



**Effective:** 01/15/2026  
**Last Revised:** 01/15/2026

**Responsible University Office:**  
*Finance Office*

**Responsible University Administrator:**  
*Vice Chancellor for Business & Finance*

**Policy Contact:**  
*Debbie Tvrdy, Grant Accountant, tvrdyds@unk.edu, (308) 865-8421*

---

## Cost Transfer Policy and Guidelines for Sponsored Programs

### POLICY CONTENTS

Scope  
Policy Statement  
Reason for Policy  
Procedures  
Definitions  
Additional Contacts  
Forms  
Related Information  
History

---

### Scope

All University of Nebraska at Kearney faculty and staff that work with projects funded by *all* outside Granting Agencies, including Federal and Federal pass-through projects.

---

### Policy Statement

Every effort should be made to charge expenses directly to the correct sponsored project fund center. If an expense transfer (journal entry or payroll transfer) is necessary to move an expense on to a sponsored project fund center, a **Cost Transfer Explanation and Justification Form** should be completed **within 90 days** of the expense posting. Cost transfers after 90 days will only be allowed in **extenuating circumstances**, such as late issuance of the award or contract after the start date. Reasons such as “error just discovered” or “late notice from the Principal Investigator (PI)” are not acceptable. No time limit exists for removing expenditures from a sponsored project. If inappropriate expenditures are discovered on sponsored projects, they must be moved to a non-sponsored departmental fund center without regard to time limits. It is the responsibility

of the PI and Department to ensure proper stewardship over sponsored projects in accordance with the sponsor's policies and regulations, including those relating to regular monitoring of expenditures and timely correction of errors and reallocation of expenses.

---

## Reason for Policy

To comply with Federal OMB Circular 2 CFR 200.430 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

---

## Procedures

When a cost transfer is necessary:

1. Complete a Personnel Action Change Form (PACF) (or other applicable payroll form if related to a stipend) for salary & benefit expense transfers or a G/L Account Posting Form for non-personnel expense transfers
2. Complete a **Cost Transfer Explanation and Justification Form** must be completed and signed by the Principal Investigator (PI).
3. It must be approved by the Department Head and then sent to Debra Tvrdy, the Grant Accountant, at [tvrdyds@unk.edu](mailto:tvrdyds@unk.edu).
4. Reference information related to the original transaction should be included (fund center #, vendor name or personnel #, posting date, amount, etc.).
5. The justification must include:
  - o How the error occurred.
  - o Reason why the new allocation is appropriate.
  - o Any relevant supporting documentation.
6. The request must be submitted within 90 days of the original expense, unless an exception is approved.
7. The Grant Accountant, Debra Tvrdy, will make the determination of whether to approve the request or not. This may be done in consultation with the Associate Vice Chancellor for Research and Creative Activity, Dr. Kim Carlson.
8. If an exception is requested, the **Cost Transfer Explanation and Justification Form** will need to be completed and submitted. The determination to approve the request or not will be made by The Grant Accountant, Debra Tvrdy, the Associate Vice Chancellor for Research and Creative Activity, Dr. Kim Carlson, the Director of Academic Resources & Institutional Research, Megan Fryda, and the Chief Compliance Officer, Alex Straatmann, in consultation with the Director of Finance, Jill Purdy, if deemed necessary.
9. All documentation must be retained for audit purposes.

---

## Definitions

**Fund Center:** Fund Centers are used to plan, gather, and track revenues and costs. There are two types of fund centers, the cost center and the WBS element.

**PACF:** Personnel Action Change Form used for rehire actions, organizational changes, rate/salary changes, funding changes and separations.

**G/L Account Posting Form:** Used to request a journal entry to move previously posted non-payroll expenses coded to an incorrect fund center to the correct fund center. Form includes reference information such as fund center #, SAP document #, posting date, and vendor name.

---

## Additional Contacts

| <i>Subject</i>            | <i>Contact</i>         | <i>Phone</i>        | <i>Email</i>              |
|---------------------------|------------------------|---------------------|---------------------------|
| <b>Grants Accounting</b>  | <b>Debbie Tvrdy</b>    | <b>308-865-8808</b> | <b>tvrdyds@unk.edu</b>    |
| <b>Sponsored Programs</b> | <b>Dr. Kim Carlson</b> | <b>308-865-1554</b> | <b>carlsonka1@unk.edu</b> |

---

## Forms

[Cost Transfer Explanation and Justification Form](#)

[Personnel Action Change Form](#)

[UNK G/L Account Posting Form](#)

---

## Related Information

[2 CFR 200 – Uniform Administrative Requirements, Cost Principle, and Audit](#)

[Requirements for Federal Awards](#)

[Fiscal Responsibility and Review of Financial Reports Policy](#)

[Records Retention Policy](#)

---

## History

This is a new policy.