



Supplemental Appropriation Transfer Guide

An Additional Help for ADS Chapter 634

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I. Overview

- A. The purpose of this Supplemental Appropriation Transfer Guide (“the Guide”) is to clarify Agency roles and responsibilities for supplemental appropriation transfers. Appropriation transfers are *budgetary* transactions authorized by an appropriation to *transfer* budget authority from one appropriation or account to another; this includes supplemental authorities for funds appropriated that may be used to *reimburse* accounts for obligations incurred prior to enactment to address the purposes provided in a supplemental appropriation.¹
- B. The Guide does not apply to other transactions referred to in statutes, regulations, Office of Management and Budget (OMB) Circulars or the Automated Directive System (ADS) as a “*reimbursement*”, such as reimbursable agreements, which are Agency agreements between two agencies for goods and services and payment to the agency filling the order, [31 U.S.C. 1535](#)).
- C. The Guide complements existing budget and finance policy located in OMB [Circular A-11](#) and the Department of the Treasury’s [Treasury Financial Manual \(TFM\)](#), as well as Agency-specific budget and finance policy in [ADS Functional Series 600, Budget and Finance](#).

II. Primary Responsibilities

- i. Organizational units integral to the implementation of the Guide and supplemental appropriation transfers are the offices of:
 - i. (1) Budget and Resource Management (BRM);
 - ii. (2) Management Bureau/Office of the Chief Financial Officer (M/CFO);
 - iii. (3) Office of U.S. Foreign Assistance Resources (F);
 - iv. (4) Office of General Counsel (GC);
 - v. (5) Bureau of Legislative and Public Affairs (LPA);
 - vi. (6) the lead regional or pillar bureau(s) managing the programs related to the supplemental appropriation.
- ii. BRM is the operating unit responsible for maintenance of the Guide and for oversight of its implementation.

¹ Supplemental Appropriation: An act appropriating funds in addition to those already enacted in an annual appropriation act. Supplemental appropriations provide additional budget authority usually in cases where the need for funds is too urgent to be postponed until enactment of the regular appropriation bill. Supplementals may sometimes include items not appropriated in the regular bills for lack of timely authorizations. (GAO definition glossary)

- iii. *Certain decisions may not be delegated below the Assistant Administrator/Office Director.* These decisions are specified in the Guide.
- iv. BRM in consultation with relevant bureaus and offices informs M/CFO upon determination that obligations may be subject to reimbursement to issue an accounting tagging code to identify such obligations.
- v. GC provides legal interpretation of the emergency or other supplemental authorities² to distribute to the affected bureaus.
- vi. BRM in consultation with relevant offices distributes policy guidance and coding information based on GC legal guidance and M/CFO feedback, and distributes and maintains a reimbursement tracker that is populated by implementing bureaus.
- vii. M/CFO maintains the Agency's accounting system of record (currently Phoenix), records the Agency's Appropriations, submits and records Agency Apportionments (SF-132s), and determines the "tagging" Operating Unit Definition (OUD) code(s) (), in consultation with BRM and F (see section III(b)).
- viii. Relevant regional or pillar bureaus analyze pre-enactment obligations and forward reprogramming memos and updates to the reimbursement tracker to BRM, F and CFO.
- ix. F approves action memos to program supplemental funds for transfers and reimbursements.
- x. F coordinates with BRM on the preparation of the "Appropriation Transfer Memo", and with M/CFO on the details of the Apportionment requests; F also allots funds in the accounting system after analysis, in consultation with BRM and the relevant regional and pillar bureaus.
- xi. The USAID CFO reviews and approves the "Appropriation Transfer Memo", prepared by BRM and F.
- xii. LPA leads the submission of Congressional Notifications and organizes Congressional briefings as required.
- xiii. Other bureaus will be included based on the specific activities subject to potential *reimbursement* through an appropriation transfer. When appropriate, the other bureaus must also analyze pre-enactment obligations and prepare reprogramming memos.

III. Procedures

- A. Determination of appropriation accounts (inclusive of separate appropriations within the same account, i.e. SF-132, Category A or B Line Splits) subject to potential *reimbursement*, for obligations incurred pre-enactment, through an appropriation transfer.
 - i. In consultation with F and other relevant bureaus and offices, BRM determines which accounts should be tagged and report on obligations incurred, for which purposes, and when such tagging and reporting into the Tracker should begin.

² Acts appropriating funds for national or international emergencies such as natural disasters or urgent national security events are typically designated "emergency supplemental." (GAO Definition glossary)

- ii. BRM makes these determinations on the basis of declared emergencies or other actions or policy decisions that might lead to a supplemental appropriation with reimbursement authority. Other relevant bureaus or offices may also request that BRM make such a determination.
 - iii. BRM notifies all relevant bureaus and offices of its determination and provides necessary guidance to begin tagging and reporting into the Tracker on appropriate obligations.
- B. Identification/tagging and reporting on obligations incurred pre-enactment in Phoenix, inclusive of the appropriation account that incurred the pre-enactment obligations, subject to potential *reimbursement*. See “Supplemental Procedure for “Tagging” Potentially Reimbursable Transactions”.
- C. Inclusion of *reimbursement* authorization (appropriation transfer authority) in a supplemental appropriation request or budget amendment.
- i. If a policy determination is made to seek *reimbursement* authority, GC coordinates with LPA, M/CFO, F and affected operating units, as necessary, in drafting language to submit to the Office of Management and Budget (OMB). If *reimbursement* authority is also sought for accounts administered by other agencies, GC leads language negotiations for USAID with the other agencies and OMB.
- D. Review and analysis of *reimbursement* authority (appropriation transfer authority) in an enacted appropriation.
- i. Upon enactment of legislation that includes *reimbursement* authority, GC provides M/CFO, F/RA, BRM, and LPA an analysis of the authority for USAID.
 - ii. BRM, in consultation with and clearance by GC and M/CFO, issues guidance as appropriate to relevant operating units relating to such *reimbursement* authority.
 - iii. The lead bureau(s) performs an analysis of the obligations incurred pre-enactment to validate their eligibility for *reimbursement*. This analysis is conducted using the guidance provided by BRM (above). Based on this analysis, bureaus develop reprogramming memo(s), which also must be done in accordance with existing F/RA and BRM guidance. Reprogramming memos should be completed for all “*reimbursements*”, including those different reimbursable obligations within the same Treasury Account.
 - iv. F, M/CFO, and BRM analyze the reprogramming memos and pre-enactment obligations to identify eligible reimbursements.
- E. Policy determination on the extent of *reimbursement* of relevant accounts
- i. Once the reprogramming memos and reimbursement tracker from the Bureau(s) are received in F and BRM to draft a joint Appropriation Transfer Memo, cleared by M/CFO, F, BRM and GC and others bureaus and offices as relevant for the CFO advising as to the amount of funding approved by F for reimbursement, and recommending the

appropriations (by title), the fund accounts (by Treasury Symbol), and the amounts to be reimbursed from the supplemental appropriation, with confirmation that the proposed *reimbursement* is consistent with the specific *reimbursement* authority contained in the supplemental appropriation and the advice of relevant offices and bureaus. (This office/bureau clearance must be at the Assistant Administrator/Office Director level, and is NOT a delegable clearance)

- ii. In addition to the amounts eligible for *reimbursement* and the specific *reimbursement* authority, and if allowed by the *reimbursement* authority, BRM and F take into account the estimated requirements that the supplemental appropriation was intended to address, and the estimated requirements that the funds eligible for *reimbursement* were diverted from, in reaching their recommendation.
- iii. F and CFO consult or meet as needed to reach a determination on the amounts to reimburse, and may ask BRM, the CFO and F to provide additional options, analysis or information in order to inform their decision.
- iv. Once F and CFO reach a decision, documented through an F approved Action Memo to program funds for reimbursement, BRM and F provide copies to LPA, M/CFO and other relevant offices and bureaus. This initiates the drafting of the CFO Action Memo and the notification and *reimbursement* processes described in paragraphs F and G.

F. Notification of Appropriation Transfer (*reimbursements*) to Congress

- i. BRM manages the clearance process and should follow standard protocol for CN clearances. LPA is responsible for final clearance and transmittal of the CN.

G. Execution of Appropriation Transfer (*reimbursements*)

- i. M/CFO begins the appropriation transfer process upon receipt of the CFO's approved Appropriation Transfer Memo. M/CFO prepares and submits the SF-132(s) for OMB's approval, and records the appropriation transfer upon receipt of OMB's approved SF-132(s). M/CFO informs F/RA and BRM once the approved SF-132(s) has been recorded in Phoenix.

IV. References

- a. [31 U.S.C. 1501\(a\)](#)
- b. [31 U.S.C. 1535](#)
- c. [OMB Circular A-11](#)
- d. [Treasury Financial Manual](#)
- e. [USAID ADS Functional Series 600, Budget and Finance](#)