 VILLANOVA UNIVERSITY	Title: Cost Transfers in Sponsored Programs	
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I. PURPOSE

The objective of this policy is to establish a uniform institutional control for all Sponsored Program accounts that aligns with University, sponsor, and federal regulations, and to provide guidance to the Villanova community on Cost Transfers.

Federal regulations restrict the movement of expenditures onto and between sponsored grants, contracts, and agreements. Those regulations state that all cost transfers must be completed promptly after discovering the original erroneous expense and must provide adequate justification for the transfer or reallocation.

II. SCOPE

This policy applies to all sponsored program funds managed by Villanova University. A cost transfer is defined as an accounting entry that moves an expense onto or between sponsored award(s).

III. DEFINITIONS

IV. POLICY STATEMENT

As the steward of sponsored funds, Villanova University seeks to ensure that all expenditures charged to sponsored awards are 1) allowable, allocable, reasonable, and necessary, and 2) align with University, sponsor, and federal regulations. In the case of error, a cost transfer is used to move expenses to or from a sponsored award index.


To comply with allowability and allocability requirements of [Uniform Guidance Subpart E - Cost Principles](#), cost transfers must include supporting documentation that provides sufficient justification for the transfer. Timeliness and completeness of cost transfer justifications are critical in supporting allowability and allocability in accordance with the principles set forth in Uniform Guidance.

Cost transfer requests that seek to remove unallowable costs from a sponsored project will always be approved to support accurate sponsor billing.

If sponsored project work must begin prior to execution of an award, the PI should request an Advance Account. Please refer to the University Advance Account procedure for further information.

Timeliness

To ensure that all transfers are completed within 90 days per [federal guidelines](#), all requests for cost transfers must be received by the Office of Grants and Contracts (OG&C) within 60 days of availability of the monthly report where the charge first appeared.

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To enable the University to meet invoicing and reporting regulations, cost transfers must be submitted within 30 days after the sponsored award end date. Please refer to the Closeout Policy for additional details.

Late Cost Transfers

Late cost transfers can be interpreted as a sign of weak internal controls and may lead to audit findings and other penalties. If cost transfers are submitted outside of the standard 60- and 30-day windows, they will typically not be approved. To ensure that Villanova provides accurate sponsor invoices, Villanova will always approve CTs that remove costs that do not belong on a sponsored award account. Both the University Controller and the Director of the Office of Grants & Contracts must approve exceptions.

V. PROCEDURE

VI. RELATED INFORMATION/FORMS

[Uniform Guidance – 2 CFR 200 – Subpart E](#)
[National Science Foundation Grants Policy Statement](#)
[NASA Grant & Cooperative Agreement Manual](#)
[NIH Grants Policy: Cost Transfers, Overruns, and Accelerated and Delayed Expenditures](#)

Villanova Cost Transfer Procedure
 Villanova Cost Transfer Form


TBD: Villanova Closeout Policy
 TBD: Villanova Administrative & Clerical Salaries Policy
 TBD: Villanova Advance Accounts Policy
 TBD: Villanova Computing Supplies Policy
 TBD: Villanova Equipment Policy
 TBD: Villanova Sponsored Travel Policy
 Costing Policy Guidelines for Sponsored Programs

VII. HISTORY

Effective Date: June 1, 2016
 Revisions Date(s): August 27, 2018

VIII. RESPONSIBLE UNIVERSITY DIVISION/DEPARTMENT

Controller's Office
 800 Lancaster Ave
 Villanova, PA 19085

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In collaboration with the Office of Grants & Contracts
800 Lancaster Avenue
Middleton Hall
Villanova, PA 19085

IX. RESPONSIBLE ADMINISTRATIVE OVERSIGHT

Controller's Office
800 Lancaster Ave
Villanova, PA 19085

In collaboration with the Office of Grants & Contracts
800 Lancaster Avenue
Middleton Hall
Villanova, PA 19085