

Integrating Activities for Advanced Communities



D1.19 – Road map report for the future

Project No.730938– INTERACT

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RE	Restricted to a group specified by the Consortium (including the Commission Services)	
CO	Confidential, only for members of the Consortium (including the Commission Services)	

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Publishable Executive Summary

INTERACT has been funded through the EU 7th Framework Programme and the Horizon2020 from 2011 until present. During this time the network has doubled in size and now consists of 88 terrestrial research stations located in all Arctic countries and adjacent high-alpine and boreal area. The INTERACT research stations host more than 15,000 scientists per year and with ongoing climate change the need for more knowledge from the Arctic is constantly increasing. INTERACT has during this project decided on two paths for the future to ensure a long-term sustained network; 1) continue to apply for external funding 2) establish a non-profit organisation. In 2019, INTERACT was awarded a new Horizon2020 grant for the period 2020-2023 and on the 19th of August 2020, the INTERACT non-profit organisation was inaugurated.

1. Introduction

INTERACT has been funded through the EU 7th Framework Programme and the Horizon2020 from 2011 until present. During this time the network has doubled in size and now consists of 88 terrestrial research stations located in all Arctic countries and adjacent high-alpine and boreal area. The INTERACT research stations host more than 15,000 scientists per year and with ongoing climate change the need for more knowledge from the Arctic is constantly increasing. INTERACT has during this project decided on two paths for the future to ensure a long-term sustained network; 1) continue to apply for external funding 2) establish a non-profit organisation.

2. External Funding - INTERACT III

During the 2nd General Assembly meeting (in Salekhard, Russia 24-28 September 2018) the General Assembly gave the INTERACT Coordinator and the Daily Management Group a mandate to submit an application to an open EU Call: H2020-INFRAIA-2019-1. In March 2019 a proposal including 63 partners was submitted and it was later granted by the EU. A new Grant Agreement (no. 871120) was signed on 6th February, 2020: a 4 years project (INTERACT III) starting on 1st January 2020 with 10M€ budget (Figure 1).



Figure 1. The INTERACT Consortium was funded for a third phase starting the 1st of January 2020.

3. INTERACT non-profit Association

3.1. Why create an INTERACT non-profit legal entity?

INTERACT is a highly successful network of more than 80 terrestrial research stations in the Arctic and far north that annually hosts around 15,000 researchers from around the World. It provides coordination and infrastructure for research and monitoring and is providing access to the Arctic for thousands of scientists from the global community. It is the major research infrastructure network on land in the North and has global recognition.

INTERACT operates in a part of the World experiencing rapid environmental, sociological and geopolitical changes that have far-reaching implications of global concern. INTERACT has time limited funding mainly from EU, but with contributions from Canada and US. INTERACT originated as an EU project and it has operated since 2001 but each four years a re-submission to continue the project is required and long-term funding is uncertain. The long-term function of the infrastructure is critical as the processes underpinning environmental change in the North need to be seen in a long-term. We therefore seek a way in which INTERACT can continue to play a major global role based on new funding sources.

To secure a more long-term economic sustainability of INTERACT and to allow for extending its activities beyond what can be done through EU-funding, INTERACT wants to establish an international non-profit organization with an income based on private and public contributions from funds, donations etc.

We also hope that this non-profit legal entity will help us making INTERACT a true circum-arctic player, by making it easier for us to include non-EU partners (i.e. Russian, North American and others) in the network on more or less the same conditions as the European partners.

3.2. Aims of the non-profit legal entity

It is important to many sectors of society, including the research community, northern populations, industry, decision makers and the general public that INTERACT continue its work and its science diplomacy roles without interruptions and without major uncertainties. We therefore seek to create a funding model based on a non-profit organisation that allows INTERACT to seek funding internationally and to continue its major roles of:

- Supporting and facilitating research groups to access the Arctic and northern areas in general
- Supporting and facilitating the networking of northern research stations to improve sharing of data, experience, standardized observations and human capital
- Providing a one stop shop for the terrestrial Arctic to the global science community including researchers, scientific programs, networks and organisation
- Making decision makers, local people and the global community aware of Climate Change and environmental issues in the Arctic
- Supporting education at all levels from primary schools to PhD courses both at the home institutions and in the field
- Other...

3.3. Which Organization type?

Non-Profit Association

It has a legal personality and it can acquire rights and assume liability (similar to economic associations).

A members' meeting is due once a year and an administrative body, usually a Board, is elected to take operative decisions. It's free to organize itself to suit its purpose and activities. To form an association (in Sweden), it's mandatory to:

- sign an agreement of co-operation by 2 or more legal or natural persons;
- the agreement must be formalized by adoption of a charter, including name and objective of the association;
- a board must be appointed.

It is not mandatory, but it could be registered with the Companies Registration Office.

Foundation

It is not an association, so it has no members. Its aim is to promote the objective chosen by the founder, on a long-term basis. It requires a "Founder" that would transfer part of his/her own property to the foundation for a specific purpose. In some cases these properties must be valuable enough to keep the foundation functioning for at least 5-6 years.

To form a foundation (in Sweden), the Founder/s sign a formation document, specifying the intent to create a foundation and to separate certain property, that must be used for a specific purpose.

The foundation must be registered with one of the country administration boards.

Compared to association, it has more duties: statutory registration and supervision by the authorities.

Tax rules

Generally speaking, the same tax rules are applicable to legal persons and non-profit legal entities. However, if it has a public utility purpose (in Sweden) a non-profit legal entity can qualify for a partial tax exemption and only pay taxes on income derived from real property or commercial business (if any).

They consider public utility promoting, among others:

- Culture;
- Environmental care;
- Education;
- Scientific research;
-

In addition, to qualify for the partial tax exemption the organization's activities must exclusively be attributable to the qualifying purpose (at least 90-95% of its annual revenue).

Final decision

After a thorough discussion about pros and cons of the 2 possible structures, the INTERACT Daily Management Group proposed to establish a non-profit Membership Association in Sweden. This proposal was agreed by all INTERACT partner during the 2rd General Assembly meeting (Vindeln, Sweden 10-13 September 2019).

3.4. Road Map to the non-profit Association

We can identify 4 phases:

- **IDEA**
Define nature of organization (*Member's Association*)
Choose the country (*Sweden*)
Fulfill a compelling Mission: Purpose, Service, Beneficiaries
Figure out a Vision: *how will the world look like if we'll get our mission?*
- **START-UP** (*done on 19th August 2020*)
Establish a legal entity (by an initial group of members)
Sign an agreement of co-operation between founder members (*Inaugural Meeting Minutes*)
Adoption of a charter including name and objective of the association (*Statutes*)
Appoint a Board still on a voluntary base (*Founding Board*)
- **GROWTH** (*current phase*)
Set up a Governance:
 Effective Board (establish policy, earn and maintain public trust, lead strategy, ensure resources and plan programs, make a self-evaluation)
 Membership campaign
 Management qualified staff (daily activities, fund raising, accounting and tax return)
New members enrollment
Start high quality, well regarded and relevant Programs
Fundraising activities
 Governmental/public funding, EU grants, ...
 Earned income (membership, product/service fees, ...)
 Private giving (individual donors, institutional philanthropic foundation/corporation, ...)
 Fundraising events
- **MATURITY** (*by the end of INTERACT III*):
 Public reputation (of the non-profit association) established
 Solid finance, adequate facilities and several revenue streams
 Grant external activities (TA calls funded by the non-profit organisation...)

3.5. How to operate the non-profit Association

INTERACT (as a network) will continue to apply through the normal research and infrastructure channels for short term funding. In case of successful application, EU will continue to grant INTERACT as a consortium, in order to achieve specific aims, as required by the EU calls. INTERACT non-profit organisation, being based in Europe, could be a partner of the EU project's Consortium and perform tasks that are strictly related to its mission.

In addition, INTERACT non-profit organisation should be able to seek funding directly from external sources in various countries, all around the world. The earnings of the INTERACT Foundation will mainly come from:

- (i) membership fees
- (ii) grants from public funding agencies in Europe, North America, Russia and elsewhere
- (iii) donations raised from private foundations

- (iv) contributions from individual donors
- (v) commissions from agencies, business and government departments
- (vi) new INTERACT publications (not granted by EU)
- (vii) fundraising activities

Funds will be managed directly by the INTERACT non-profit organisation, that could also involve network members in performing specific programs (*the operative guidelines should be defined in the co-operation agreement*).

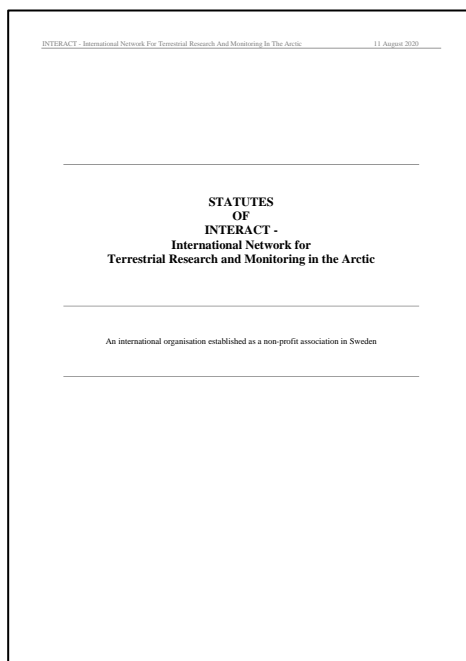
In particular funds should be used (after the end of H2020-INTERACT III project) to:

- Organize Networking activities, such as the SMF (Station Manager Forum) and cover logistics expenses.
- Reimburse travel and subsistence costs to the Station Managers attending the SMF
- Reimburse travel/subsistence costs to INTERACT Ambassadors for presenting INTERACT network at international conferences and meetings with decision makers and stakeholders
- Manage Access Calls (selected research projects in the Arctic will be granted, by covering travel/subsistence costs of participants and reimbursing a lump sum to the hosting Stations)
- Editing, printing and distributing INTERACT publications
- Perform general Dissemination activities (website maintenance and updating, social media, newsletters, ...)
- Perform Fundraising Activities worldwide
- Support specific Joint Research development
- Develop and deliver educational programs
- Pay salaries (secretariat, management staff), attendance fee (INTERACT Ambassadors, Board members, ...)
- Contractual payments to network members involved in specific program/activities
- Consultancy and general bills
- Taxes

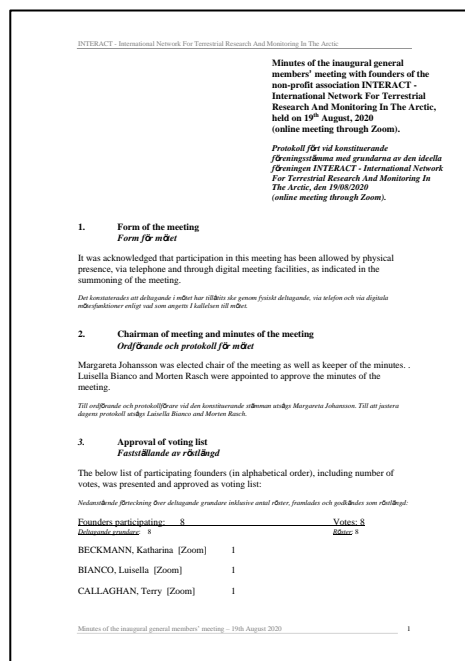
3.6. INTERACT non-profit Association – Statutes and Internal Policy

On 19th August 2020 the INTERACT international non-profit Association has been established in Sweden by 8 founders, as described in the Inaugural Meeting Minutes.

A Statutes has been approved and the 1st Board has been elected.



INTERACT - International Network For Terrestrial Research And Monitoring In The Arctic **Statutes**



Minutes of the Inaugural general members' meeting

3.7. Our Mission

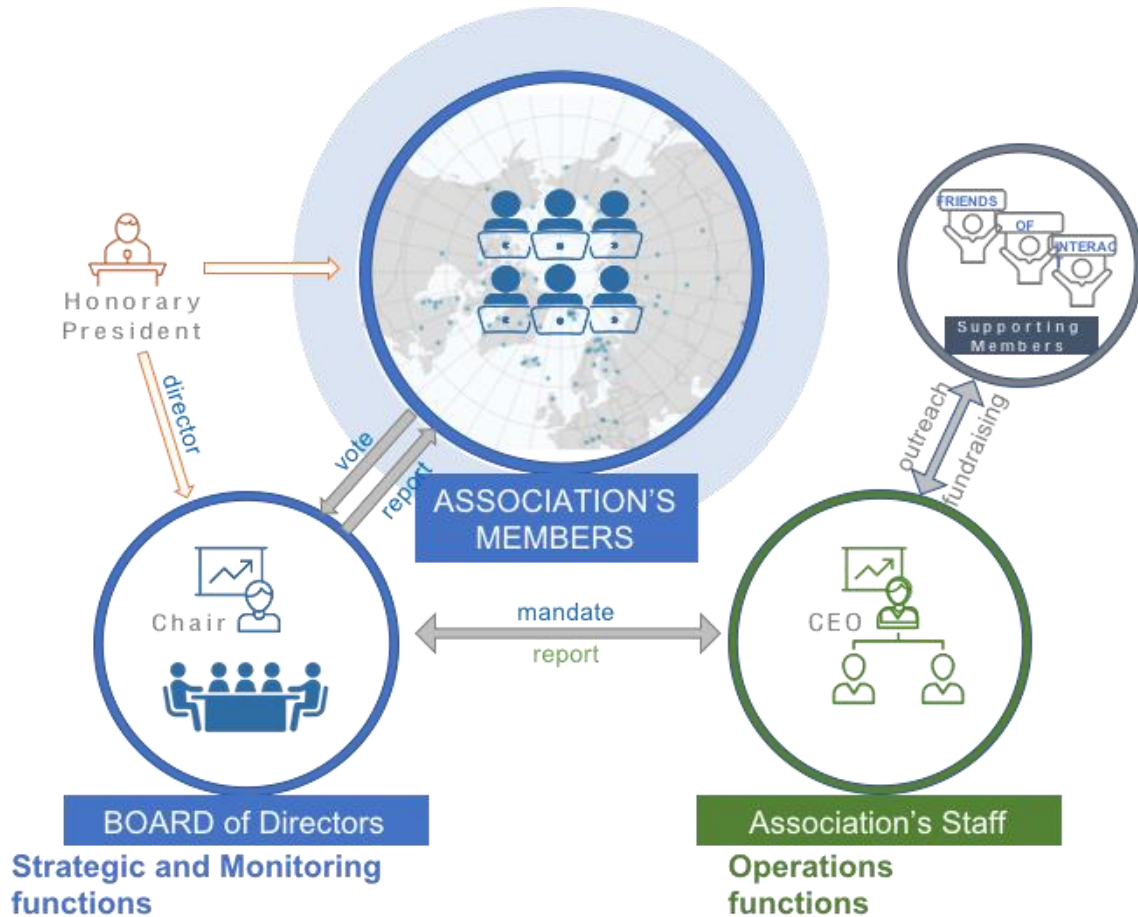
The Mission of the established INTERACT non-profit association is the following:

"INTERACT is a network of terrestrial research stations in the Arctic, sub-Arctic, boreal and alpine regions that annually hosts thousands of researchers from around the world. It is the major research infrastructure network on land in the North and has global recognition.

The purpose of the Association "INTERACT" is to support the use and operational procedures of infrastructures in Arctic, sub-Arctic, boreal and alpine regions, to support research and scientific development in the field of climate change and environment, and to increase general awareness about these topics within the general public and among politicians and decision makers."

3.8. INTERACT non-profit Association Structure

The Statutes describes the main rules and the structures of the non-profit Association, as it's shown below:



Components	Role
Station (Members) legal entities that run a scientific research station in the Arctic, sub-Arctic, boreal or alpine areas fulfilling the following criteria: <ul style="list-style-type: none"> (i) Be long term and stable; (ii) have multiple and multidisciplinary activities; (iii) be able to host guest scientists at their own expense (iv) actively support the objectives and purpose of INTERACT. 	Apply for membership ; Appoint a Representative (and one alternate or a proxy) to attend the Association's Members' Meeting (each member of the Association has one (1) vote); Pay an annual membership fee ; Notify the Chair of the Board in case of resignation.

<p>Member's Representative (a Station Manager relevant to the Association's purpose or an alternate with responsibility for the management of the member's station)</p>	<p>Attend Association's Members' Meeting (annual/extraordinary); Elect the Board of Directors and its Chairperson; Approve Annual Report, Profit and Loss statement and the Balance Sheet and any other agenda's topic that requires a decision; Approve Statutes' amendment (2/3 majority required); Discharge from liability of the member of the Board and the CEO; Vote for Liquidation and dissolution of the Association (3/4 majority required)</p>
<p>Board of Directors Board members are elected at the annual Association's members' meeting. It shall consist of not less than three (3) and not more than nine (9) board members with a maximum of three (3) alternates</p>	<p>To form a quorum at least half of the elected Board Members must participate at a Board meeting. Resolutions of the Board are taken by simple majority votes, unless otherwise stipulated herein.</p>
<p>Director(s) (i) an employee of a legal entity which is a member of the Association and a current or former manager of a Research Station; OR (ii) a person who has contributed to the management of INTERACT projects at the consortium level (DMG); OR (iii) a major Stakeholders' representative, including external individuals who may substantially contribute to the objectives of the Association.</p>	<p>Participate to the Board meeting At the Board meeting, vote about*: <ul style="list-style-type: none"> - Membership application approval - Internal Governance - Procedures and instructions for the use of funds - Fundraising activities - Budget and association's plan for the next period (a year?) - Extraordinary activities/expenses They prepare members' meetings and supporting documentation</p>
<p>Honorary President (Terry Callaghan)</p>	<p>He has a seat in the Board (no election needed)</p>
<p>Chief of Operation (CEO) (to avoid conflict of interest, the CEO should not be elected as a Board Director)</p>	<p>Assures that the Board decisions will be implemented, following the approved plan and budget. Coordinates the Association's operations and its staff Constantly reports to the Chair of Board If required, participates to the Board (for giving advice and reporting. Cannot vote)</p>
<p>Staff</p>	<p>A secretary at least and a CFO (<i>maybe at interim</i>) Additional employees, depending on activities (and available budget) <i>Temporary collaboration with Station Manager and Board's Directors will also be done</i></p>

Auditor and Accountant	Audit the accounting Support the CFO (or directly take care of the finance and bookkeeping) If required, participate to the Board (for giving advice and reporting)
Supporting Members <i>"Friends of INTERACT"</i> A person or legal entity that wishes to support INTERACT but does not fulfil the formal membership requirements or does not wish to become a member	No voting rights or other membership rights. <i>They cannot affect INTERACT operations but they can give advice and represent us in their areas when appropriate</i>
Sponsors and Donors A person or legal entity that donates money to INTERACT Association	No voting rights or other membership rights. One of them can be elected as Director in the Board

3.9. Historical cost – future budget

INTERACT, as a temporary consortium (from 9 to 65 partners), has been funded by the European Commission with around 30 M€ in 4 Infrastructure projects:

SCANNET (2001-2004).
4 years project

FP7-INTERACT I (2010-2015).
4 years project (7.366 Access days; 71 Stations network) + 1 year extension (mainly networking activities)

H2020-INTERACT II (2016-2021), in progress
4 years project (7.888 Access days; 83 Stations network) + 1 year extension (mainly Access activities)
overlapping INTERACT III

H2020-INTERACT III (2020-2023), in progress
4 years project (6.495 Access days; 88 Stations network)

An overview of claimed (SCANNET, INTERACT I, INTERACT II) and planned costs (INTERACT II, INTERACT III) is shown in the following table:

	2001-2004	2010-2015	2017-2021	2020-2023	
	Scannet	Interact I	Interact II	Interact III	TOTAL
Project Management	212.580	958.160	973.637	744.948	2.889.325
TA management		319.706	461.096	593.830	1.374.631
ACCESS cost (TA/RA)		2.519.821	3.375.197	2.947.904	8.842.923
Networking (effort and travel)		160.555	328.736	295.398	784.690
Stations manager (effort + editing)		629.310	716.923	874.586	2.220.819
Stations manager (partner travel)		171.873	401.310	402.229	975.411
Other project costs (JRA, OH)	700.344	4.319.711	3.743.101	4.141.105	12.904.261
	912.924	9.079.135	10.000.000	10.000.000	29.992.059

In order to define a budget for INTERACT non-profit organisation, we should include costs directly related to:

- i) Managing Access call and grant (TA management)
- ii) ACCESS costs, (access unit cost, travel and subsistence costs),
- iii) Networking activities (INTERACT's ambassadors)
- iv) Stations network (Station Manager Forum, INTERACT's Publications, SM travel costs)

Any other costs (research activities, Overhead) will be excluded from the non-profit organisation's budget. The following table shows the most updated value for each cost category (based on INTERACT III budget):

	Estimated costs	
ACCESS cost	454	/day
TA management	148.458	/year
Networking (effort and travel)	73.850	/year
SMF(mng; editing)	218.647	/year
SMF(SM travel)	1.828	/year for station

Project Management costs have been excluded, being related to the whole project monitoring, including activities not relevant for the non-profit organisation.

They have been calculated by applying a flat rate (15%) to other direct costs.

An additional 10% for covering other administrative costs will also be added

INTERACT Non-Profit organisation's budget

If we plan to maintain the actual INTERACT network as it is now, we have to cover at least the following annual costs:

	Estimated costs		Projected costs		
Networking (effort and travel)	73.850	/year	73.850		
SMF(mng; editing)	218.647	/year for station	218.647		
SMF(SM travel)	1.828	/year for station	160.892	88	Research Stations
Project Management			68.008	15%	of other direct costs
OH			45.339	10%	of direct costs
			447.546		

Our mission is to continue providing (and granting) Access to INTERACT stations, too.

If the INPO was able to grant 1.000 Access days per year (EU funded INTERACT III will grant around 1.600 days/year), our costs would increase to:

	Estimated costs		Projected costs		
ACCESS cost	454	/day	453.873	1.000	Access per year
TA management	148.458	/year	148.458		

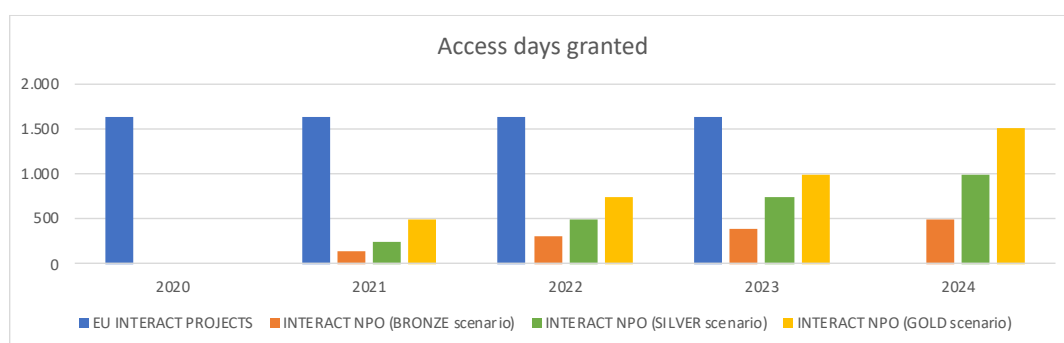
Networking (effort and travel)	73.850	/year	73.850		
SMF(mng; editing)	218.647	/year	218.647		
SMF(SM travel)	1.828	/year for station	160.892	88	Research Stations
Project Management			158.358	15%	of other direct costs
OH			105.572	10%	of other direct costs
			1.319.647		

Giving these values as a good estimate of the real costs, and assuming that:

- Stations will pay an annual fee (average value: 500€);
- Fundraising activities will be organized to raise public and private donations. Their cost has been planned from a minimum of 50k to a max of 20% of the fund raised during the previous year;
- Grant Agreement (funded by public agency) and commercial services will be signed for a 5% (BRONZE scenario), 10% (SILVER scenario) and 15% (GOLD scenario) of the total income;
- No taxes due on income from donation. Only commercial activities will pay tax accordingly to the Swedish law
- Supported activities (Access costs, Station Manager Forum, INTERACT Ambassador's and other mission driven activities) will be granted accordingly to the raised income.
- During the developing phase (from YR2 to YR4) it's been planned 0 costs for Station Manager Forum and TA Ambassadors, because these costs will be already covered by the signed EU grant (INTERACT II and III)
- Access days planned during the developing phase (from YR2 to YR4) will be in addition to the Access days already covered by the EU grant (INTERACT II and III). The TA management costs for these additional days will be estimated proportionally.
- Other mission-driven activities will be max 20% of the supported activities cost

We have developed 3 possible scenarios that will let INPO keep alive INTERACT's network and grant from 500 (BRONZE) to 1.500 (GOLD) Access days in 2024:

	ACCESS DAYS				
	developing phase				2024
	2020	2021	2022	2023	
EU INTERACT PROJECTS	1.624	1.624	1.624	1.624	0
INTERACT NPO (BRONZE scenario)	0	150	300	400	500
INTERACT NPO (SILVER scenario)	0	250	500	750	1.000
INTERACT NPO (GOLD scenario)	0	500	750	1.000	1.500



Let's consider the intermediate scenario (SILVER), that aims to 1.000 Access days granted in 2024
The next 5 yr budget could look as in the following table:

SILVER	YR1 (2020)	YR2 (2021)	YR3 (2022)	YR4 (2023)	YR5 (2024)
Incremental factors					
Membership (stations joining)	0	15	29	44	59
Access days granted	0	250	500	750	1.000
	YR1 (2020)	YR2 (2021)	YR3 (2022)	YR4 (2023)	YR5 (2024)
Income (€)					
Member fees (500€)	0	7.333	14.667	22.000	29.333
EU grant: Interact III [1]	0	20.000	20.000	20.000	
EU grant: Arctic Passion OH [1]	0	0	0	0	0
Other Commercial activities [1] (up to 10%)	0	7.948	28.397	53.972	144.211
FUNDRAISING target	2.000	244.201	420.902	643.747	1.268.565
DIRECT cost (mission driven activities)					
INTERACT Ambassador [2]	0	0	0	0	-45.474
Station Manager Forum (mng;editing)	0	0	0	0	-134.635
Station Manager Forum (station)	0	0	0	0	-107.261
Access Grant [3]	0	-113.468	-226.936	-340.405	-453.873
TA management	0	-22.854	-45.707	-68.561	-91.415
Fundraising and outreach [4]	0	-50.000	-50.000	-84.180	-128.749
Other mission driven activities [5]	0	-37.264	-64.529	-98.629	-192.281
Indirect costs [6]					
Managing staff	-2.000	-34.748	-70.396	-115.133	-239.331
Consultants (bookkeeping, other)	0	-15.000	-15.750	-16.538	-17.364
Tax (22% commercial activities)	0	-6.149	-10.647	-16.274	-31.726
Income (€)	2.000	279.483	483.966	739.719	1.442.110
Costs (€)	-2.000	-279.483	-483.966	-739.719	-1.442.110

- [1] Income from GA and other commercial activities (10% of the Income)
 [2] Travel and subsistence costs for networking activities
 [3] Access granted by the Association (not covered by EU)
 [4] 20% of the previous year raised fund (min 50K)
 [5] 20% of other supported activities
 [6] 25% of direct costs

In the following 2 tables we will show also the BRONZE (500 Access days in 2024) and the GOLD (1.500 Access days in 2024) possible budget:

BRONZE	YR1 (2020)	YR2 (2021)	YR3 (2022)	YR4 (2023)	YR5 (2024)
Incremental factors					
Membership (stations joining)	0	9	18	23	29
Access days granted	0	150	300	400	500
	YR1 (2020)	YR2 (2021)	YR3 (2022)	YR4 (2023)	YR5 (2024)
Income (€)					
Member fees (500€)	0	4.400	8.800	11.733	14.667
EU grant: Interact III [1]	0	20.000	20.000	20.000	
EU grant: Arctic Passion OH [1]	0	0	0	0	0
Other Commercial activities [1] (up to 5%)	0	0	0	732	36.957
FUNDRAISING target	2.000	173.290	291.579	382.181	687.523
DIRECT cost (mission driven activities)					
INTERACT Ambassador [2]	0	0	0	0	-22.737
Station Manager Forum (mng, editing)	0	0	0	0	-67.317
Station Manager Forum (station)	0	0	0	0	-53.631
Access Grant [3]	0	-68.081	-136.162	-181.549	-226.936
TA management	0	-13.712	-27.424	-36.566	-45.707
Fundraising and outreach [4]	0	-50.000	-50.000	-58.316	-76.436
Other mission driven activities [5]	0	-26.359	-42.717	-55.286	-98.553
Indirect costs [6]					
Managing staff	-2.000	-20.138	-43.926	-61.831	-122.334
Consultants (bookkeeping, other)	0	-15.000	-15.750	-16.538	-17.364
Tax (22% commercial activities)	0	-4.400	-4.400	-4.561	-8.131
Income (€)	2.000	197.690	320.379	414.646	739.147
Costs (€)	-2.000	-197.690	-320.379	-414.646	-739.147

[1] Income from GA and other commercial activities (5% of the Income)

[2] Travel and subsistence costs for networking activities

[3] Access granted by the Association (not covered by EU)

[4] 20% of the previous year raised fund (min 50K)

[5] 20% of other supported activities

[6] 25% of direct costs

GOLD	YR1 (2020)	YR2 (2021)	YR3 (2022)	YR4 (2023)	YR5 (2024)
Incremental factors					
Membership (stations joining)	0	29	44	59	88
Access days granted	0	500	750	1.000	1.500
	YR1 (2020)	YR2 (2021)	YR3 (2022)	YR4 (2023)	YR5 (2024)
Income (€)					
Member fees (500€)	0	14.667	22.000	29.333	44.000
EU grant: Interact III [1]	0	20.000	20.000	20.000	
EU grant: Arctic Passion OH [1]	0	10.000	0	20.000	20.000
Other Commercial activities [1] (up to 15%)	0	42.595	89.869	109.716	297.879
FUNDRAISING target	2.000	396.704	600.591	819.059	1.757.317
DIRECT cost (mission driven activities)					
INTERACT Ambassador [2]	0	0	0	0	-68.211
Station Manager Forum (mng, editing)	0	0	0	0	-201.952
Station Manager Forum (station)	0	0	0	0	-160.892
Access Grant [3]	0	-226.936	-340.405	-453.873	-680.809
TA management	0	-45.707	-68.561	-91.415	-137.122
Fundraising and outreach [4]	0	-50.000	-79.341	-120.118	-163.812
Other mission driven activities [5]	0	-64.529	-97.661	-133.081	-282.559
Indirect costs [6]					
Managing staff	-2.000	-65.822	-106.571	-150.147	-336.541
Consultants (bookkeeping, other)	0	-15.000	-15.750	-16.538	-17.364
Tax (22% commercial activities)	0	-15.971	-24.171	-32.938	-69.933
Income (€)	2.000	483.966	732.460	998.109	2.119.196
Costs (€)	-2.000	-483.966	-732.460	-998.109	-2.119.196

[1] Income from GA and other commercial activities (15% of the Income)

[2] Travel and subsistence costs for networking activities

[3] Access granted by the Association (not covered by EU)

[4] 20% of the previous year raised fund (min 50K)

[5] 20% of other supported activities

[6] 25% of direct costs