

## **Procedure**

Effective Date March 26, 2023

Publication Costs charged to a Sponsored Program

## Overview:

This procedure applies to Federal and Federal flow through assistance (e.g., grants and cooperative agreements) awarded to Clemson University. Faculty engaged in research are encouraged and/or required to report research findings through publications, posting data, presentations and other mechanisms. The costs associated with publications are an allowable cost and should be anticipated and budgeted at the proposal/submission stage.

## **Publication Costs:**

The NIH specifically states: "Publication costs, including author fees, may be charged to NIH grants and contracts on three conditions: (1) such costs incurred are actual, allowable, and reasonable to advance the objectives of the award; (2) costs are charged consistently regardless of the source of support; (3) all other applicable rules on allowability of costs are met." NSF likewise states: "You may request funds to cover costs of publication, page charges, or preparation of data as a direct cost in your budget proposal, which is evaluated as part of the merit review process. See the <a href="mailto:Grant Proposal Guide II.C.2.g.(vi) b.">Grant Proposal Guide II.C.2.g.(vi) b.</a>, <a href="Publication/Documentation/Dissemination">Publication/Documentation/Dissemination</a> for additional information."

2 CFR 200.461 states that "publication costs," including "costs for electronic and print media, including distribution, promotion, and general handling" are allowable as a direct cost when identifiable with a particular award.

Page charges for professional journal publications are also allowable when:

- —The publication reports on the work supported by the award, and
- —The publisher charges the same costs for all items published.

## Methods and Use

- Publication costs should be anticipated, justified and included in the proposal budget.
- When possible, publication costs should be incurred during the project period; however,
- The federal government has recognized that final data and analysis may not take place until after project end. Therefore, publication costs may be incurred after the end date of the award (Total Period End Date), but before award closeout. This means that the costs must be posted to the award (paid) by the official Clemson closeout date in order for the costs to be included in final invoicing/reporting.

- If it is anticipated that publication costs will need to be paid after the closeout date and the submission of the final invoice, then a No-Cost Extension (NCE) must be obtained or requested from the federal sponsor.
- As with any type of cost, an estimated amount of anticipated publication costs may not be added to the final invoice/financial report to allow for costs to be incurred after closeout.
- All costs must meet the standard of being allowable, allocable, and reasonable as required by federal standards.
- o Important Note: If the publication includes results and related data derived from projects with multiple funding sources, the costs of the publication should be appropriately allocated, dependent on the percentage of input from each project. It is not appropriate to charge all publication costs to a single project when other support contributed to the publication