Procedures for Labor Cost Transfers

Definition
Labor cost transfers are defined as allocations of labor expense impacting sponsored project(s) after the effort period has closed. This procedure applies to all sponsored projects with both federal and non-federal awards.

The new process requires **dual steps completed simultaneously** as attachments are no longer accepted in Banner. Please follow the directions below for adding GCAS into the approval flow for your Labor Distribution and Redistribution and where to submit the Cost Transfer Justification Form.

Procedures when the Effort Period has been closed:
1. Banner – Department processes the Labor Redistribution (LR) or Distribution (ePAF).
2. Banner – Department assigns GCAS Compliance in the approval flow at Sequence 60, please use Patrick Miller as the Approver.
3. Cost Transfer Justification Form Submission – Department submits the Cost Transfer Justification Form through the Invoice Submission page on Accounts Payable website.
   a. [https://accountspayable.gwu.edu/invoice-submission-1](https://accountspayable.gwu.edu/invoice-submission-1)
   b. Choose your Sponsored Project Administrator.
   c. Invoice Number should be made up of the last name, first initial of first name, plus the effort cycle (e.g., J-M, J-A, S-D) and year (e.g., Jane Doe for period September-December 2018  DOEJ_SD2018).
   d. Invoice Date should be the last day of the Pay Period, MMDDYY.
4. OVPR SPA/SPM will review Labor Cost Transfer in Remedy.
   a. If approved, OVPR SPA/SPM assigns the Remedy ticket to Grants & Contracts Accounting Services, which will then be assigned to Patrick Miller.
5. GCAS will review the request and if there are questions will send emails directly to end users with a copy to OVPR SPA/SPM, see additional information below. Otherwise GCAS will approve in Banner and Remedy.
   a. If GCAS or OVPR send questions to the department and a response is not received by the 5th business day, the Cost Transfer request and Labor Distribution/Redistribution will be rejected and sent back to the department. GCAS or OVPR will email the department and SPA/SPM about the status.
   b. There may be cases where Cost Transfers will be rejected for Sponsored Projects. In that case, the labor redistribution request will be denied and GCAS or OVPR will send an explanation for rejection to the department copying the appropriate parties.

References:
1. Cost Transfer Policy: [https://compliance.gwu.edu/cost-transfers-sponsored-projects](https://compliance.gwu.edu/cost-transfers-sponsored-projects)
2. Effort Reporting Policy: [https://compliance.gwu.edu/effort-reporting](https://compliance.gwu.edu/effort-reporting)
3. Note: If you are processing a labor distribution or redistribution for a period where effort has already been confirmed, this procedure must be followed. If not followed and is found, there is a chance the effort will be removed from sponsored projects and charged to the home department.

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1 See Cost Transfer Policy (reference #1) for definition of cost transfer

Last Updated Date: January 31, 2019
Process Flow:

**LABOR COST TRANSFERS**

**REMEDY WORKFLOW**

- Department creates Remedy ticket and attaches CTIF for Labor Redistribution (A)
  - OVPR Reviews Labor Redistribution (B)
    - Approved: Yes or No?
      - Yes
        - GCAS SPFA Reviews Labor Redistribution
          - Approved: Yes or No?
            - Yes
              - Controller /Controller Designee Reviews Labor Redistribution (C)
                - Approved: Yes or No?
                  - Yes
                    - Notify all personnel of rejection
                      - GCAS processes Labor Redistribution (D)
                  - No
                    - Notify Department and OVPR of rejection
                      - GCAS processes Labor Redistribution (D)
                - No
                  - Notify Department and OVPR of rejection
                    - GCAS processes Labor Redistribution (D)
    - No
      - Notify Department of Rejection
        - GCAS processes Labor Redistribution (D)

**BANNER (LR SELF SERVICE)**

- Department processes Labor Redistribution (Adding GCAS Compliance in Approval Flow) (A)
  - GCAS Compliance Reviews Labor Redistribution (C)
    - Approved: Yes or No?
      - Yes
        - Notify Department and OVPR of rejection
          - GCAS processes Labor Redistribution (D)
      - No
        - Notify Department and OVPR of rejection
          - GCAS reviews Labor Redistribution (C)

**GCAS Compliance**

- GCAS Compliance provides LR screen shots

Last Updated Date: January 31, 2019