

Job Aid: Understanding and Responding to 90-Day JV Questions

Disclaimer: This job aid is not meant to be an “all-inclusive” list. This job aid has been prepared to help guide users in preparing complete responses to the 90-day JV questions. Responses to audit questions should focus specifically on the data/the cost being transferred. However, consideration of dates, people, places, processes, etc. may be pertinent to help explain/justify the cost that is being transferred.

Question 1:	What is the oldest original date of the expense being transferred? "Original date" can be defined as the first date that the expense was charged to a UD purpose.
Question 2:	Why was this original expenditure not charged appropriately? The detailed response should minimally address who, what, when, where, why and how. Some thoughts to consider that may help to clarify a complete response to this question are: Who had access to the data? When did they have access? Who changed the data? When did the data change? Was a control process not in place at the time the original transaction took place? Was an invalid process followed? Was an existing process not followed? What happened initially that caused the incorrect recording of the item?
Question 3:	Why should this charge be transferred to the proposed receiving project? Justification is needed as to why the expense should be transferred to the “receiving project.” If the cost is to be transferred to a sponsored agreement, is the expenditure appropriate for that project? Is the expenditure in compliance with the terms and restrictions of the award document? Some thoughts to consider that may help to clarify a complete response to this question are: If the charge is an allocation between multiple projects, how is it being supported (refer to UD CAS guidelines) http://www.udel.edu/research/pdf/cost-accounting-guidelines.pdf ? What makes the charge valid for the ‘receiving project’ and invalid for the existing project? Is there supporting documentation to validate the expenditure?
Question 4:	Why is this cost transfer being requested more than 90 days after the original transaction date? Timing is the key response here. If a 90-day JV is needed, it may give the impression that our institution is not managing funds properly. Proper management of funds requires frequent review of spending activities/transactions. Some thoughts to consider that may help to clarify a complete response to this question are: Is there supporting proof or documentation to indicate adequate efforts were taken to have the transfer processed prior to 90 days? Is there a flaw with the current process? Why wasn't the need for this transfer found earlier? Is the college/department dependent on another area in ensuring timely posting of transactions?
Question 5:	What steps will be taken to prevent this type of error from happening in the future? This response should either indicate the adherence to an existing process or the implementation of a new process. It is recommended that you review UD's Externally Sponsored Project Cost Transfer Policy 6-18 http://www.udel.edu/ExecVP/policies/research/6-18.html and Cost Transfer Procedures http://www.udel.edu/ExecVP/policies/Cost%20Transfer%20procedure.doc . Some thoughts to consider that may help to clarify a complete response to this question are: Monthly review of award activity along with consultation with PI is recommended to promote UD's established guidelines for responsible stewardship of funds. Is everyone aware of departmental processes?