* In December 2019, RFA requested that USAGM allow RFA to transfer funds directly to OTF through an inter-grantee transfer. USAGM's CFO denied the request and instructed RFA that they must send the funds back to USAGM so that USAGM could add them to OTF's grant agreement: "I conferred with GC and the Grants Team, and the best way forward is for RFA to send back the funds to USAGM and for USAGM to put them on the new grant agreement (or any subsequent amendment to it)."
* In February 2020, OTF followed up with USAGM again and requested that RFA be allowed to transfer funds to OTF through an inter-grantee transfer. USAGM again denied the request and pointed OTF back to the guidance provided in December. USAGM then directed RFA and OTF to take the following actions:
	+ "This transition plan should be addressed in the Internet Freedom Spend Plan due to the Hill on No Later Than March 19, 2020 (which is 90 days after Enactment). This transfer should be a part of a full plan to transition Prior Year (PY) funding from RFA’s OTF Program (An Account) to the Newly established OTF Non-Federal Entity (Organization). Currently, the RFA OTF Program has 12.9 million dollars cash-on-hand, of which 5.9 million is unobligated in PY funds as of January 31, 2020. The following steps need to occur in order to transfer funding from RFA to OTF:
		1. The RFA’s CFO needs to confirm and validate unobligated balances of the remaining funds based of reporting submitted as of January 31, 2020, making any transaction auditable;
		2. The accounting for PY funding needs to be reported by fiscal year for the sole purpose of amending the PY Grant Agreements for each fiscal year. Currently RFA is reporting funding across three fiscal years: FY17 through FY19;
		3. RFA’s CFO needs to review the currently reported 7.5 million in Unliquated Obligations (ULOs) to determine if these obligations are still valid and whether or not these funds should be deobligated and added to the current unobligated balance of funds for transfer to OTF;
		4. No-Year funds will need to be recaptured to the agency and be reapportioned and rewarded to the newly established OTF Organization to fulfill the same purpose. Because the funding is No-Year, there is no issue with a recapture by the Agency and a reward to the OTF."
* In June 2020, OTF and RFA completed all the steps required by USAGM to enable the transfer of funds.
	+ **Board approval:**On March 12, 2020 both OTF and RFA's Board of Directors adopted resolutions "Approving Independent Auditor Certification of RFA financial migration to OTF."
	+ **"This transition plan should be addressed in the Internet Freedom Spend Plan":**On April 3, 2020, USAGM submitted it's FY2020 Internet Freedom Spend Plan to Congress stating, "Radio Free Asia (RFA) has engaged the services of its auditors, Calibre CPA Group to review the open contracts on RFA’s financial records as of May 31, 2020. Upon completion of this review, any unobligated and obligated funding, along with any unused portion of the $1.2 million for associated staffing costs during the transition will be transferred to OTF. The estimated completion of this review is mid-June."
	+ **RFA and OTF execute contract assignment agreement**: Pursuant to USAGM instructions, the FY2020 Internet Freedom Spend Plan that USAGM submitted to Congress, and RFA and OTF's Board resolutions, RFA and OTF executed a contract assignment agreement on April 17, 2020.
	+ **Migration of OTF staff:** As planned with RFA, all OTF program staff resigned from RFA on April 17, 2020 and were employed by OTF corporation on April 20, 2020.
	+ **"The RFA’s CFO needs to confirm and validate unobligated balances of the remaining funds based of reporting submitted as of January 31, 2020, making any transaction auditable"**: RFA confirmed and validated all unobligated balance of remaining funds and provided this information to the auditing firm on June 1, 2020.
	+ **"The accounting for PY funding needs to be reported by fiscal year for the sole purpose of amending the PY Grant Agreements for each fiscal year"**: RFA auditors completed the audit on June 17, 2020. RFA certified the audit and submitted updated SF-424 by fiscal year per USAGM instructions.
	+ **"RFA’s CFO needs to review the currently reported 7.5 million in Unliquidated Obligations (ULOs) to determine if these obligations are still valid and whether or not these funds should be deobligated and added to the current unobligated balance of funds for transfer to OTF"**: RFA auditors completed the audit on June 17, 2020. RFA certified the audit and provided a copy of the audit to USAGM on June 17, 2020.
	+ **USAGM enacts funding freeze but explicitly exempts the RFA/OTF migration**: On June 9, 2020 USAGM enacted a funding freeze for all grantees. However, on June 12, 2020 USAGM clarified in writing to OTF that OTF funds held by RFA are not subject to the freeze stating, “The Budget Director does not view the RFA/OTF migration as part of the freeze and should not be held up.”
* The final step in the process, per USAGM guidance is that: "No-Year funds will need to be recaptured to the agency and be reapportioned and rewarded to the newly established OTF Organization to fulfill the same purpose. Because the funding is No-Year, there is no issue with a recapture by the Agency and a reward to the OTF." As of today, USAGM has taken no actions to transfer these funds to OTF as promised.