3rd Annual Symposium for Research Administrators

Preparing for Project Closeout

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July 29, 2016
Lifecycle of a Sponsored Project

- **Pre-Award**
  - Project Development
  - Locating Opportunity
  - Requesting Funding

- **Award Acceptance**
  - Receipt of Funding
  - Acceptance of Requirements
  - Creation of Project

- **Post-Award**
  - Funding Renewals
  - Project Changes
  - Compliance monitoring
  - Obtaining Payment

- **Closeout**
  - Reconciliation of project expenses
  - Final Reporting Requirements
Federal Regulations – Reference

Uniform Guidance
200.343: Closeout
  (a): The non-federal entity must submit financial reports no later than 90 calendar days after the project end date
  (b): The non-federal entity must liquidate all obligations incurred no later than 90 calendar days after the project end date

NIH Notice: PMS Subaccounts
NOT-OD-13-120
  PMS will hold payment requests for funds in subaccounts for awards that are 90 days or more beyond the project period end date
  Fund requests for these awards will not be processed unless, and until, the awarding agency has approved the payment request
NIH Grants Policy Statement

8.6 Closeout

Recipients must submit a final FFR, final progress report, and Final Invention Statement and Certification within 120 calendar days of the end of the period of performance (project period). The reports become overdue the day after the 120 calendar day period ends.
Federal Regulations – Impact

The Uniform Guidance and the NIH notice on Subaccounts requires UNC to submit final billing to the sponsor within the 90 day closeout period. While the filing of reports has historically been required within 90 days after the end date of the project, final billings have not been required within this time frame.

The Grants Policy Statement from the NIH allows for all reporting to be completed within 120 days. It is widely expected that all agencies will adopt the 120 closeout timeframe.
Phases of Post Award Financial Management

Active Award Management

Final Invoice/Report and Closeout
Active Award Management

The light at the end of the tunnel
What you should be doing
Understanding Payment Methods for your Award

- Federal LOC Drawdown
- Cost Reimbursable
- Installment
- Deliverable Based
Federal Drawdown and Cost Reimbursable

Both
- You have to spend it to get it
- Report and invoice to actual expenses posted in ConnectCarolina

Federal LOC Drawdown
- OSR Cash Management draws down the funds from the Federal source as expenses are posted in ConnectCarolina

Cost Reimbursable
- OSR submits invoice to sponsor for reimbursement
Installment and Deliverable

Both
- Have payment schedule or terms for reimbursement
- A report of actual expenses may be required

Installment
- Pays in lump sum or on a predetermined timeline
- May or may not get to retain unused funds

Deliverable
- Pays when a milestone is met or Specific activity is completed
- OSR can’t invoice until confirmed deliverable is met by the department
- May or may not get to retain unused funds
Things that should happen before the end date of the project

- **No Cost Extension**
  - If needed the PI should request an NCE at least 30 days prior to the end date, or earlier if required by the sponsor.

- **Budget Revision**
  - 90-30 days before the end date the department should review expenses and see if a budget revision is needed.

- **Cash Advances**
  - All cash advances should be reconciled.

- **Cost Share**
  - Makes sure Cost Share is met and recorded.
Proposed Closeout Timeline – Before Project End Date

Closeout Timeline – Prior to Project End

<table>
<thead>
<tr>
<th>Recipients</th>
<th>Project Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Principle Investigator</td>
<td>Project Start – 0 Days Prior to Project End: <strong>OPEN</strong></td>
</tr>
<tr>
<td>Department Administrator</td>
<td>1 Day After Project End: <strong>ENDED</strong></td>
</tr>
</tbody>
</table>

**Timeline**

- **90 Days – 1st Notice** (for 90 – 61 Days to Project End)
- **45 Days – 2nd Notice** (for 60 – 31 Days to Project End)
- **7 Days – 3rd Notice** (for 30 – 0 Days to Project End)
Final Invoice/Report and Closeout
The end date of the project has passed
# Proposed Closeout Timeline – After Project End Date

<table>
<thead>
<tr>
<th>Responsible Party</th>
<th>Timeline</th>
<th>Project Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>0 – 30 Days After Project End</strong></td>
<td><strong>Day 30:</strong> OSR - Provide Comparison to DA</td>
<td>Day 1 – 60: ENDED</td>
</tr>
<tr>
<td></td>
<td><strong>Day 60:</strong> DA – Provide Review to OSR</td>
<td>Day 61 – 120+: REPORTING</td>
</tr>
<tr>
<td><strong>31 – 60 Days After Project End</strong></td>
<td><strong>Day 90:</strong> OSR – Reviews DA package &amp; submits FFR</td>
<td>&gt; Day 120+: CLOSED</td>
</tr>
<tr>
<td><strong>61 – 90 Days Project End</strong></td>
<td><strong>Day 120+:</strong> OSR – Closeout in ConnectCarolina</td>
<td></td>
</tr>
<tr>
<td><strong>91 – 120+ Days After Project End</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
# Project Status Configuration

<table>
<thead>
<tr>
<th>Expense/Status</th>
<th>OPEN</th>
<th>ENDED</th>
<th>REPORTING</th>
<th>CLOSED</th>
<th>HOLD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salary</td>
<td>Allow</td>
<td>Allow</td>
<td>Reject</td>
<td>Reject</td>
<td>Reject</td>
</tr>
<tr>
<td>Requisition</td>
<td>Allow</td>
<td>Reject</td>
<td>Reject</td>
<td>Reject</td>
<td>Reject</td>
</tr>
<tr>
<td>PO</td>
<td>Allow</td>
<td>Reject</td>
<td>Reject</td>
<td>Reject</td>
<td>Reject</td>
</tr>
<tr>
<td>AP Voucher</td>
<td>Allow</td>
<td>Allow</td>
<td>Reject</td>
<td>Reject</td>
<td>Reject</td>
</tr>
<tr>
<td>Journal Entry</td>
<td>Allow</td>
<td>Allow</td>
<td>Reject</td>
<td>Reject</td>
<td>Reject</td>
</tr>
<tr>
<td>Data Collect Batches (e.g. recharges)</td>
<td>Allow</td>
<td>Allow</td>
<td>Reject</td>
<td>Reject</td>
<td>Reject</td>
</tr>
<tr>
<td>Budget</td>
<td>Allow</td>
<td>Allow</td>
<td>Warn</td>
<td>Reject</td>
<td>Reject</td>
</tr>
</tbody>
</table>
As part of the Final Invoice – Report, the Closeout Checklist (CC)

- The Closeout Checklist must be submitted within 60 days after the end of a project.
- The Closeout Checklist will include a section for exceptional items that should be reported or invoiced (i.e., outstanding sub award invoice).
- Any transactions must be submitted for approval in Connect Carolina.
- Any transactions included on the Closeout Checklist must be approved and posted within 120 days after the end of a project; if not then OSR will revise the FFR downward and/or process a refund to sponsor.
In the event the Closeout Checklist is not submitted within 60 days after the end of the project, OSR will

- Perform a cursory review of the expenditures in Connect Carolina
- Exclude any expenditures deemed unallowable, or unreasonable
- Prepare the Financial Report or invoice based on information resulting from this review
Payroll Suspense and the New Processes

September 1
- New Closeout Process will be implemented, including:
  - Replacement of the NOTR with the Closeout Checklist
  - Payroll that is charged to Projects with a Reporting or Closed Project Status will be sent to payroll suspense

November 1
- Funding end dates will be treated as hard end dates in the payroll distribution process and payroll that is charged will be sent to payroll suspense
Email address for Billing, Closeout, and Research Admin

osrbilling@unc.edu
osrcloseout@unc.edu
resadminosr@unc.edu
Any Questions