

## What is CGA Compliance looking for in your HRCT questionnaire?

### Question 4: How did the expenses to be transferred benefit the sponsored project?

How the cost benefits and is appropriate for the award to which the cost is being transferred.

Example:

- The principal investigator requested the transfer and the reason for the transfer.
- If requested by someone other than the PI, identify in detail how the person knows what award to charge.

### Question 5: If any partial transfers are requested, please explain the allocation methodology applied, that is, how the split was determined, and include why that methodology is appropriate.

Explain the basis for proration/ allocation methodology and or split.

Example:

- 4 of the 6 widgets were used for this project
- Allocated by labor cost or lab space if appropriate

### Question 6: Why were the expenses not posted to the correct account initially?

What is the reason was the expense was not originally charged to the appropriate account and why did the error occur.

If the expense occurred before the correct account was set up, why was an advance account not used?

\*An explanation merely stating that the transfer was made "to correct error" or "to transfer to correct project" is not sufficient.

### Question 7: What was the extenuating circumstance that delayed the transfer for more than 120 days?

Identify when the error was discovered, and what unusual circumstance prevented timely review and correction within the 120 day window allowed by policy. Why were they not moved sooner?

Must be supported by documentation that fully explains how the error occurred.

\*An explanation merely stating that the transfer was made "to correct error" or "to transfer to correct project" is not sufficient.

### Question 8: In what way were these circumstances out of the control of the department?

Examples:

- Request sent to UC Path wasn't completed timely, or had a key entry error (document!)
- Did you follow up? If not, why?
- Sponsor re-budget approval was required and just received
- Advance account request was denied by SPO

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Question 9: If the circumstances were NOT out of the department's control, what steps have you taken to ensure that all cost transfers will be processed timely in the future?

### a) When were/will these steps be implemented?

Specific process changes or new control measures within the dept, not specific to an individual, that will help to prevent future HRCTs. They must be already implemented or have a scheduled date for implementation. Ambiguous plans or anticipating future staff hiring is not sufficient.

Example:

- We now have a log on a shared server that is used to track payroll transfer requests thru to completion and ensure they post correctly.
- Additional existing staff will be receiving UC Path training next month and will be providing backup for transaction processing.
- We now have a cooperative agreement with XX dept to provide UC Path backup for each other.

## High-risk Cost Transfer: Insufficient Justification Examples

- Moving to "fix error" or "correcting the original charge"
- So and so told me to move it
- So and so didn't tell me to move it in time
- The charge belongs to this account
- The previous admin did it and we don't know why
- No one has been looking at this account
- No money left, so PI wants the expense on a different grant
- Short-staffed/volume of work
- Grant has already been reported as fully spent and need to use up the remaining balance.
- I moved off too much, and I need to move some expense back.
- The PI is on leave and unavailable to review ledgers