

## Sandia National Laboratories – Sponsored Cost Expense & Approval Reminders

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Sandia National Laboratories/Sandia Corporation (“Sandia”) awards include sponsor-specific requirements related to foreign travel, equipment, budget management, documentation, and other sponsored costs. This guide provides key compliance considerations for Principal Investigators and Grant Managers responsible for managing Sandia awards.

Sandia reviews may include detailed examination of sponsor approvals and supporting documentation. Maintaining appropriate documentation and confirming sponsor requirements before costs are incurred can help prevent questioned or potentially unallowable costs and support audit readiness throughout the life of the award.

### Quick Compliance Reminders:

When managing a Sandia award, keep these five principles in mind:

- **Check the award first.** Confirm costs are consistent with the approved budget, contract terms, Statement of Work, and period of performance.
- **Don't rely on the \$5,000 equipment threshold alone.** Certain non-consumable or transferable items under \$5,000 may still require specific Sandia approval or treatment as equipment.
- **Confirm foreign travel before booking.** Review the contract and approved budget and obtain any required Sandia/DOE approvals in writing before travel. Significant changes to an approved trip may require re-confirmation.
- **Don't assume budget changes are automatically permitted.** Consult the Sandia Designated Representative (SDR) and Sandia Buyer (SB) before moving costs between categories, such as Materials & Supplies and Equipment, when sponsor authorization may be required.
- **Keep the documentation.** Retain sponsor approvals and supporting records with the award documentation and in Workday, as applicable.

When in doubt, ask before you spend. Resolving an approval or classification question before a cost is incurred is much easier than addressing a questioned cost later.

**Jump to:** [Foreign Travel](#) | [Equipment](#) | [Materials & Supplies](#) | [Tuition & Fringe](#) | [Period of Performance](#) | [Invoicing](#) | [Year-End Accrual Reporting](#) | [Budget Changes](#) | [Documentation](#)

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### **Foreign Travel – Check the Award Before You Travel**

Foreign travel is governed by the Sandia contract terms and approved budget. If foreign travel is not clearly authorized, or if the trip changes materially, obtain the required sponsor approvals before travel.

Before traveling:

1. Confirm the travel is allowable and supports the award's Statement of Work (SOW).
2. Confirm the trip is authorized under the contract/budget.
3. If approval is required, work with the Sandia Designated Representative (SDR) and Sandia Buyer (SB) to obtain the appropriate and Department of Energy (DOE) approval prior to travel. The DOE approval is essential.
4. Do not proceed until all required approvals are provided in writing.
5. Retain the approval documentation, travel authorization, receipts, and related communications with the award records/Workday.

Changes to the travel destination, number of travelers, conference dates, or other significant travel details should be communicated to the SDR and re-confirmed before travel.

### **Equipment – Classification, Ownership & Approval**

- Items \$5,000 or greater are generally treated as equipment under Georgia Tech's capitalization policy; however, Sandia contract terms and ownership provisions control.
- Equipment subject to Sandia ownership should be coordinated with the SDR and tracked by the department, including purchase price, contract reference, and location.
- For items under \$5,000, do not assume they can be treated as Materials & Supplies simply because they fall below Georgia Tech's capitalization threshold. Sandia has advised that non-consumable, transferable items such as computers and testing equipment should be specifically identified/approved and supported in the award documentation.
- If an item may be used beyond the project, confirm required approval for continued future use with the SDR/Sandia Buyer.
- Federally owned equipment is subject to Research Property tracking and applicable sponsor/federal disposition requirements at award completion.

### **Materials & Supplies (M&S)**

- Charge M&S based on the approved award budget, applicable contract terms, and the nature of the item.
- Pay particular attention to whether an item should be classified as M&S or equipment, particularly for non-consumable or transferable items.

## **Sandia National Laboratories – Sponsored Cost Expense & Approval Reminders**

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- Retain invoices and supporting documentation in accordance with Georgia Tech requirements. Georgia Tech maintains vendor invoices electronically, and procurement approvals are subject to applicable institutional thresholds.

### **Tuition & Fringe**

- Ensure tuition and fringe charges are consistent with the applicable award budget, institutional rates/policies, and the individual's appointment or effort on the award.
- Confirm that the underlying salary/appointment and effort are appropriately supported and that related charges are posted to the correct award and period.
- Retain supporting documentation needed to substantiate the charges, including applicable effort certification and payroll records.

### **Expenses Outside the Period of Performance**

- Do not charge costs to a Sandia award before the authorized start date or after the authorized end date unless specifically permitted by the award terms or sponsor approval.
- Pay particular attention to payroll, travel, and other costs when award project dates change or an award is approaching expiration.
- Ensure costs are supported by appropriate records, including effort certification, timesheets where applicable, invoices, receipts, and other documentation demonstrating that the cost relates to the authorized period and project.
- If an expense falls outside the approved period or project dates are changing, consult the SDR/Sandia Buyer before incurring or charging the cost.

### **Budget Changes**

Before making changes to an approved Sandia budget, including changes between budget categories such as M&S and Equipment, work with the SDR/Sandia Buyer to determine whether sponsor authorization is required. Do not assume that a change within the overall award budget is automatically permitted.

It is imperative that available funding by budget period and category is monitored. Sandia's invoicing portal may limit the amount available for billing within a particular fiscal year or funding category. PIs and Grant Managers should coordinate with the appropriate Sandia representatives regarding funding availability and any required prior-year funding carryover, rather than assuming unspent funds will automatically remain available for billing.

### **Invoicing**

Sandia generally expects invoices to be submitted monthly for allowable and allocable costs incurred on the award. Timely posting of effort and other expenses helps support accurate and current invoicing. To support the invoicing process:

## **Sandia National Laboratories – Sponsored Cost Expense & Approval Reminders**

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- Ensure salary, effort, and other award costs are recorded timely and charged to the appropriate award.
- Maintain and promptly provide supporting documentation for billed transactions, including receipts for Materials & Supplies (M&S), travel, and other direct costs. PIs and Grant Managers should ensure that travel expenses and the associated travelers can be readily identified and that supporting receipts are available when requested by G&C Accounting.
- Address questioned or potentially unallowable costs promptly, as disallowed costs may require invoice revisions and delay the billing process.
- Minimize adjustments to previously billed costs when possible. When a cost transfer involving a previously billed expense is necessary, ensure the adjustment is appropriately supported and documented.

### **Year-End Accrual Reporting**

Sandia requires reporting of anticipated total expenses by Purchase Order (PO)/award in advance of its September 30 fiscal year-end. Sandia uses this information to estimate unbilled expenses and support year-end accruals into its next fiscal year.

Grants & Contracts Accounting coordinates these requests using actual expenses, obligations, and commitments recorded in Workday and reflected in the Sponsored Award Budget Expense Report (SABER), along with information provided by PIs and Grant Managers. When supporting Sandia year-end accrual requests:

- Respond promptly to requests for accrual information, which are typically received during August and September.
- Ensure salary/effort and non-salary expenses are recorded timely, so current financial activity is accurately reflected.
- Provide anticipated total expenses when expected costs differ from amounts reflected in SABER, including notification when the full PO amount is not expected to be spent.
- Communicate relevant anticipated award activity, such as a pending No-Cost Extension, additional funding, or other changes that could affect projected expenses.

### **Documentation**

Please ensure that communications with the Sandia Designated Representative (SDR), Sandia Buyer (SB) and Department of Energy (DOE) regarding foreign travel and other sponsor-required approvals are documented in writing and retained with the award records within the department and uploaded within Workday.

## **Sandia National Laboratories – Sponsored Cost Expense & Approval Reminders**

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These steps are particularly important because Sandia will deny foreign travel costs when the required DOE approval is not documented, even when the travel was included in the approved budget or otherwise approved by the SDR and/or SB.

When in doubt, check the award terms first. If a cost is not clearly supported by the approved budget, contract terms, or applicable Georgia Tech policy, contact your Grant Manager/OSP and, when required, the Sandia Designated Representative (SDR) and Sandia Buyer (SB) before the cost is incurred.