UNIVERSITY OF MIAMI POLICY AND PROCEDURE MANUAL

TITLE:	Cost Transfer Policy	REFERENCE:	New
CATEGORY:	Office of Research Administration	PAGE:	1 of 2
		SUPERSEDES:	New
APPROVER:	Barbara A. Cole	VERSION:	New
	Associate Vice President	EFFECTIVE:	March 31, 2016
	Office of Research Administration		

PURPOSE:

The purpose of this policy is to establish uniform procedures for all cost transfers on sponsored activities in a manner consistent with requirements set forth in 2 CFR 200, Federal and State regulations, as well as agency specific guidelines. Failure to comply with UM's policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded clinical trials.

SCOPE:

All UM personnel must be aware of the complex and detailed rules provided under Federal and non-Federal regulations as well as the terms and conditions of the individual sponsored activity. While compliance with all applicable requirements is essential, it is equally important to maintain an open research environment that welcomes the participation of researchers from around the world as part of UM's mission. To maintain this balance, UM personnel must be familiar with this policy in addition to the Federal and non-Federal regulations on restricted sponsored activities.

This policy applies to all UM personnel, namely:

- Faculty, including voluntary faculty.
- Faculty emeriti engaged as active researchers on UM research activities.
- Researchers, including research staff, postdoctoral fellows, and research associates.
- Graduate students, undergraduate students, and interns involved in research programs.
- Staff in departments, centers, institutes, and administrative offices charged with responsibilities under this policy.
- Consultants, agents, and volunteers associated with research and scholarly activities, as well as in departments and offices charged with responsibilities under this policy.

POLICY:

It is the policy of the University of Miami that all costs, including payroll costs are charged to the appropriate sponsored project when first incurred. When expenditures need to be transferred to or from a sponsored project subsequent to the initial expenditure, the request to transfer should be timely and in accordance with the provisions of this policy and the Direct Cost Policy.

Personnel Cost

UM uses the after-the-fact confirmation method, which means that the effort percentages are certified after payroll has been processed. Initially, an estimated amount based on the committed effort will be charged to a project, and certified during the effort certification periods. Any adjustments should be made before the effort has been certified. After the effort has been certified, changes will be charged to the department, unless otherwise specified in the Effort Reporting Policy.

Non-Personnel Cost

All non-personnel cost transfers should be:
- Processed within 90 calendar days of the posting of the original transaction.
- Properly justified and accompanied with sufficient support documentation.
- Must be allowable (allocable, consistently treated, and reasonable) for the project for which the cost will be transferred.

DEFINITIONS:

Please refer to UM's ORA website for a list of acronyms and terms commonly used in sponsored/ research administration grants, contracts, and cooperative agreements: http://ora.miami.edu/_assets/pdf/ora-policies/glossary.pdf

PROCEDURE:

UM personnel are to use UM's ORA website for guidance on matters pertaining to sponsored activities.

UM personnel are to follow the Standard Operating Procedures (SOP) outlined, as well as utilize the various required forms and templates that have been implemented for the activities related to this policy.

UM personnel should contact the Pre or Post Award staff for consultation if additional information is needed. Contact information can be found on UM's ORA Contacts Webpage.