**Purpose:** The Uniform Guidance requires that all costs charged to the federal government under grants, contracts, and cooperative agreements pass the criteria of allowability, allocability, and reasonableness. Determining whether a cost passes these criteria and whether it can be treated as a direct or indirect cost sometimes depends on a complex evaluation that requires consideration of the terms of the award and nature of the specific project. To facilitate School-wide consistency in determining the allowability of certain costs, HMS has developed an Allowability Panel to which questions regarding the allowability of charging specific items of cost to any sponsored project, not just federally-funded awards, can be addressed.

**HMS Process:**  
Administrators and faculty who need assistance in determining the allowability of a cost should send an email to allowability@hms.harvard.edu with the following information:

1. The project name / fund number and type (i.e., Federal, foundation, industry, etc.) of the applicable sponsor in the subject line;
2. A detailed description of the nature of the questioned cost;
3. A description of the analysis performed to date and what factors are making an allowability determination difficult.

The Allowability Panel email address will be monitored daily. When questions are received, the designated email reviewer will forward the emails to a Panel comprised of representatives from Finance, OSP, Research Compliance, Research Operations, SPA and a Department.

In reaching its determination, the Panel will consider the terms and conditions of the award, sponsor guidelines, University Policy, and federal cost principles, as applicable. If a final determination cannot be made based on available information, the Panel may contact the sponsor for clarification on guidelines/terms.

Each Panel member will have two business days after the email inquiry is forwarded to respond with his/her view on the allowability of the cost. The decision made by the majority of the panel will be communicated to the originator of the inquiry within three business days.

**Allowability Panel FAQs:**

When answers provided by the Panel provide generalizable knowledge that will be useful to the HMS community, a summary of the initial question and Panel determination will be posted to the HMS Allowability Panel section of the Harvard Longwood Campus Research Administration website.