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Overview

Introduction

Agencies and institutions recover indirect costs from grants and contracts by completing a cost allocation plan and/or an indirect cost rate proposal. This topic assists agencies and institutions in meeting the Commonwealth’s indirect cost recovery requirements as set forth in the *Appropriation Act*, Section 4-2.03.a.


This topic is organized into two parts as follows:

Indirect Cost Recovery from Grants and Contracts

- Establishes the policies and procedures for agencies to follow in recovering indirect costs from grants and contracts. The role of the Department of Accounts (DOA), central service agencies, and agencies/institutions is outlined.

Nongeneral, Nonfederal Funded Agencies

- Explains the rationale of full costing statewide indirect cost recovery and the role of DOA and the Department of Planning and Budget (DPB) in both the preparation of the full costing assessment schedule and the resulting Appropriation Act transfers.
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Definitions

Agency Versus Statewide Indirect Costs

The following table compares the differences between Agency and Statewide Indirect Costs.

Agency Indirect Costs...	Statewide Indirect Costs...
...are incurred by agencies.	...are incurred by central service agencies.
...have administrative costs borne by the agency	...are calculated in Federal SICAP.
...benefit more than one cost objective.	...are provided to agencies by DOA.

Allocation Plans

The *Full-Costing Statewide Indirect Cost Allocation Plan* is compared to the *Federal Statewide Indirect Cost Allocation Plan* as follows:

Plan Type	Full Costing	Federal
Preparation	DOA	DOA
Allocation	General Fund cost of central service agencies	General Fund costs of central service agencies
Governance	NOT governed by Federal guidelines	By Federal guidelines 2CFR, Part 200
Support	Determines support to nongeneral nonfederal programs	Determines support to Federal programs
Product	Assessment Schedule (Appropriation Act transfers section)	Fixed costs by agency or Statewide indirect costs to be used in agency rate calculations

Central Service Agency

A state agency rendering various support services to other state agencies in the Commonwealth. These services may or may not be provided with charges to the recipient agency.

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Definitions, Continued

Central Service Cost Allocation Plan

Cost allocation plan prepared by DOA and referred to as the *Statewide Indirect Cost Allocation Plan*, (SICAP) that documents, identifies, accumulates, and allocates allowable costs of services provided by central service agencies to benefiting agencies and institutions.

Cognizant Agency

Federal agency responsible for reviewing, negotiating, and approving a specific state agency or institution’s cost allocation plan or indirect cost rate proposal.

Example: The Department of Health and Human Services is the cognizant agency for all state central service cost allocation plans.

The federal Office of Management and Budget (OMB) publishes a list of all cognizant agencies which can be obtained at:

<https://harvester.census.gov/facides/files/agencycontact.pdf>

Direct Versus Indirect Costs


Direct Costs

Expenditures identified to a final (or singular) cost objective.

Indirect Costs

- Expenditures incurred for a joint purpose that benefit more than one cost objective.
- Expenditures are divided between Agency and Statewide.

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Definitions, Continued

Grantor Agency An agency or institution registered on behalf of its federal grant-making agency to post funding opportunities or manage submissions to these funding opportunities. The agency or institution serves as the direct recipient of a grant and is accountable for the use of the funds received.

Indirect Cost Recoveries Funds received for indirect costs that are reimbursed or "recovered" from grants. Indirect cost recoveries are identified as either agency or statewide.

Sub-Recipient Non-federal entity, e.g., an agency, that expends federal awards received from a pass-through entity/grantor agency to carry out a federal program but does not include an individual that is a beneficiary of such a program.

2CFR, Part 200 *The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*

- Published by Federal Office of Management and Budget.
 - Establishes the principles and standards for determining costs for Federal awards carried out through grants, cost reimbursement contracts, and other agreements with State and local governments and federally- recognized Indian tribal governments (governmental units).
 - Establishes the principles for determining costs applicable to grants, contracts, and other agreements with educational institutions.
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Responsibility, Continued

Central Service Agencies

All **central service agencies**, or other agencies submitting data for inclusion in the statewide indirect cost allocation plan, will perform the following functions:


1. Provide the required data to DOA in a timely manner, accompanied by the standard SICAP certification form signed by the agency head or his or her designee, attesting to the integrity of the data;
2. Maintain work papers supporting the data provided to DOA for a period of three years commencing with the submission of said data to DOA; and
3. Make available all related work papers upon request to DOA, Auditor of Public Accounts or federal reviewers.

Agencies & Institutions Administering Grants or Contracts

State agencies and institutions will perform the following functions:

1. Prepare indirect cost allocation plans or indirect cost rate proposals in accordance with federal cost principles.
2. Maintain working papers supporting the development of timely indirect cost rate proposals or cost allocation plans and make these working papers available to the Auditor of Public Accounts and DOA's staff for review upon request.
3. Record indirect cost recoveries and all related transfer entries if appropriate (agencies only), at least on a quarterly basis, to the appropriate fund and account code according to accounting procedures established by DOA.
(See **Recording Indirect Cost Recoveries** in this CAPP Topic).
4. Prepare indirect cost allocation plans or indirect cost rate proposals in accordance with federal cost principles.
5. Maintain working papers supporting the development of timely indirect cost rate proposals or cost allocation plans and make these working papers available to the Auditor of Public Accounts and DOA's staff for review upon request.
6. Record indirect cost recoveries and all related transfer entries if appropriate (agencies only), at least on a quarterly basis, to the appropriate fund and account code according to accounting procedures established by DOA.
(See **Recording Indirect Cost Recoveries** in this CAPP Topic).

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Responsibility, Continued

Agencies &
Institutions
Administering
Grants or
Contracts,
continued

7. Ensure that adequate information is available to monitor indirect cost recovery efforts.
8. Complete the Indirect Cost Recovery Reconciliation Attachments included with the Fiscal Year Closing Procedures (agencies only).
9. Maintain, and make available for review upon request, a listing of all grants and contracts.
10. Only Tier III institutions are required to provide the following by institution number to DOA by the end of July for each preceding fiscal year:
 - Total expenditures for fiscal year to date for all funds and personal service cost expenditures in account code 5011xx0. (See Note)
 - Net expenditures by institution for fiscal year to date for selected account codes 5012970, 5013970, 5015970, 5021970, 5022970, and 5023970 by fund. (See Note)
 - Net Revenue by fund for the fiscal year to date recorded in account code 4009071, Recovery of Statewide Indirect Cost Grant/Contract Administration, 4009073, Recovery of Higher Education Institution Indirect Cost Grant/Contract Administration, and 4009082, Recovery of Higher Education Institution Indirect Cost Grant/Contract Administration for Sub-Recipients.
 - Listing of expenditures, where the payment has been made to other state agencies/institutions. Include in the listing the fiscal month the expenditure was recorded, the institution’s number, the transaction amount, fund, program, account code, and agency/institution name to which the payment was made.

Note: If the net expenditures reported on Cardinal for fiscal year end June 30 for these account codes are complete and accurate, DOA should be able to use Cardinal reports for this information. Otherwise, these items must be submitted. In either case, the Tier III institution must let DOA know whether to obtain this information from Cardinal or whether it will be provided separately.

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Procedures, Continued

Central Service Agencies’ Required Documentation

Central service agencies are required by federal 2CFR, Part 200, to submit to DOA for inclusion in the federal SICAP the following detailed documentation:

Internal Service Funds (Budget of \$5 million or more)	<ol style="list-style-type: none"> 1. Description of the service 2. Fund Statement of Net Position 3. Revenue/expenditures statement, with revenues by source 4. List of nonoperating transfers 5. Description of billing procedures (methodology) used to charge costs to users 6. Schedule of current rates 7. Schedule comparing full revenues (including imputed revenues) by service to the allowable costs 8. Explanation of how variances between revenue and expenses will be handled 9. Documentation that revenue reported includes all revenues generated by the service including unbilled and uncollected revenue 10. Expenses reported by cost category 11. Amount of working capital reserve if any
Self-Insurance Funds	<ol style="list-style-type: none"> 1. Fund Statement of Net Position 2. Statement showing fund income and fund outlays, including a summary of billings and claims paid by agency 3. Listing of all non-operating transfers into and out of the fund 4. The types of risks covered by the fund 5. An explanation of how the level of fund contributions is determined, and actuarial report 6. Description of procedures used to charge or allocate fund contributions to benefiting activities 7. Explanation of reserve levels in excess of claims paid, submitted but not adjudicated, and incurred but not submitted

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Procedures, Continued

Central Service Agencies' Required Documentation, continued	Fringe Benefits	<ol style="list-style-type: none"> 1. Overall annual cost of each benefit 2. Current fringe benefit policies 3. Procedures used to charge or allocate the costs to benefiting activities
	Pension and Post-Retirement Benefit Costs	<ol style="list-style-type: none"> 1. Funding policies 2. Pension plan's costs accrued for a year 3. Amount funded and dates of funding 4. Copy of actuarial report 5. Plan trustee's report 6. Schedule showing the value of the interest cost associated with any late funding
	Other Billed Central Service Activity Not Identified Above	The same documentation as required for Internal Service Funds is to be completed and maintained. However, it is not required to be submitted to DOA unless specifically requested to do so by DOA, APA or federal reviewers.
	Reconciliation of Retained Earnings	All agencies listed in the applicable agency listing of the Direct Billed Central Services Attachment of the Financial Reporting Directive must submit a Reconciliation of Retained Earnings file for each internal service fund or self-insurance fund per request of the U.S. Department of Health and Human Services.

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Procedures, Continued

Over/Under Recoveries of Internal Service Funds

Adjustments are required to be made for the over/under recoveries of Internal Service Funds. These adjustments can be made through the yearly federal SICAP in those instances where the over/under recovery does not exceed \$500,000.

Amounts that are not adjusted through the annual SICAP will be adjusted in the following manner subject to federal approval:


- cash repayment to the federal government
- credits to the amounts charged to the individual programs, or
- credit adjustment to future billing rates

DOA will notify central service agencies of the following:

- a) any over/under recoveries that are not adjusted through the SICAP
- b) any cost allocated to these internal service fund cost pools in the SICAP (cross allocations) that are not allocated to benefiting agencies. These costs allocated to the internal service funds in the SICAP are internal service fund costs and may be included in the calculation of the amount of over/under recovery.

Central Service agencies that manage internal service funds where an adjustment is necessary, will notify DOA as to the method and timeframe of repayment. DOA will coordinate any required adjustment with DHHS.

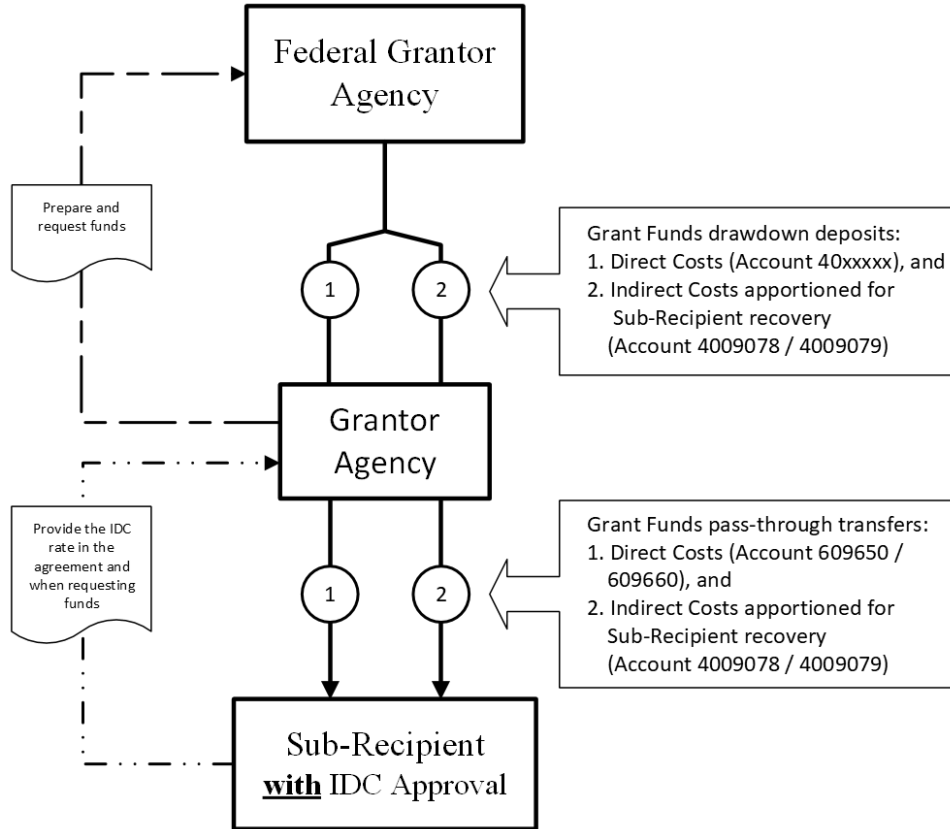
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Indirect Cost Recoveries for Sub-Recipient

The following applies when grantor agencies that do not recover indirect costs allocate grant funds to sub-recipient's approved for indirect cost recovery by its cognizant agency. The sub-recipient must stipulate in its existing agreement or grant proposal with the grantor agency, requirements that allow for the recovery of indirect costs on the sub-recipient level. The grantor agency will drawdown and transfer grant funds apportioned for sub-recipient indirect cost recovery using account code 4009078 (agency recovery) or 4009079 (statewide recovery). The sub-recipient agency should then perform the necessary procedures in Cardinal to properly record the resulting balance of pass-through indirect costs being recovered on the sub-recipient level (see **Recording Indirect Cost Recoveries** in this CAPP Topic).



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Recording Indirect Cost Recoveries in Cardinal: Agencies Only,
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Statewide
Indirect Cost
Recoveries,
continued

IF THE STATEWIDE INDIRECT COST IS APPROPRIATED TO THE AGENCY (As Approved in the Appropriation Act) ...

Step	Action
1	Prepare a General Ledger Journal.
2	Record the expenditures in the federal fund 10000 (for Non- Stimulus) or the applicable COVID-19 fund (for Stimulus (COVID-19)) by debiting the expenditure using account code 5014810 (Statewide Indirect Recoveries) and the applicable program. Credit cash account 101010.
3	Record the revenue in the special fund 02800 by debiting the cash account 101010, and crediting account code 4009071 for Non- Stimulus , 4009079 for sub-recipients, or 4009088 for Stimulus (COVID-19).

Agency Indirect
Cost Recoveries

The following procedure applies to Agency Indirect Cost Recoveries

Step	Action
1	Prepare a DT to deposit the drawdown.
2	Record drawdown in Cardinal using the Accounts Receivable module: <ul style="list-style-type: none"> Record the drawdown in the federal fund 10000 account code 4009070 for Non-Stimulus funds. Record sub-recipient Indirect Cost Recoveries in account 4009078. Record the drawdown in the applicable federal COVID-19 fund, account code 4009089 for Stimulus (COVID-19) funds.
3	Transfer immediately the drawdown to the special fund 02800 by preparing a General Ledger Journal as follows:
4	Record the expenditures in the federal fund 10000 (for Non- Stimulus) or the applicable COVID-19 fund (for Stimulus (COVID-19)) by debiting the expenditure using account code 5014820 (Agency Indirect Cost Recoveries) * and the applicable program. Credit cash account 101010.
5	Record the revenue in the special fund 02800 by debiting the cash account 101010, and crediting account code 4009070 for Non- Stimulus , 4009078 for Sub-Recipients, or 4009089 for Stimulus (COVID-19).

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**Recording
Statewide
Indirect Cost
Recoveries**

Procedures for Recording Statewide Indirect Cost Recoveries

Statewide Unappropriated

	Action by Agency	Doc	General Fund 01000	Special Fund 02800	Federal Fund 10000
1	DRAWDOWN (Based on cost allocation plan or rate)	DT			Debit cash – 101010 Credit revenue (account code 4009071 for Non-Stimulus, 4009079 for sub-recipients, or 4009088 for Stimulus (COVID-19))
2a	REPORTING TO GRANT	GL Journal			Debit expenditure – 5014810* Credit cash - 101010
2b	REPORTING TO GRANT	GL Journal	Debit cash – 101010 Credit revenue (account code 4009071 for Non-Stimulus, 4009079 for sub-recipients, or 4009088 for Stimulus (COVID-19))		

Procedures for Recording Statewide Indirect Cost Recoveries

Statewide Appropriated

	Action by Agency	Doc	General Fund 01000	Special Fund 02800	Federal Fund 10000
1	DRAWDOWN (Based on cost allocation plan or rate)	DT			Debit cash – 101010 Credit revenue (account code 4009071 for Non-Stimulus, 4009079 for sub-recipients, or 4009088 for Stimulus (COVID-19))

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Recording
Statewide
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Recoveries,
continued

Procedures for Recording Statewide Indirect Cost Recoveries
Statewide Appropriated

	Action by Agency	Doc	General Fund 01000	Special Fund 02800	Federal Fund 10000
2a	REPORTING TO GRANT	GL Journal			Debit expenditure – 5014810* Credit cash - 101010
2b	REPORTING TO GRANT	GL Journal		Debit cash – 101010 Credit revenue (account code 4009071 for Non-Stimulus, 4009079 for sub-recipients, or 4009088 for Stimulus (COVID-19))	
3	APPROPRIATION (Submit request in Budget Execution Module of PB System for appropriation of amount of revenue recorded in Fund 02800)			DPB Budget Journal Entry Increase Appropriation and Allotment, Increase Appropriation	
4	RECORD ACTUAL EXPENDITURES (When appropriation is received from DPB, code and record expenditures as “regular” account codes, e.g., salaries, services, etc., in fund 02800.)			Debit expenditure Credit cash - 101010	

* To make this monthly entry, you must have received an appropriation from DPB in Fund 10000 for Non-Stimulus or the applicable Fund for Stimulus (COVID-19).

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**Recording
Agency
Indirect Cost
Recoveries**

Procedures for Recording Agency Indirect Cost Recoveries

	Action by Agency	Doc	General Fund 01000	Special Fund 02800	Federal Fund 10000
1	DRAWDOWN (Based on cost allocation plan or rate.)	DT			Debit cash – 101010 Credit revenue (account code 4009070 for Non-Stimulus, 4009078 for sub-recipient, or 4009089 for Stimulus (COVID-19))
2a	REPORTING TO GRANT	GL Journal			Debit expenditure – 5014820* Credit cash - 101010
2b	REPORTING TO GRANT	GL Journal		Debit cash – 101010 Credit revenue (account Code 4009070 for Non-Stimulus, 4009078 for sub-recipient, or 4009089 for Stimulus (COVID-19))	
3	APPROPRIATION (Submit request in Budget Execution Module of PB System for appropriation of amount of revenue recorded in Fund 02800.)			DPB Budget Journal Entry Increase Appropriation and Allotment, Increase Appropriation	
4	RECORD ACTUAL EXPENDITURES (When appropriation is received from DPB, code and record expenditures as “regular” account codes, e.g., salaries, services, etc., in Fund 02800.)			Debit expenditure Credit cash - 101010	

*To make this monthly entry, you must have received an appropriation from DPB in Fund 10000 for Non-Stimulus or the applicable Fund for Stimulus (COVID-19).

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Recording Indirect Cost Recoveries in Cardinal: Agencies Only,
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Accountability These procedures provide complete accountability for indirect cost recovery and the basis for documenting the indirect cost expense in the federal fund— resulting in indirect cost recovery revenue being double recorded in Cardinal.


Agencies must recognize this and ensure the total of indirect cost recovery revenue in both the **general fund 01000** and **special fund 02800** is equal to the indirect cost recovery revenue recorded in the **federal fund 10000** for applicable Non-Stimulus, Stimulus (COVID-19), or Sub-Recipient fund; please refer to the example provided in the chart below. Any difference should represent revenue in the federal fund pending transfer. DOA will eliminate this duplication for financial reporting purposes.

Fund	Statewide			Agency		
	Non-Stimulus 4009071	Stimulus (COVID-19) 4009088	Sub-Recipient 4009079	Non-Stimulus 4009070	Stimulus (COVID-19) 4009089	Sub-Recipient 4009078
General 01000	\$5k	\$10k	\$15k	\$5k	\$10k	\$15k
Special 02800	\$5k	\$10k	\$15k	\$5k	\$10k	\$15k
Federal 10000	\$10k	\$20k	\$30k	\$10k	\$20k	\$30k

Appropriation Appropriations to support the expenditures in the **federal fund 10000, the applicable COVID-19 funds, and special fund 02800** must be obtained from the Department of Planning and Budget (DPB) by submitting a request in the Budget Execution Module in the Performance Budgeting System. When the appropriation is received for the special fund, actual expenditures should be recorded in the "regular" account codes (e.g., salaries, services, etc.) in **fund 02800**.

Questions regarding the procedures for obtaining the proper appropriation for indirect cost should be addressed by each agency to its DPB budget analyst.

Other agency level ChartFields in Cardinal such as Cost Center and Task may also be utilized by agencies.

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Recording Indirect Cost Recoveries in Cardinal: Institutions of Higher Education, Continued

Recording Revenue

All indirect cost recoveries received by institutions of higher education must be recorded in the following manner:

All **statewide** indirect cost recoveries must be recorded into the Higher Education Operating Fund using account code 4009071. If an institution cannot record statewide indirect cost recoveries separately from institution indirect cost recoveries as the funds are received, an adjustment must be made each quarter in order to properly reflect the statewide portion of the indirect cost recovery.

All **higher education institution** indirect cost recoveries must be recorded into the Higher Education Operating Fund using account code 4009073. All sub-recipients recovering indirect costs for pass-through funds received from institutions of higher education must record using account code 4009082.


The following is an example for recording Higher Education Institution indirect cost recoveries. The dollar amounts used are for demonstration purposes only.

Description	Account	Fund	Amount	
Grant funded payroll	Debit – 5011XX0 (Personal Svcs) Credit – 101010 (Cash)	03XXX	\$10,000	
Record IDC	Debit – 5087000 (IDC) Credit – 101010 (Cash)	03XXX	\$4,000	
(40% of Grant funded Payroll)	Debit – 101010 (Cash) Credit – 4009071 (Statewide IDC)	03000, Program 1000X** (where xx is the service area)	\$1,200	30%
	Debit – 101010 (Cash) Credit – 4009073 (Higher Ed IDC) Credit – 4009082 (Sub-recipient)	03030, Program 1100XX**	\$2,800	70%
Drawdown Grant Funds	Debit – 101010 (Cash) Credit – 40XXXXXX (where XXXXX is the IDC Revenue account)	03XXX	\$14,000	

**Under certain conditions, funds will be recorded in Fund 03160.

The recording of statewide and institution recoveries into the Higher Education Operating Fund is for information purposes only and is not intended to conflict with the provisions of the *Appropriation Act* regarding the use of the funds by higher education institutions.

Note: Account code 4009074, *Administrative Allocation for Student Scholarships and Loans* was established to record the deposit of overhead and **administrative allowances** received from loan, scholarship, and work programs such as PELL, SEOG, and federal work study. This account code is used only to record administrative allowances received from various financial aid programs.

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Responsibility, Continued

DPB

In support of indirect cost recovery, DPB will perform the following functions:

1. Review the Full Costing Assessment Schedule prepared by DOA, taking into consideration operational, budgetary, or other extenuating circumstances that could affect an agency's ability to pay these indirect costs.
2. Notify DOA, in writing, in a timely manner of any and all exemptions and adjustments to the Assessment Schedule, so that DOA can distribute the Final Assessment Schedule to the affected agencies within established timeframes.
3. Determine the final assessment to be included in the *Appropriation Act*.

Central Service Agencies

All central service agencies, or other agencies submitting data for inclusion in the full costing indirect cost allocation plan, will perform the following functions:

1. Provide required data to DOA in a timely manner, accompanied by the standard SICAP certification form signed by the agency head or his or her designee, attesting to the integrity of the data.
2. Maintain work papers supporting data provided to DOA, for a period of three years, commencing with the submission of data to DOA.
3. Make available all related work papers, upon request, to DOA and Auditor of Public Accounts.

Agencies & Institutions

Agencies and institutions, **except institutions of higher education**, must do the following:

1. Develop operating budgets and budget requests based on full costs. Full costs must include direct costs, agency indirect costs, and statewide indirect costs. The statewide indirect costs to be used must be from the most recent full-costing SICAP available at the time of the development of the budget.
2. When applicable, maintain complete working papers supporting the development of user fees based on full-costing methods.
3. Reimburse the General Fund, as directed in Section 3-1.01 of the *Appropriation Act*, for central service agency General Fund support associated with nongeneral, nonfederal fund activity.

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Procedures, Continued

Exemptions and Adjustments

DPB is responsible for granting all exemptions and adjustments to the Potential General Fund Support on the Assessment Schedule. DOA will make adjustments to the SICAP allocation methodology only if a material error is found. No exemptions or adjustments are granted by DOA.

Agency Request for Adjustment


Agencies that believe extenuating circumstances exist and are not reflected in their allocation of statewide indirect costs should contact the assigned DPB analyst. DPB will then evaluate the concern and determine the adjustment, if any, which should be made to the assessment. For example, reimbursement of special revenue fund expenditures by federal funds (e.g., Medicaid payments to mental health facilities) is an extenuating circumstance that may require an adjustment to the statewide indirect cost allocation amounts.

Department of Planning and Budget Evaluation

Prior to development of the Executive Budget proposal and the recommendations for cost recovery transfers detailed in Section 3-1.01 of the *Appropriation Act*, DPB evaluates the impact that transferring statewide indirect cost recoveries to the General fund would have on each affected agency. DPB may determine that the expenditure of program dollars to reimburse the General fund for statewide indirect costs will have a detrimental programmatic effect on an agency. If so, that agency will not be required to reimburse the General fund for statewide indirect costs and the amount recovered will not be shown as a transfer in the *Appropriation Act*.

Transfers

Agencies that are able to recover statewide indirect costs will remit into the General fund the assessed amount of statewide indirect cost through a cash transfer. The State Comptroller will affect this annually, as required by the *Appropriation Act*, Section 3-1.00, "Transfers."

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Internal Control

Internal Control

Agencies and institutions that accept grants and contracts should implement internal control procedures to ensure the following:


- Unallowable costs have not been charged to federal awards either directly or indirectly.
- The agency organizational structure has been reviewed to determine the appropriate proposal methodology.
- An indirect cost rate proposal or cost allocation plan has been prepared according to requirements set forth in 2CFR, Part 200, *the Uniform Guidance*.
- The completed indirect cost rate proposal or cost allocation plan has been submitted, negotiated, and approved by the cognizant agency in a timely manner.
- The approved indirect cost rate or amount has been applied against grant awards.
- The indirect cost recoveries and transfer entries have been recorded in Cardinal correctly and in a timely manner.
- The work papers to support the development and application of indirect cost proposals and/or cost allocation plans and the recovery of indirect costs have been retained.
- Documentation is maintained concerning the restriction or prohibition of indirect cost recovery from federal grants and contracts

Records Retention

Records Retention

Maintain indirect cost rate proposals or cost allocation plans, financial records, and support for three years beginning at the close of the fiscal year covered by the rate plan. Documentation supporting the agency's recovery of statewide indirect costs associated with nongeneral, nonfederal funds, or the prohibition thereof, must be maintained at the agency for a period of at least three years, or until the completion of a review by the Auditor of Public Accounts, whichever is longer. If undergoing audits, claims, or litigation, retain documentation until completion.

- Destruction of records should occur in accordance with policies and procedures from the Library of VA.
- References for recordkeeping requirements can be found in the *Uniform Guidance*.

Volume No. 1 – Policies and Procedures	TOPIC NO. 20705 – Cardinal
Section No. 20700 – Indirect Cost Recovery	TOPIC Indirect Cost Recovery
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DOA Contact

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Subject Cross References

Subject Cross References CAPP Topic No. 20205, *Deposits*
 CAPP Topic No. 21005, *Records and Retention*
Appropriation Act Section 3-1.01 and 4-2.03
