Research & Sponsored Programs UNIVERSITY OF DENVER	Office of Research and Sponsored Programs Policy Manual Cost Transfers to Sponsored Program Funds
Supersedes Document Dated: 01/01/2021	Policy Number: ORSP-10
Recommended By: Director of Sponsored Programs Administration; Sponsored Program Academic Research Council Approved By: Senior Vice Provost for Research and Graduate Education	Effective Date: 08/20/2023

#### 1. PURPOSE

To clarify the procedures for resolving discrepancies in the transfer of expenses to Sponsored Program funds.

### 2. **DEFINITIONS**

- 2.1. Cost Transfer is the transfer of an expense to a Sponsored Program fund from a fund.
- 2.2. Departmental Administrator is a University employee having administrative duties including the input of transactions into the University's financial system (Banner).
- 2.3. Principal Investigator is a University employee that leads a given program or project and is responsible for the proper conduct of research or other activity described in the proposal, grant, or instrument of agreement for the specific program or project.
- 2.4. Sponsored Programs are programs or projects that are funded by an external entity through a written agreement (grant, agreement, or other instrument) with the University. Sponsored Programs include specific research, training, or service programs and projects.
- 2.5. University Financial Services manages the University's central payroll, disbursements, and procurement functions.

# 3. POLICY

Expenses assigned to Sponsored Programs funds will be in compliance with all federal regulations, and specific grant terms and conditions. Expenses will be recorded against the correct fund upon initial posting in Banner. However, in cases where error has occurred, an adjustment must be made as soon as the error has been identified.

### 4. PROCESS

4.1. Upon recognition of an expense that was not assigned to the appropriate Sponsored Program

fund, the Principal Investigator will submit a request that includes a written explanation, to include a detailed explanation of how the error occurred, a justification for the charge, and assurances that the adjustment is correct and appropriate for the Sponsored Program.

## 4.2. Requests will be submitted as follows:

- 4.2.1.For a payroll Cost Transfer, a payroll redistribution form will be submitted to the Office of Research and Sponsored Programs (ORSP) for review and approval. Once approved, ORSP will then forward the form to University Financial Services for processing. If a payroll adjustment is identified during the effort certification process, the payroll adjustment should be submitted at that time along with a revised effort certification. Payroll adjustments for periods that were previously certified according to the Certification of Effort Policy (ORSP-08) will not be allowed without approval of the Vice Provost for Research. If approved, a revised effort certification will be required.
- 4.2.2.For non-payroll Cost Transfer, the request must be submitted to the Departmental Administrator who will forward to the divisional business officer for approval. The divisional business officer or designee is responsible for obtaining proper justification for the Cost Transfer and for making a determination of whether to approve the Cost Transfer. Once approved by the divisional business officer, the Controller's Office will process the Cost Transfer.
- 4.3. Cost Transfers initiated longer ninety (90) days after the initial posting of the expense will only be approved upon determination that cause of the delay was outside of the control of the Principal Investigator.
- 4.4. The Principal Investigator is has ultimate responsibility for the conduct of the Sponsored Program including financial management and will make timely reporting of all expenditures pursuant to the University Business Expense Policy (FINA 2.10.032).
  - 4.4.1. The Departmental Administrator will provide the Principal Investigator timely financial information and charts of accounts and will submit journal entries into Banner with appropriate explanation and justification.
  - 4.4.2. ORSP will support the Principal Investigators and Departmental Administrators to designate expenses within the approved Sponsored Program Budget and to assign expenses to the correct assignment Sponsored Program fund, to review requests for Cost Transfers, and to post journal vouchers of approved Cost Transfer requests.

### 5. RESOURCES

- 5.1. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR § 200.
- 5.2. University Business Expense Policy FINA 2.10.032