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October 15, 2025

MEMORANDUM

TO: All Prospective Contractors/Applicants/Subawardees

FROM: Susan J. Sullivan, Executive Director

RE: **NEIWPCC Indirect Policy**

NEIWPCC's Indirect Cost Policy for Applicants

NEIWPCC recognizes that in some instances, applicants may have costs that are not directly attributable to projects or activities being funded but that the recovery of those indirect costs is necessary in order to effectively implement the respective projects or activities. In those situations, the following indirect cost policy applies.

- Applicants without a Negotiated Indirect Cost Rate Agreement (NICRA) may elect a de minimis indirect cost rate of up to 15% of Modified Total Direct Costs (MTDC) under awards executed on or after October 1, 2024, consistent with 2 CFR § 200.414(f).
    - For awards made before October 1, 2024, or awards not subject to the 2024 revisions, the de minimis rate of up to 10% of MTDC continues to apply.
- Applicants (including academic institutions) with a valid Negotiated Indirect Cost Rate Agreement (NICRA) with their cognizant federal agency can charge indirect costs to projects based on their negotiated indirect cost rate.
    - A valid NICRA is one in which the effective period has not expired. Applicants must provide a copy of their valid NICRA with their application for indirect costs reimbursement to be considered. If the effective period of the NICRA has expired but the grantee has documented evidence (via an indirect cost rate proposal) that they have reapplied for a new rate, the expired rate may be accepted.