

4.7.2 ALLOWABLE AND UNALLOWABLE COSTS AND ACTIVITIES

All SCBGP awards are subject to the most recent [General Award Terms and Conditions](#), *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR part 200)*, and other laws and regulations affecting Federal assistance.

Applicants that have questions concerning the allowability of costs after reviewing the associated Federal cost principles should contact the SCBGP using the contact information listed under [7.0 Agency Contacts](#).

Item	Description
Advisory Councils	<i>Unallowable</i> for costs incurred by advisory councils or committees.
Alcoholic Beverages	<p><i>Unallowable</i> for alcoholic beverages.</p> <p><i>Allowable</i> for projects under the SCBGP when the costs are associated with enhancing the competitiveness of an eligible processed product (products prepared or created for the purposes of promoting a specialty crop but that require other ingredients are considered a processed product). A processed product is defined as a product that constitutes greater than 50% of the specialty crop by weight, exclusive of added water.</p>
Buildings and Land – Construction	<p><i>Unallowable</i> for the acquisition of buildings, facilities, or land or to make additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations or alterations of an existing building or facility (including site grading and improvement, and architecture fees). This also includes construction and construction-related materials, which may include, but are not limited to, the purchase of building materials such as wood, nails, concrete, asphalt, roofing, gravel, sand, paint, insulation, drywall, or plumbing.</p> <p><i>Allowable</i> for rental costs of land and building space. However, lease to own agreements (i.e., lease-to-own or rent-to-own) are not allowable. The lease or rental agreement must terminate at the end of the grant cycle.</p> <p>A <i>building</i> is any permanent structure designed or intended for support, enclosure, shelter or protection of people, animals, or property and having a permanent roof supported by columns or walls.</p>
Aquaponics	<p><i>Allowable</i> as long as the cultivated crops are eligible specialty crops and the focus of the project is on the specialty crops and not the fish.</p> <p><u>Projects that are Acceptable</u></p> <ul style="list-style-type: none"> • A project to determine whether carp, catfish, or tilapia are best for growing lettuce is acceptable. • A project to market broccoli grown through aquaponics is acceptable. • A project to compare the quality of lettuce grown in water to lettuce grown in a greenhouse is acceptable.

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	<p><u>Projects that are NOT Acceptable</u></p> <ul style="list-style-type: none"> • A project to study whether lettuce or tomato produced the highest yield of tilapia is not acceptable. • A project to farm fish using an aquaponics system and then sell the fish is not acceptable. • A project to grow specialty crops where both the specialty crops and the fish are sold is not acceptable. <p>For more information on constructing or purchasing an aquaponics system, see Equipment-General Purpose and Equipment – Special Purpose.</p>
Conferences	<p><i>Allowable</i> for costs of conferences as defined in 2 CFR § 200.432. Allowable conference costs paid by the non-Federal applicant or subapplicant as a sponsor or host of the conference may include rental of facilities, speakers’ fees, costs of meals (see Meals for restrictions) and refreshments, local transportation, and other items incidental to such conferences with the exception of entertainment costs that are unallowable. If registration fees are collected, the applicant or subapplicant must report fees as program income (See Program Income).</p> <p>The SCBGP encourages the use of technologies such as webinars, teleconferencing, or videoconferencing as an alternative to renting a building or a room.</p>
Contingency Provisions	<p><i>Unallowable</i> for miscellaneous and similar rainy-day funds for events the occurrence of which cannot be foretold with certainty as to the time or intensity, or with an assurance of their happening. Unallowable for working capital for activities/items not already in place.</p>
Contractual/Consultant Costs (Professional Services)	<p><i>Allowable subject to limitations below.</i> Contractual/consultant costs are the expenses associated with the purchase of goods and/or the procurement of services performed by an individual or organization other than the applicant in a procurement relationship.</p> <p><i>Allowable</i> for contractor/consultant employee rates that do not exceed the salary of a GS-15 step 10 Federal employee in your area (for more information please go to https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/). This does not include fringe benefits, travel, indirect costs, or other expenses. Please note that any statutory limitations on indirect costs also apply to contractors and consultants.</p> <p>If rates exceed this amount, one of the following justifications must be provided:</p> <ul style="list-style-type: none"> • A description of the steps you took to hire a contractor, which includes obtaining a cost/price analysis. The purpose of the analysis is to review and evaluate each element of cost to determine reasonableness, allocability, and allowability. <p>OR</p>

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	<ul style="list-style-type: none"> Due to the complexity or uniqueness of the project, the pool of available and qualified contractors is limited. Therefore, the selected contractor's specialized qualifications necessitate hiring at a rate beyond a GS-15 step 10. (Please outline the unique qualifications of the contractor.)
Contributions and Donations	<p><i>Unallowable</i> for contributions or donations, including cash, property, and services, from the applicant or subapplicant to other entities.</p> <ul style="list-style-type: none"> A non-profit entity using grant funds to purchase produce to donate to other entities and individuals is unallowable.
Electronic Benefit Transfer (EBT) Machines	<p><i>Unallowable</i> for the purchase/lease of Supplemental Nutrition Assistance Program (SNAP) EBT equipment.</p> <p>The USDA Food and Nutrition Service (FNS) has existing funding to expand the availability of SNAP EBT equipment and services at farmers markets through the Farmers Market Coalition and State SNAP agencies. Recipients should review the below options to determine which is most appropriate.</p> <ul style="list-style-type: none"> The Farmers Market Coalition provides SNAP-authorized farmers markets and direct marketing farmers with free SNAP EBT equipment. State SNAP agencies or farmers market associations offer free SNAP EBT equipment to newly authorized farmers markets and direct marketing farmers. FNS SNAP and Farmers Markets resources provide additional EBT information.
Entertainment Costs	<p><i>Unallowable.</i> Entertainment costs include amusement, diversion, social activities, and any costs directly associated with such costs (such as bands, orchestras, dance groups, tickets to shows, meals, lodging, rentals, transportation, and gratuities).</p>
Equipment	<p><i>Unallowable</i> for acquisition costs of general purpose equipment or lease to own agreements (i.e., lease-to-own or rent-to-own).</p> <p><i>Allowable</i> for rental costs of general purpose equipment. Vehicles may be leased, but not purchased. The lease or rental agreement must terminate at the end of the grant cycle.</p> <p>For vehicle and equipment leases or rentals with an acquisition cost that equals or exceeds \$5,000, rates should be in light of such factors as: rental costs of comparable vehicles and equipment, if any; market conditions in the area; alternatives available; and the type, life expectancy, condition, and value of the vehicle or equipment leased.</p> <p><i>Allowable</i> for acquisition costs and rental costs of special purpose equipment provided the following criteria are met:</p> <ol style="list-style-type: none"> 1) Necessary for the research, scientific, or other technical activities of the grant award;

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	<p>2) Not otherwise reasonably available and accessible;</p> <p>3) The type of equipment is normally charged as a direct cost by the organization;</p> <p>4) Acquired in accordance with organizational practices;</p> <p>5) Must be used only to meet the legislative purpose of the grant program and objectives of the grant award;</p> <p>6) More than one single commercial organization, commercial product, or individual must benefit from the use of the equipment;</p> <p>7) Must not use special purpose equipment acquired with grant funds to provide services for a fee to compete unfairly with private companies that provide equivalent services; and</p> <p>8) Equipment is subject to the full range of acquisition, use, management, and disposition requirements under 2 CFR § 200.313 as applicable.</p> <p>Definitions</p> <p><i>Equipment</i> is defined as tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000.</p> <p><i>Acquisition cost</i> means the cost of the asset, including the cost to prepare the asset for its intended use. Acquisition cost for equipment includes the net invoice price of the equipment, including the any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable for its acquired purpose.</p> <p><i>General Purpose Equipment</i> means equipment that is not limited to technical activities. Examples include office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles.</p> <p><i>Special Purpose Equipment</i> is equipment used only for research, scientific, or technical activities.</p>
<p>Equipment – Information Technology Systems</p>	<p><i>Unallowable</i> for information technology systems having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds the lesser of the capitalization level established in accordance by Generally Accepted Accounting Principles (GAAP) by the recipient for financial statement purposes or \$5,000. Acquisition costs for software includes those development costs capitalized in accordance with GAAP.</p> <p>Information technology systems include computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources. Computing devices means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or “peripherals”) for printing, transmitting and receiving, or storing electronic information. Examples of unallowable information technology systems include service contracts,</p>

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	<p>operating systems, printers, and computers that have an acquisition cost of \$5,000 or more.</p> <p><i>Allowable</i> for website development, mobile apps, etc., that are not considered to be information technology systems, but rather social media applications.</p>
Fines, Penalties, Damages and Other Settlements	<p><i>Unallowable</i> for costs resulting from violations of, alleged violations of, or failure to comply with, Federal, State, tribal, local or foreign laws and regulations.</p>
Fixed Amount Subawards	<p><i>Allowable</i> with prior written approval from AMS. A pass-through entity may provide subawards based on fixed amounts up to the Simplified Acquisition Threshold, provided that the subawards meet the requirements for fixed amount awards in 2 CFR § 200.201.</p>
Fundraising and Investment Management Costs	<p><i>Unallowable</i> for organized fundraising, including financial campaigns, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions, regardless of the purpose for which the funds will be used. This includes salaries of personnel involved in activities to raise capital.</p>
General Costs of Government	<p><i>Unallowable</i> for:</p> <ol style="list-style-type: none"> 1) Salaries and expenses of the Office of the Governor of a State or the chief executive of a local government or the chief executive of an Indian tribe; 2) Salaries and other expenses of a State legislature, tribal council, or similar local governmental body, such as a county supervisor, city council, school board, etc., whether incurred for purposes of legislation or executive direction; 3) Costs of the judicial branch of a government; 4) Costs of prosecutorial activities unless treated as a direct cost to a specific program if authorized by statute or regulation (however, this does not preclude the allowability of other legal activities of the Attorney General as described in 2 CFR § 200.435 Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements); and 5) Costs of other general types of government services normally provided to the general public, such as fire and police, unless provided for as a direct cost under a program statute or regulation.
Goods or Services for Personal Use	<p><i>Unallowable</i> for costs of goods or services for personal use of the applicant's or subapplicant's employees regardless of whether the cost is reported as taxable income to the employees.</p>

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Health and Nutrition Messaging	<p><i>Allowable</i> when health and nutrition information complies with regulations and policies of the:</p> <p><i>Federal Trade Commission</i> http://www.ftc.gov/about-ftc/bureaus-offices/bureau-consumer-protection</p> <p>AND</p> <p><i>U.S. Food and Drug Administration</i> http://www.fda.gov/Food/IngredientsPackagingLabeling/LabelingNutrition/default.htm.</p> <p>Nutrition and health claims must be truthful, not misleading or deceptive, and include adequate disclaimers if appropriate.</p> <p>Health and nutrition information should align with the most up-to-date Dietary Guidelines.</p>
Insurance and Indemnification	<p><i>Allowable</i> as indirect costs for insurance and indemnification.</p>
Lobbying	<p><i>Unallowable</i> as defined in 2 CFR § 200.450.</p>
Meals	<p><i>Unallowable</i> for business meals when individuals decide to go to lunch or dinner together when no need exists for continuity of a meeting. Such activity is considered an entertainment cost.</p> <p><i>Unallowable</i> for breakfasts for conference attendees because it is expected these individuals will have sufficient time to obtain this meal on their own before the conference begins in the morning.</p> <p><i>Unallowable</i> for meal costs that are duplicated in meeting participant’s per diem or subsistence allowances.</p> <p><i>Allowable</i> for lunch or dinner meals if the costs are reasonable and a justification is provided that such activity maintains the continuity of the meeting and to do otherwise will impose arduous conditions on the meeting participants.</p> <p><i>Allowable</i> for meals consumed while in official travel status. They are considered per diem expenses and should be reimbursed in accordance with the organization’s established written travel policies.</p>
Memberships, Subscriptions, and Professional Activity Costs	<p><i>Unallowable</i> for costs of membership in any civic or community organization.</p> <p><i>Allowable</i> for costs of membership in business, technical, and professional organizations.</p>

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Organization Costs	<p><i>Unallowable</i> for costs of investment counsel and staff and similar expenses incurred to enhance income from investments.</p> <p><i>Allowable</i> with prior approval for organization costs per 2 CFR § 200.455.</p>
Participant Support Costs	<p><i>Allowable</i> for such items as stipends or subsistence allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with approved conferences, training projects, and focus groups.</p>
Political Activities	<p><i>Unallowable</i> for development or participation in political activities in accordance with provisions of the Hatch Act (5 U.S.C. §§ 1501-1508 and 7324-7326).</p>
Pre-Award Costs	<p><i>Allowable</i>, if such costs are necessary for efficient and timely performance of the scope of the project work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award.</p> <p>A recipient may incur pre-award costs up to 90 calendar days before SCBGP makes the award without prior approval from SCBGP. Expenses more than 90 calendar days pre-award require SCBGP prior approval. All costs incurred before SCBGP makes the award are at the applicant's risk. The incurrence of pre-award costs in anticipation of an award imposes no obligation on SCBGP to award funds for such costs.</p>
Printing and Publications	<p><i>Allowable</i> to pay the cost of preparing informational leaflets, reports, manuals, and publications relating to the project; however, the printing of hard copies is discouraged given the prevalence of electronic/virtual publication means</p>
Rearrangement and Reconversion Costs	<p><i>Allowable</i> as indirect costs incurred for ordinary and normal rearrangement and alteration of facilities.</p> <p><i>Allowable</i> as direct costs with prior approval for special arrangements and alterations costs incurred specifically for the award. Rearrangement and reconversion costs are those incurred in restoring or rehabilitating the non-Federal entity's facilities to approximately the same condition existing immediately before the start of the grant agreement, less costs related to normal wear and tear.</p>
Salaries and Wages	<p><i>Allowable</i> as part of employee compensation for personnel services in proportion to the amount of time or effort an employee devotes to the grant-supported project or program during the period of performance under the Federal award, including salaries, wages, and fringe benefits. Such costs must be incurred under formally established policies of the organization, be consistently applied, be reasonable for the services rendered, and be supported with adequate documentation.</p> <p>Salary and wage amounts charged to grant-supported projects or programs for personal services must be based on an adequate payroll distribution system that documents such distribution in accordance with generally accepted practices of like organizations.</p>

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	<p>Standards for payroll distribution systems are contained in the applicable cost principles (other than those for for-profit organizations).</p> <p><i>Unallowable</i> for salaries, wages, and fringe benefits for project staff that devote time and effort to non-specialty crop specific venues, tradeshow, events, meetings, programs, conventions, symposia, seminars, etc. where costs cannot be specifically identified and easily and accurately traced to activities that solely enhance the competitiveness of specialty crops.</p> <ul style="list-style-type: none"> • Example: Salaries and wages for a farmers’ market manager to manage and advertise a farmers’ market that includes non-specialty crop items are unallowable, while salaries and wages for personnel to conduct a cooking demonstration on how to prepare fruits and vegetables are allowable.
<p>Selling and Marketing Costs – Promotion of an Organization’s Image, Logo, or Brand Name</p>	<p><i>Unallowable</i> for costs designed solely to promote the image of an organization, general logo, or general brand rather than eligible specialty crops.</p> <ul style="list-style-type: none"> • A promotional campaign to increase sales of “STATE/COUNTY Grown” Watermelon is acceptable while increasing brand awareness of “XYZ Grown” generically is not. • Promoting tomatoes while including an organization’s logo in the promotion is acceptable, while generally promoting an organization’s logo is not. • Promotional items could say “Buy STATE/COUNTY Grown Apples” but not “XYZ Grown”, which promotes XYZ generically. • A promotional campaign to increase producer sales of “STATE/COUNTY Grown fruits and vegetables” is acceptable while increasing membership in “STATE/COUNTY Grown” generically is not.
<p>Selling and Marketing Costs – Promotion of Venues that do not Align with Grant Program Purpose</p>	<p><i>Unallowable</i> for costs for promotion at non-specialty crop specific venues, tradeshow, events, meetings, programs, conventions, symposia, seminars, etc.</p> <ul style="list-style-type: none"> • Advertisements could say “Buy Sweet Corn! It is the Best!” but not “Buy Local!” • Advertising educational sessions at a conference that solely benefits specialty crop growers are acceptable, while advertising a non-specialty crop specific local food conference is not.
<p>Selling and Marketing Costs – Promotional Items, Gifts, Prizes, etc.</p>	<p><i>Unallowable</i> for promotional items, swag, gifts, prizes, memorabilia, and souvenirs.</p>
<p>Selling and Marketing Costs – Coupons, Incentives or Other Price Discounts</p>	<p><i>Unallowable</i> for costs of the value of coupon/incentive redemptions or price discounts (e.g., the \$5.00 value for a \$5.00 clip-out coupon).</p> <p><i>Allowable</i> for costs associated with printing, distribution, or promotion of coupons/tokens or price discounts (e.g., a print advertisement that contains a clip-out coupon) as long as they benefit more than a single program or organization.</p>

Item	Description
Selling and Marketing Costs – Food for Displays, Tastings, Cooking Demonstrations	<i>Allowable</i> for food for displays, tastings, and cooking demonstrations with prior approval.
Selling and Marketing Costs – General Marketing Costs	<p><i>Unallowable</i> for costs designed solely to promote the image of an organization, general logo, or general brand.</p> <p><i>Allowable</i> for costs designed to promote products that align with the purpose of the grant program.</p>
Selling and Marketing Costs – Sponsorships	<p><i>Unallowable</i> for costs associated with sponsorships. A sponsorship is a form of advertising in which an organization uses grant funds to have its name and/or logo associated with certain events and where the organization does not necessarily know how the funds associated with sponsorship costs will be used. These costs also only benefit the organization offering funding, limiting the beneficiaries to the sponsor organization.</p> <p><i>Unallowable</i> for the costs associated with fees for individuals or companies to have their specialty crop products placed at retail markets (i.e., slotting fees or allowances).</p>
Selling and Marketing Costs – Use of Meeting Rooms, Space, Exhibits for Non-Specialty Crop Activities	<p><i>Unallowable</i> for costs associated with the use of trade shows, meeting rooms, displays, demonstrations, exhibits, and the rental of space for activities that do not solely promote specialty crops.</p> <ul style="list-style-type: none"> • Supporting the participation of raspberry and blueberry producers at a non-specialty crop specific international trade show to promote berries to an international audience is allowable, while renting a booth space for berry producers as well as wheat producers at an international trade show is not allowable. • Supporting the participation of farmers’ market managers at a national conference that is not specific to specialty crops is not allowable. • Supporting a portion of a national conference that is not specific to specialty crops is not allowable, while supporting a session on specialty crops at a national conference that is not specific to specialty crops is allowable. • Funding an “XYZ State Grown” booth at a specialty crop-specific venue where all exhibitors in the booth are specialty crop producers is allowable, but funding an “XYZ Grown” booth at a non-specialty crop specific venue is not allowable.
Selling and Marketing Costs – Cookbooks, Cooking	<i>Unallowable</i> for costs of separate complementary non-specialty crop products. A separate complementary non-specialty crop product means a product closely

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Demonstrations, Recipe Cards, Food Pairings	<p>associated with a specialty crop product, the purchase of one encouraging consumers to buy the other (i.e., cheese and wine).</p> <p><i>Allowable</i> for costs promoting the specialty crops in processed products (products prepared or created for the purposes of promoting a specialty crop but that require other ingredients are considered a processed product). A processed product is defined as a product that consists of more than 50% of the specialty crop by weight, exclusive of added water.</p>
Supplies and Materials, Including Costs of Computing Devices	<p><i>Allowable</i> for costs incurred for materials, supplies, and fabricated parts necessary to carry out a Federal award. Purchased materials and supplies must be charged at their actual prices, net of applicable credits. Withdrawals from general stores or stockrooms should be charged at their actual net cost under any recognized method of pricing inventory withdrawals, consistently applied. Incoming transportation charges are a proper part of materials and supplies costs. Only materials and supplies actually used for the performance of a Federal award may be charged as direct costs.</p> <p>A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the applicant or subapplicant for financial statement purposes or \$5,000, regardless of the length of its useful life. In the specific case of computing devices, charging as direct cost is allowable for devices that are essential and allocable, but not solely dedicated, to the performance of a Federal award. Where Federally-donated or furnished materials are used in performing the Federal award, such materials will be used without charge.</p>
Training	<p><i>Allowable</i> when the training is required to meet the objectives of the project or program, including training that is related to Federal grants management.</p>
Travel – Domestic	<p><i>Allowable</i> when the training is required to meet the objectives of the project or program, including training that is related to Federal grants management.</p>
Travel – Government Officials	<p><i>Allowable</i> with prior approval for government officials per 2 CFR § 200.444.</p>
Travel – Foreign	<p><i>Allowable.</i></p> <p>Foreign travel includes any travel outside the United States, and any United States territories and possessions. However, the term “foreign travel” for a U.S. governmental unit located in a foreign country means travel outside that country. Projects must provide justification for the travel. AMS recommends that recipient search the Foreign Agricultural Service database of GAIN reports (http://gain.fas.usda.gov/Pages/Default.aspx) to ensure that proposals will not duplicate information that already exists.</p>