Closeout Management
UNC Symposium for Research Administrators
August 3, 2017
UNC Symposium for Research Administrators

Presenters

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  Office of Sponsored Research

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  Sponsored Projects Accountant
  Office of Sponsored Research
Project Closeout

Presentation Agenda

• Compliance and Administration
• Roles and Responsibilities
• What you can do to help?
• Tools to enable Closeout Process
• Questions
What is Award Closeout?

Process to finalize all sponsor requirements at the conclusion of the awards time period

• Each award will detail the requirements but typically these include:
  – Final Technical/Progress Report
  – Final Invention and Patent Report
  – Equipment/Property Report
  – Final Fiscal Report
  – Closeout Certification Forms
Why are Closeouts Necessary?

Ensuring Compliance

Uniform Guidance 2 CFR § 200.343

a) The non-Federal entity must submit, no later than 90* calendar days after the end date of the period of performance, all financial, performance, and other reports as required by or the terms and conditions of the Federal award.

b) Unless the Federal awarding agency or pass-through entity authorizes an extension, a non-Federal entity must liquidate all obligations incurred under the Federal award not later than *90 calendar days after the end date of the period of performance as specified in the terms and conditions of the Federal award.

*NIH and NSF have adopted 120 days.

** While federal agencies provide 90 days for reports to be submitted, subawards from other institutions as well as other sponsoring agencies (i.e., state and foundation awards) are often less.
Why are Closeouts Necessary?

Reduce Audit Risk
• Ensure financial report submitted matches general ledger
• Ensure expenditures are valid (allowable)
• Prevent additional unallowable charges from posting

Reporting to UNC-GA (UNCFIT)
• Timeliness of closeouts is a “Key Performance Indicator”
  – Monthly reporting requirement of outstanding closeouts
  – Reviewed by UNC System President
  – Progress communicated to UNC Chancellor and VC for Finance quarterly
Why are Closeouts Necessary?

• Sponsors may withhold incremental funding or final payments until all outstanding financial and progress or technical reports are received.
• Awards not issued under FDP or expanded authorities could lose carryover funds.
• Cash Draw Process and Subaccount Integration
  – Agency & Payment Management Groups are/planning to enforce limitations on drawdowns after 90 days after end-date. (PMS will hold payment request until agency authorizes payment after 90 days past award end-date).
  – Agency can proceed to a unilateral closeout if the grantee is non-communicative. (If final financial report is not submitted on time agency can close at the last draw amount for the subaward).
  – FAQ NIH Transition to subaccount cash draws [http://grants.nih.gov/grants/payment/faqs.htm#3815]
Why are Closeouts Necessary?

NIH Guide Notice NOT-OD-13-120

NIH Domestic Awards to Transition to Payment Management System Subaccounts in FY 2014 and FY 2015

Award Closeout

The University has an obligation to sponsors and funding agencies to bring funded projects to closure in a timely manner.

- The award closeout process is a **collaborative effort of all parties involved** (OSR, PI, and Department staff) in ensuring all project work has been completed, required reports filed, and financial matters resolved.
- Closing policies, procedures, and required documentation vary depending on the sponsoring agency; therefore, it is difficult to initiate a single closing form or procedure as a general guideline. Read your award!
## Roles and Responsibilities

<table>
<thead>
<tr>
<th>Role</th>
<th>Expenditures</th>
<th>Project Changes</th>
<th>Financial Invoicing</th>
<th>Reporting &amp; Technical Reporting</th>
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</table>
| Principal Investigator   | • Clearly state destination of expenses to department personnel (especially in case of multiple awards)  
  • Ensure expenses are allowable per sponsor and institution regulations/guidelines | • Communicate changes in project scope or timelines  
  - No cost extension request  
  - Continuations  
  - Rebudgeting | • Provide final review/approval of costs being invoiced and reported | • Complete all project objectives stated in award document  
  - Progress reports  
  - Final Deliverable |
| Department – PI’s Supporting Unit | • Ensure expenses are allowable per sponsor and institution regulations/guidelines  
  • Ensure expenses are charged/posted to appropriate project | • Assist PI in making project changes  
  • Communicate progress towards project objectives within stated timeline | • Assist PI in review of invoices/financial reports and notify of any incorrect charges | • Assist PI in completion and submission of technical reports  
  • Ensure PI compliance with technical reporting requirements |
| Sponsored Research Office | • Timely approval/review of expenses requiring authorization  
  • Ensure expenses are allowable per sponsor and institution regulations/guidelines | • Assist PI in making changes to project scope timelines  
  - Submit NCE/ continuation requests  
  - Make appropriate changes to dates/budgets in financial system | • Prepare and submit accurate invoices/financial reports based upon schedule in award document | • Expedite submission of Final Invention Statement  
  • Follow up with PI and Dept. Administrator on Sponsor requests for missing, final invention statements, financial or technical reports |
# Project Status Configuration

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Closeout Process

**Prior to the Project End Date**
- **90 Days**
- **45 Days**
- **7 Days**

- **RAMSeS Automatic Notification**
- **RAMSeS Automatic Notification**
- **RAMSeS Automatic Notification**

**After the Project End Date**
- **0-60 Days**
- **61-90 Days**

**Departamental Tasks**
1. Receives Notifications
2. Reviews spending on project
3. Requests No Cost Extension, if needed

**Tasks**
- **Department**
  - Review Expenses
  - Removes Overruns
  - Prepares Technical Report
- **OSR**
  - Reviews Expenses
  - Removes Overruns if Department has not
  - Submit Final Financial Report / Final Invoice
What can you do to help?

**Review expenses periodically (at least monthly) to ensure:**
- Budget on the account has not been exceeded
- Funds are used appropriately (allocable, allowable, reasonable)
- Anticipated personnel is being charged to the account
- Cash advances have been reconciled
- Confirm cost share is met and recorded
- Remove any unallowable expenses or expenses over award limit
- Initiate residual fund transfer (after final report has been prepared) if applicable

**Apply for award deadline extension well in advance of 90-day budget period deadline**
Current Tools

Facilitating Closeout

The Closeout Checklist

- Official certification of expenses by department and PI
- The Closeout Checklist must be submitted within 60 days after the end date 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
Sample Closeout Reminder

Date: 10/7/2016

PS Project ID: 5103315
Project Title: Mechanisms of cell migration on aligned matrices
Sponsor: University of Wisconsin at Madison
Dept: Pharmacology
End Date: 11/20/2016
PI: Klaus Hahn
PS Project ID Manager: Edward Gill Jr, Patty Holloway, Tangi Covington, Andrew Hou
CC Closeout Submitters: Patty Holloway, Tangi Covington, Andrew Hou
CC Closeout Approvers: Edward Gill Jr, Patty Holloway, Tangi Covington, Andrew Hou

This Closeout reminder notification has been automatically generated as a result of a routine review of RAMSeS PS Project ID records. The above-referenced PS Project ID has 45 days remaining before its current end date of 11/20/2016.

As mentioned in the initial closeout notification sent 45 days ago, OSR has requested that you review your project carefully during the next 45 days. A checklist to help facilitate the project closeout process is appended below. All expenditures must be valid, supportable charges to the project and will need to be processed, and outstanding obligations cleared, by the end date. Please ensure that you do not overspend or incur expenses past the end of the project. Necessary corrections should be made as soon as possible. Cost transfers received at OSR more than 60 days after the Project End Date will only be considered in rare instances due to financial reporting requirements.

IMPORTANT: As a reminder, it is the responsibility of the prime PS Project ID department to ensure timely closeout of all associated sub-PS Project IDs, including those where the administering department is different from the prime’s. Also, it is imperative that subrecipients are actively engaged by you and/or your team during the closeout timeline to ensure invoices are submitted and processed in a timely manner.

Also as a reminder, one Closeout submission record has been generated in RAMSeS and may be accessed by Closeout Submitters in the Prime department via the “Closeout Submissions” inbox on the RAMSeS Award dashboard. Submission of this Closeout record is required no later than 60 days from the end date, and certifies that all expenditures have been posted to ConnectCarolina for the prime PS Project ID, and all subs. The Closeout submission record must be submitted even if your PS Project ID won’t be closing out at this time. (If no closeout is needed, follow instructions on the Closeout submission record indicating the reason.) 

NOTE: Submissions are no longer required for each individual PS Project ID/Sub.

If you feel you received this notification in error or if you have any questions, contact OSR at resadminosr@unc.edu. For technical questions or issues, contact the ORIS Help Desk (919-843-2594). Please do not reply to this system-generated email. OSR appreciates your cooperation in working together to streamline the closeout process.
Sample Closeout Reminder

Closeout reminder email
Date:
PS Project ID:
Project Title:
Sponsor:
Dept:
End Date:
PI:
PS Project ID Manager:
CC Closeout Submitters:
CC Closeout Approvers:

This FINAL Closeout reminder notification has been automatically generated as a result of a routine review of RAMSeS PS Project ID records. The above-referenced PS Project ID has 7 days remaining before its current end date of 6/30/2017.

As requested by OSR, within the next the next 7 days you should be making any necessary final preparations for project closeout. A checklist to help facilitate the project closeout process is appended below. All expenditures must be valid, supportable charges to the project and will need to be processed, and outstanding obligations cleared, by the end date. Please ensure that you do not overspend or incur expenses past the end of the project. Necessary corrections should be made as soon as possible. Cost transfers received at OSR more than 60 days after the Project End Date will only be considered in rare instances due to financial reporting requirements.

IMPORTANT: As a reminder, it is the responsibility of the prime PS Project ID department to ensure timely closeout of all associated sub-PS Project IDs, including those where the administering department is different from the prime's (list of subs appended below). Also, it is imperative that subrecipients are actively engaged by you and/or your team during the closeout timeline to ensure invoices are submitted and processed in a timely manner.

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CLOSEOUT CHECKLIST

1. Have you determined what your future expenditures will be?
   • Do you have enough remaining funds to meet these expenditures?
   • Do you have personnel that are being paid from this project that need to be reallocated to other efforts?
   • Have you considered the related charges of employee benefits and F&A costs?
   • Have you considered recent charges not yet recorded on the ConnectCarolina reports?
   • If your project is in its terminal year, do you require a no-cost extension? If so, please contact OSR at resadminosr@unc.edu.
   • Do you need a Project Financial Guarantee set up for your new award? If so, please contact OSR at resadminosr@unc.edu.
   • If your award is from DHHS, will there be a positive balance which is available for carryover? If so and the amount is over 25 percent of your current award, please mention the estimated balance in your continuation/renewal application form. If your award does not authorize carryover, please contact OSR at resadminosr@unc.edu for instructions on applying for agency approval of carryover.

2. Have you reviewed all previous ConnectCarolina reports for errors?
   • Are the charges valid and supportable?
   • Are any charges missing which should be reflected in the project?
   • Any correction should be initiated as soon as possible. Due to financial reporting requirements, cost transfers received at OSR 60 days after the Project End Date will only be considered in rare instances.

3. Have you overspent or anticipate that you may overspend any restricted budget categories?
   • Have you requested rebudgeting for any overages?

Sub PS Project IDs Associated with this Prime:

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<tr>
<th>PS Project ID</th>
<th>Dept</th>
<th>Budget Begin Date</th>
<th>Budget End Date</th>
<th>Project End Date</th>
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Current Tools

Facilitating Closeout – BI Publisher GL Report

Query Report Viewer
Enter any information you have and click Search. Leave fields blank for a list of all values.

Search by Report Name begins with NC_OSR_GL

Search

Advanced Search

Search Results

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## Current Tools

### Facilitating Closeout

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Current Tools

Facilitating Closeout

Other Reporting Tools

• Infoporte
  – OSR Ledger Rollup
  – Grant Profile Tab
  – Grant Details Tab

• Connect Carolina
  – Budget Overview Inquiry
OSR Contacts

Sponsored Projects Accounting

Contact one of the following if you have questions:

- Sponsored Project Accounting Managers
  - David Morgan (morgan78@email.unc.edu)
  - Bettina Lampkin (blampkin@email.unc.edu)
  - Ryan Hermreck (hermreck@email.unc.edu)

- Sponsored Project Accountant assigned to the Project
  - RAMSeS Billing Tab under Award Project

- Jenifer Gwaltney (j_gwaltney@unc.edu)
  Assistant Director, Sponsored Project Accounting

- Jim Kelly (jpkelley@email.unc.edu)
  Assistant Director, Sponsored Project Accounting

- Lou Harrell (louharre@email.unc.edu)
  Director, Post Award and Cash Management
Questions?