

COST TRANSFER POLICY

Policy No.: CU-OSP-82

Section 1. General

- 1.1 Scope: This policy applies to all sponsored projects, contracts, and/or grants, as well as principal investigators, departments, and offices that are involved in the administration, use, or implementation of sponsored award agreements or subawards issued. This policy is applicable to grants awarded after December 26, 2014.
- 1.2 Authority: W. Va. Code § 18B-1-6; 2 CFR 200, referred to as "The Uniform Guidance on Federal Awards."
- 1.3 Effective Date: June 03, 2025
- 1.4 Purpose: The purpose of this policy is to establish procedures for applying cost transfers on awards for all sponsored projects, contracts, and/or grants in accordance with the Uniform Guidance of Federal Awards (2 CFR 200).

Section 2. Policy

- 2.1 It is the policy of the University that all cost transfers, including all costs, charged to sponsored projects must be allowable, reasonable, and allocable, and they must comply with the federal regulations outlined in 2 CFR 200 Subpart E.
- 2.2 Costs allocable to a particular sponsored agreement may not be shifted to other sponsored agreements in order to meet deficiencies caused by cost overruns, to avoid restrictions imposed by statute, regulations or terms and conditions, or for other reasons.
- 2.3 Expenditures should be charged to the appropriate award when they are incurred.
- 2.4 Should an erroneous expenditure occur, and it becomes evident that a transfer of expenditures to a different sponsored award for approved circumstances is necessary, the cost transfer should take place within ninety (90) days of when that need is

identified. In cases where the sponsoring agency's terms and conditions are stricter than 90 days, Concord University will follow that limit instead.

- 2.5 Cost transfers for correcting erroneous expenditures must be supported by documentation which contains a full explanation of how the error occurred and a correlation of the charge to the project to which the transfer is being made.
- 2.6 All cost transfers to or from sponsored projects, contracts, and/or grants will only be made with OSP approval and in compliance with this policy. Generally, cost transfers are discouraged, and if truly needed, they are kept at a minimum.

Section 3. Definitions

- 3.1 **Cost Transfer** a reassignment of an expense to or from a sponsored award after the expense was initially charged to another sponsored award or non-sponsored fund. Cost transfers include reassignments of salary, wages, tuition, and other direct costs.
- 3.2 **Allowable Cost** costs which are necessary for the project to meet its objective(s) and meet the criteria for reasonable and allocable costs outlined in 2 CFR 200.403.

Section 4. Responsibility for Implementation

The Office of Sponsored Programs shall have primary responsibility for implementation and review of the developed procedures along with monitoring and updating this policy in accordance with federal award requirements.

Section 5. Amendments

This Policy may be amended to change or update any and all West Virginia Code citations, names, titles, links to information, grammar, and spelling without going through the rulemaking process.

Federal and State laws, rules and regulations change. The Board may modify any portion of this policy to conform with the University's practices with such changes. Subject to the University's rulemaking policy, the University will change this policy to conform to the most current laws, rules, and regulations within a reasonable time of discovering the change.

Approval:

Intent to Plan approved by Board of Governors: October 17, 2024

Policy approved by the Board of Governors: June 03, 2025