

Purpose

To guide Research Advancement (RA) staff and Grant and Contract Officers (GCO) through the process for completing an executed “Certificate of Current Cost or Pricing Data.”

Related Materials

Job Aid: Request for Execution of Certificate of Current Cost or Pricing Data Job Aid (This document)

Template: [Request for Execution of Certificate of Current Cost or Pricing Data](#)

Template: [Certificate of Current Cost or Pricing Data](#) (See [FAQ #7](#) below)

Definitions

- “Costs” refers to amount of money for elements/line items (e.g., personnel, materials/supplies) required to implement project activities and produce deliverables, e.g., research results, instruments, other contract outcomes.
- “Price” means cost plus fee/profit. As a non-profit institution, ASU does not budget fees or profit; cost and price are equal. ASU subcontractors that are industry/commercial entities typically include fee/profit in proposals.
- “Cost or pricing data” refers to all facts that can reasonably contribute to the soundness and validity of estimates of future costs and, thereby, can be considered during price negotiations.

Relevance

1. The **Department of Defense (DOD)** does NOT require a Certificate of Current Cost or Pricing Data from non-profit educational institutions and other non-profit organizations awarded via cost-reimbursement contracts or subcontracts. However, non-profits that subcontract DOD funds to industry/commercial entities are required to obtain Certificates from the for-profit subcontractors (at all lower tiers).
2. A Certificate of Current Cost or Pricing Data is required by **all other Federal Agencies** that will award via contract **equal to or exceeding \$2,000,000**.
 - 2.1. For contracts less than the threshold, a Certificate is required once contract is modified to equal or exceed it.
3. Sponsor requirement for a “Certificate of Current Cost or Pricing Data” is stated in funding opportunity announcement or in the list of Federal Acquisition Regulations clauses.
4. A certificate is required after proposal is selected for award, terms and conditions have been negotiated, and the Contracting Officer and Contractor agree upon cost.
 - 4.1. Occasionally a certificate is required as part of proposal submission. A new certificate will be required after award T&Cs and contract cost are agreed upon.

Process

1. The Research Advancement Administrator (RA):
 - 1.1. Notifies GCO of sponsor requirement;
 - 1.2. Develops budget-budget justification (BU-BJ) in level of detail required by sponsor. For example: details for materials/supplies include itemized list of items per year, quantities, unit prices, proposed

vendors (if known), and basis of estimates; justification for ASU travel includes purpose of trip, origin and destination, duration, number and position of travelers per trip, as well as number of trips.

- 1.3. Once BU-BJ is final, downloads the “Request for Execution of Certificate of Current Cost or Pricing Data” (“Request”) form, places on unit letterhead, obtains PI signature, and signs the RA signature block;
 - 1.4. Downloads the “Certificate of Current Cost or Pricing Data” (“Certificate”) and enters project specific information (FP number and proposal title); and
 - 1.5. Uploads final BU-BJ, signed “Request” (pdf), and “Certificate” (Word) documents to ERA via “Notify PNT” activity.
2. Upon receipt of the completed documents, the GCO:
- 2.1. Reviews request for completeness;
 - 2.2. Conducts Proposal and Negotiation Team (PNT) review of BU-BJ plus additional evaluation for level of detail required by sponsor funding opportunity announcement;
 - 2.3. After BU-BJ is final, confirms content of certificate is correct (no modifications other than addition of project specific information), enters institutional information, and obtains signature from individual authorized to execute contracts;
 - 2.4. Uploads scan of signed certificate to ERA via “Email RA” activity; and
 - 2.5. Informs RA that certificate is ready for inclusion in proposal package.

Frequently Asked Questions

1. WHAT FEDERAL REGULATION TRIGGERS REQUIREMENT FOR A CERTIFICATE OF COST OR PRICING DATA?

Federal Acquisition Regulations (FAR) [Part 15-Contracting by Negotiation](#), e.g., 15.403-4 which requires certified cost or pricing data and 15.403-5 which lays out instructions for submission of certified cost or pricing data and data other than certified cost or pricing.

2. WHAT IS A CERTIFICATE OF CURRENT COST OR PRICING DATA?

A Certificate of Current Cost or Pricing Data is required for contracts equal to or greater than \$2,000,000 that meet requirements prescribed in the Federal Acquisition Regulations. Certification is a requirement of the Truth in Negotiations Act (TINA), a public law enacted for the purpose of ensuring Contractors provide full disclosure of relevant information during negotiations with the Government so the Government can perform an effective independent evaluation of the contractor’s cost proposal to ensure it pays a fair and reasonable price.

3. WHY ARE COST OR PRICING DATA IMPORTANT?

Certified cost or pricing data assists the Government conducting an effective independent evaluation of the cost proposal and thereby supports the Government’s determination of “fair and reasonable” prices.

4. WHEN ASU SIGNS A CERTIFICATE, WHAT IS ASU AGREEING TO?

The authorized signatory certifies on behalf of the institution that to the best of her/his knowledge and belief, the cost/pricing data presented are accurate, complete, and current as of the date sponsor’s

Contracting Officer and Contractor (ASU) agreed upon price during award negotiation or date of proposal submission, if Certificate is required with application.

5. HOW CAN PI and RA ENSURE COST/PRICING DATA IN PROPOSAL BUDGET ARE ACCURATE, COMPLETE, AND CURRENT?

Develop cost proposals in accordance with institutional policies and best practices described on the [Research Admin website](#) which are based upon the Office of Management and Budget 2 CFR 200 “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” and University, Arizona Board of Regents, and State of Arizona policies.

6. WHAT ARE COST OR PRICING DATA?

Cost or pricing data are more than historical invoice data or engineering estimates. They are objective, verifiable information, “facts,” that are relevant to evaluate proposed budget and future costs. Facts include, but are not limited to:

- Payroll screen prints for named individuals, relevant details highlighted or added, e.g., basis for monthly rate (appointment period (nine-month AY/twelve-month FY), unusual features
- Job posting with salary range for to-be-named individuals
- Federally-negotiated rate agreement
- Vendor quotes
- Catalogue prices
- Links to recharge center instrument use rates
- Justification for utilizing non-campus expertise, e.g., subcontracting with external organizations, contracting with technical vendors
- Justification for purchasing equipment or utilizing services (for example, purchase a high-performance server, utilize on-campus core computing services, or subscribe to Cloud computing)
- Engineering estimates that are verifiable mathematical calculations (rather than result of applied judgement)
- Subrecipient collaborator cost proposals are presented in required level of detail and, if sponsor requires, a copy of the cost/price analysis ASU used to determine reasonableness of sub’s proposal

7. WHERE DO I FIND THE FORM/FORMAT FOR A COST OR PRICING CERTIFICATE?

FAR 15.406-2 presents the standard content and format for a Certificate of Current Cost or Pricing Data. RAs should first check the Funding Opportunity Announcement (FOA) to determine if sponsor provided a form for certificate. If not, the template provided in this job aid may be used. RA inserts project-specific information, GCO adds institutional information and obtains authorized signature, and returns to RA for insertion into proposal package.