Sponsored Project Administration

**Procedure:** Non-Payroll Cost Transfers  
**Owner:** Sponsored Project Administration  
**Effective date:** 05/11/2018  
**Last Updated:** 05/11/2018

**Background**

The University of Vermont requires that all expenses and financial obligations made in support of federal and non-federal sponsored projects be charged to the appropriate project when incurred. There are a few situations when an expense should be transferred from the chart string where it was initially charged. In these cases, a cost transfer is generated to ensure the expense is appropriately re-allocated.

The Principal Investigator, and/or the Unit Administrator is responsible to review expenses on a consistent basis at least every 30 days to verify that all financial transactions are accurately and appropriately charged to the correct project. The guiding principles for allowable cost requirements are outlined in the Uniform Guidance (200.400 - Subpart E - Cost Principles).

If a transfer is deemed necessary after the review of expenses, it should be submitted and approved no more than 90 days from the accounting date in which the original expenditure has posted in the General Ledger. The National Institutes of Health includes within its Grants Policy Statement the guidelines to be followed in relation to cost transfers.

Cost transfers are not to be used as a means of managing costs on sponsored agreements. The purpose of a cost transfer is to correct errors in the processing of the original transaction; to move costs between awards for closely related work that is supported by more than one funding source, or to transfer pre-award costs to an award in accordance with the provisions of the award. At no time should a sponsored project be used as a holding account for any expenses that will then be transferred, pending the continuation, renewal, or modification of the project or the receipt of a new award. In these cases, an Advance Account should be established, per the Advance Account Procedure.

**Purpose**

The goal of this document is to outline the process for processing non-payroll cost transfers that require Sponsored Project Administration review and approval. Payroll cost transfers are the responsibility of Cost Accounting Services. Refer to the Cost Accounting Services website for information on processing payroll cost transfers.
Roles and Responsibilities

Principal Investigator
- Responsible for identifying the need for a cost transfer and requesting accordingly.
- Reviews award balances and transactions on a consistent basis to validate the expenses posted to the award during the previous period, as well as, all costs incurred to date on the project.
- Identifies expenses posted to the project in error.
- Works with the Unit Administrator to initiate the expense transfer and provide justification if necessary.
- Signs Late Cost Transfer Forms where applicable.

Unit Administrator
- Assists PI in the review of the project expenses on a consistent basis to identify charges posted in error.
- Primarily responsible for preparing and completing the cost transfer.
- Assists PI in collecting and providing necessary justification required to accompany the cost transfer request.
- Assists PI in identifying the appropriate destination chart string for the cost transfer when applicable.
- Reviews cost transfers for compliance with the University Operating Procedure on Cost Transfers.
- Creates and submit the journal entry in PeopleSoft along with the appropriate backup documentation.
- Monitors the progress of the cost transfer to ensure the journal gets posted in a timely manner. Contacts the appropriate SPA Financial Analyst with any issues.

SPA
- SPA Compliance Analyst runs a PeopleSoft query at a minimum twice a week to capture all journals awaiting SPA review and approval.
- SPA FA reviews and approves all cost transfers in a timely manner.
- SPA FAs works with Unit Administrators if any changes to the cost transfers are needed.
- SPA Director reviews and approves all late costs transfers.
- SPA Compliance Analyst posts all sponsored project cost transfer journals in PeopleSoft (IC-Journal and regular journal) once the cost transfers have been approved by FA and Director (if Director approval is necessary).

Definitions

Cost Transfer: The assignment of an expense or expenditure (charge) to a sponsored agreement that was initially recorded elsewhere in the University’s general ledger.

PeopleSoft: The University of Vermont financial system.

Monthly Budget Report: A detailed listing of revenue and expenses transactions that have posted up to the previous night to the general ledger.

Journal Tracker: SPA’s excel file of all pending journal entries that need approval.
Cost Transfer Justification Form: A form that captures details and justification of a cost transfer.

IC-journal: Interdepartmental billing journals-
https://www.uvm.edu/sites/default/files/media/journalentry.pdf

Advance Account: A process that allows a sponsored project chart string to be setup in PeopleSoft before a formal notice of award is accepted by the University.

SPA: Sponsored Project Administration

FA: Financial Analyst

PI: Principal Investigator

UA: Unit Administrator (For the purpose of all procedures, Business Unit Administrator, Business Manager, Grant Administrator and Department Administrator are all used interchangeably and refer to the person assisting the PI in the Department.)

Reasons for a Cost Transfer

Acceptable reasons for a cost transfer are:

- To correct an error (e.g. departmental or bookkeeping) on the original transaction, such as transposition of numbers or allocation of expense to the wrong project by staff.
- To move expenses being charged from a departmental discretionary account to a sponsored project account when an Advance Account was not established. (Please Note: Adequate and substantial justification is recommended when moving costs from a non-sponsored project to a sponsored project, as Advance Accounts are expected to be established to enable pre-spending on grant awards).
- Bulk purchases of lab supplies charged to a departmental or other non-sponsored accounts, then allocated to the appropriate research projects.

Unacceptable reasons for a cost transfer:

- To transfer costs from a sponsored project in deficit to another sponsored project for the sole purpose of eliminating the deficit.
- To transfer costs to a sponsored project to spend the remaining funds.
- To charge another sponsored project in anticipation of future funding for a new project.
- To charge a sponsored project for a bulk purchase then move costs to the appropriate project(s).

Transfers over 90 days:

- Only allowable under extenuating circumstances, which consist of:
  - Setup delays
  - Sponsor delays
  - Moving expenses off from a sponsored project onto departmental funds
  - Other circumstances outside of the departmental control
- SPA reserves the right to reject any late cost transfer that does not meet these expectations.
PI and UA Process

- The PI or UA discovers the expense(s) in question and initiates the cost transfer.
- The PI and UA verifies if the expense is allowable, reasonable, and allocable to the receiving award.
- Depending on the type of transfer, the appropriate backup will be needed. Refer to journal entry matrix for types of journal entries and backup needed for each type. **SPA Non-Payroll Cost Transfer Procedure Appendix B Journal Matrix**
- The PI or UA will prepare the Cost Transfer Justification Form and monthly budget report where the original charge is highlighted. As a reference, these are some helpful tips to assist with the preparation of the Cost Transfer Form. – **SPA Non-Payroll Cost Transfer Procedure Appendix A Tips for Form**
  - For cost transfers less than 90 days, the PI does not need to sign the Cost Transfer Justification Form and only questions 1 and 2 need to be answered. The form will be signed by the Initiator and one additional approver from the Unit.
  - For cost transfers over 90 days, the PI will need to sign the Cost Transfer Justification Form in addition to the preparer and approver, and all four questions need to be answered.
    - If the PI is unavailable to physically or electronically sign the form, an email approval for the Cost Transfer Form is acceptable. It will need to state the journal number and reason PI is unavailable.
  - On all DHHS (Non-NIH) projects, any cost transfer over 90 days, also requires sponsor’s approval. The UA will work with the SPA FA to obtain the prior approval from the sponsor prior to submitting the journal.
- The UA will obtain all necessary signatures.
- The UA will prepare the journal entry and edit the journal to confirm it passes the PeopleSoft budget checking.
  - If any errors exist, the UA will work with their SPA FA to assist with resolving the budget errors.
- Once the journal has passed the budget check, the UA will attach the signed Cost Transfer Justification Form (if applicable) and the monthly budget report to the journal.
- The UA will submit the journal in PeopleSoft.

SPA Process

- SPA Compliance Analyst will run a query in PeopleSoft (UV_GL_JRNL_INQUIRY_SPA_APRVL) at a minimum of twice a week to capture all journals submitted by the Units and awaiting SPA approval.
- SPA Compliance Analyst will add all cost transfers to an internal SPA journal tracker for FA review.
- SPA FAs will review all journal entries at a minimum of twice per week for the following:
  - Verify correct journal class is selected on the journal header.
  - Review entries in the journal to ensure the correct chart strings have been entered.
  - Verify the expense(s) for allow ability and compliance with Uniform Guidance, sponsor’s guidelines and the University of Vermont policies.
- Review all backup to ensure it is in compliance with SPA process and adequately documents the need for the cost transfer, as well as, ensure the justification and corrective action is appropriate and consistent.

- SPA FA will work with the UA to resolve any issues that are found in either the journal entry or supporting backup.
  - For cost transfers over 90 days, the UA should submit the journal in PeopleSoft by the end of the 1st business day of the following month to allow time for the FA and Compliance Analyst to review and post in the current month. If issues are found, this may affect the ability to post in the current month.
  - For cost transfers under 90 days, The UA should submit the journal in PeopleSoft by the end of the 3rd business day of the following month to allow time for the FA and Compliance Analyst to review and post in the current month.

- SPA FA will approve the journal for posting on the Journal Entry Tracker.
- SPA Compliance Analyst will review the journal and backup.
- For all cost transfers over 90 days, it is required that the SPA Director review and sign the cost transfer form after the Compliance Analyst. If any issues are found, the SPA FA will work with the UA to resolve.
- Once all signatures are received and no issues remain, the SPA Compliance Analyst will post the journal in PeopleSoft.

**Helpful Links**

**University of Vermont**

- [University Operating Procedure: Cost Transfers Involving Sponsored Agreements](#)
- [SPA Forms Library](#)
- [Journal Entries User Guide](#)
- [Cost Accounting Services: Cost Transfers FAQs](#)

**External**

- [eCFR: Electronic Code of Federal Regulations](#)

**Document Change Record**

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