscriptions, and professional activity costs may be charged directly to a sponsored program. Examples of these types of awards include NIH or NASA fellowships, training programs, or any other type of award with an institutional allowance. The membership, subscription, or professional activity cost should directly benefit the fellow or participant.

**Non-Federal Awards**

Section [2 CFR 200.403(c)](http://www.ecfr.gov/cgi-bin/text-idx?SID=bfd6dd4195370a1a871446e87b4c9616&mc=true&node=se2.1.200_1403&rgn=div8) of the Uniform Guidance requires that we apply our policies and procedures uniformly to both federally-financed and other activities of the university. Therefore, University of Arkansas’ [Cost Principles Policy](https://vcfa.uark.edu/policies/fayetteville/avcf/3101.php) and related procedural statements are also applicable to non-Federal awards. The basic criteria for membership, subscription, and professional activity costs are similar for non-Federal sponsored programs, but it is also important to be familiar with the requirements or restrictions of each non- Federal sponsor. When allowed by the non-Federal sponsor, a written justification for the inclusion of membership, subscription, and professional activity costs should be provided in order to explain why these are necessary to fulfill the objective of the program, and to ensure that the cost directly benefits the program being charged, even when the non-Federal sponsor may follow more flexible spending guidelines.

**Process**

At Proposal

Costs for dues, memberships, subscriptions, or professional activities may be included on a Federal proposal when the sponsor specifically allows these types of costs through an institutional allowance, or other identified support for career development.

Some non-Federal sponsors may allow dues, membership, subscriptions, and professional activity costs to be direct charged. Review of the requirements and restrictions of the non-Federal sponsor is required to ensure allowability. If allowable, these costs should be identified in the proposal budget justification as to why they are necessary and allocable to the performance of the award. Inclusion in the budget justification is intended to enable the sponsor to review and concur with the need for the costs. Written justification and approval is meant to prevent questions regarding the allowability of costs in the event of an audit.

After an Award is Funded

Typically, when University of Arkansas receives an institutional allowance, it is coded in the finance system. Review of the award document may be necessary to confirm that an institutional allowance was received. In addition, sponsor requirements and restrictions related to institutional allowances should be reviewed to ensure the institutional allowance may be used for these types of costs.

Not every cost can be anticipated at the time of proposal preparation. In the event that an unbudgeted (not specifically identified in the budget justification submitted with the proposal) membership, subscription, or professional activity cost is required after a award is funded, the PI or department administrator should work directly with their RSSP Grant Specialist to document the necessity and benefit of the cost. If sponsor approval is required, the RSSP Grant Specialist will contact the sponsor for approval. The sponsor approval (if required), as well as the written justification explaining the need and benefit of the cost to the specific program, will be retained by the department and in Razorgrant for future reference should the expenditure be questioned at a later date.