GIT Grants and Contracts Accounting – Cost Transfer Exception Processing Operating Procedures Updated July 1, 2023

Background: Excerpt from G&C Policy 3.6 "Cost Transfers" – Cost Transfers Requiring Special Approval Authorization

All cost transfers are to be processed in a timely manner and properly documented. Cost transfers to externally-funded sponsored funds beyond 90 days of the original expense posting will not be allowed under normal circumstances. These exceptions are not applicable to Prior Year Salary Cost Transfers unless unique circumstances are involved and would be reviewed on a case by case basis. This document has been prepared to describe procedures used by the Grants and Contracts Accounting Office to review and approve exceptions to the 90-day Cost Transfer rule. All exceptions must be approved by the Executive Director of Grants and Contracts Accounting or a member of the Grants and Contracts Accounting team with delegated authority.

Allowable Exception Requests:

- 1. Initial or continuing sponsor funding is delayed beyond 90 days after the effective date of the applicable award performance period. If the transfer is requested within the reporting period of the sponsored award (typically 60-90 days after the expiration date of the award). If the terms and conditions of the sponsored agreement provide for acceptance and payment of the expenses covered by the proposed cost transfer and appropriate supporting documentation is provided.
- 2. Moving direct costs between grant lines on same sponsored award. Grant Line changes are still reviewed for appropriate allowability, allocation, and compliance with award requirements.
- 3. Correcting ledger accounts or spend categories on transactions within a sponsored award. These changes are still reviewed for appropriate allowability, allocation, and compliance with award requirements.
- 4. Transfers of direct costs <\$1,000 where an exception has been deemed acceptable by the Executive Director of Grants and Contracts Accounting or a member of the Grants and Contracts Accounting team with delegated authority and is clearly documented
- 5. Specific approval received by the sponsored agency of the award/grant receiving the charge
- 6. New award/grant established based on sponsor need such as a new task order, new PO# or Agency transition from pooled to award billing. The Scope of Work, PI, and core contract number remain the same.
- 7. Transfer of direct costs from one phase of award to another, where the Period of Performance overlaps. The P.I, Sponsor, and award deliverables must be consistent from award to award. Additional information may be requested from Grants & Contracts team member for conformity to policy.
- 8. Transfers to fixed price or Private/Industry awards where the costs are reported to be allowable and allocable to the award receiving the charge and adequate supporting documentation is provided

Actions Taken:

1. If transfers meets one or more of the "common exception requests" descriptions listed above, the Executive Director of Grants and Contracts Accounting is authorized to provide final approval of the 90-day Cost Transfer Request and submit the transfer request directly for processing.

2. All other exception request forms must be routed individually for appropriate next-level approvals as described in G&C Policy 3.6.

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