

### OFFICE OF THE VICE CHANCELLOR FOR RESEARCH

# Research Administrators Monthly Meeting March 2021

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# **OSP Announcements**

- Team leads in pre-award
- FY20 Sponsored Program Expenditure Reports are available <u>https://research.uic.edu/sponsoredprogra</u> <u>ms/sponsored-program-expenditure-</u> <u>reports/</u>



# Sponsored Project Closeout



# Agenda

- Closeout Presentation
  - Objective: To understand overall closeout process and to provide general guidelines to follow in order to facilitate timely closeout
- Questions/Discussion







# **Sponsored Project Closeout**

The University of Illinois System has a responsibility to close out completed sponsored projects in compliance with federal regulations, sponsor policy, and award terms and conditions.

- Closeout process is a collaborative effort of all parties involved (i.e., principal investigators, administrators, and OSP.
- Closing procedures, required documentation, and timeline vary depending on the funding agency. Read the terms and conditions of your award.
- This involves reviewing project expenditures, resolving open commitments, ensuring subcontract invoices have been received and paid, removal of unallowable cost including overdrafts and preparing required final reports and deliverables for submission to the sponsor.



# Why are timely closeouts necessary?

### Uniform Guidance 2 CFR § 200.344 Closeout

"(a) The non-Federal entity must submit, no later than <u>120</u> <u>calendar days</u> 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. The Federal awarding agency or pass-through entity may approve extensions when requested by the non-Federal entity."

Note: Some awards may have a shorter closeout period based on their specific terms and conditions.



# Why are timely closeouts necessary?

#### Avoid unfavorable audit finding

- Labeled as high-risk auditee
- Increased monitoring and oversight
- Loss of funding
- Corrective action planning (i.e. changes in processes and procedures
- Potential non-payment
- Repayment of funds
- Loss of current and/or future funding
- Compromise institution's reputation
- Compromise expanded authorities



# Grants Oversight and New Efficiency (GONE) Act

### NIH

- Recipients must submit closeout documents 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 (NIH Grants Policy Statement <u>Section 8.6</u>).
- <u>NOT-OD-18-107</u>

### NSF

 Grants will be financially closed out on the first day of each month for all awards with end dates of 120 or more days prior to the financial closeout day



## **Special Emphasis on HHS Award Closeout**

- UG §200.344 requires us to close out awards within 120 days after project end
- NIH may initiate unilateral closeout if timely accurate reports are not submitted and NIH will close the award <u>at the lowest reported amount</u>
  - Cash draw amount
  - Final expenditure reported on federal financial report (FFR)
  - Final expenditure reported on federal cash transaction report (FCTR)



## **Special Emphasis on HHS Award Closeout**

• Timely closeout of an HHS award occurs when

Cash Draw = Final Expenditure Reported on FFR = Final Expenditure Reported on FCTR, within the projected timeline

How do we ensure everything matches on 3 different reporting mechanisms? Timing is critical – TAKE ACTION!

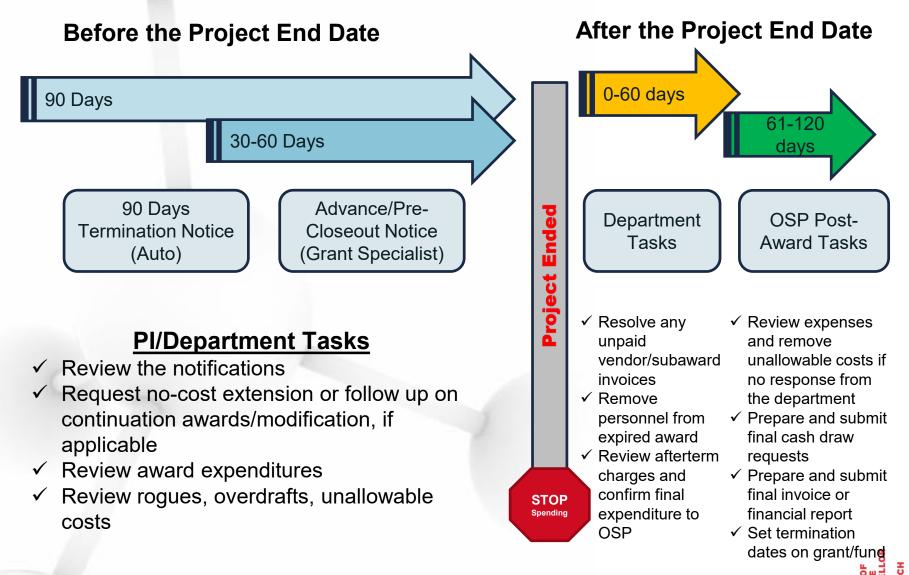


### **HHS Closeout Timeline**

Grant End	Final Expenditure Must be Posted in	Final FFR	
Date	Banner	Submission	
January	March	April	
February	March	May	
March	June	June	
April	June	July	
May	June	August	
June	September	September	
July	September	October	
August	September	November	
September	December	December	
October	December	January	
November	December	February	
December	March	March	



# **Closeout Timeline (who does what?)**





### **Example of 90 Days Termination Notice**

From: Sent: To: Subject: Attachments: OSP Post-Award Monday, February 15, 2021 9:47 AM Buglio, Virginia Hope 989: Terminating Awards - report by Org Term report\_989.xls

The Office of Sponsored Programs will begin the closeout process on the projects in the attached spreadsheet approximately 90 days from the date of this notice. University of Illinois at Chicago (UIC) is required by most sponsors to submit final financial and technical reports within 90-days after the project end date (some agencies may require earlier submission). Financial data in the spreadsheet is as of the most recent month closed.

#### IMPORTANT

If you are certain that a project is <u>NOT</u> ready to proceed to closeout, please notify the Grant Specialist assigned to that project immediately. Please use <u>Who Manages My Grant?</u> to find the Grant Specialist who manages your project.

If the project will end as scheduled, please follow the timeline below to ensure timely project closeout:

#### From -90 Days to Project End Date

Changes that need to be processed

Prepare to change HR appointments from grant C-FOAP to other appropriate C-FOAPs

#### Expenses related to the project

- Ensure that all project-related expenses have posted
- Confirm that salaries have been charged according to the budget or within sponsor permitted re-budgeting authority
- Ensure that any committed cost sharing has been incurred and appropriately documented
- Identify and remove unallowable expenses
- Clear overdrafts, program advances, and rogue transactions
- Process any necessary cost transfers (journal vouchers or labor redistributions)
- Remind sub-recipients to submit final invoices and reports by due dates
- Identify outstanding invoices from vendors and purchases that have not arrived

#### From Project End Date to +45 Days

#### Changes that need to be processed

- Ensure that no active appointments are associated to the expired grant C-FOAP
- Update all service center accounts that are associated to the expired grant C-FOAP (e.g. telecom, BRL, RRC)
- Change P-card default C-FOAP
- Notify any other users of the fund that project has ended





# **Example of 60 Days Closeout Notice**

Dear [Name]

Above referenced project will end on 07/31/20 and I want to confirm with you that the project will end as scheduled. Assuming the project will end as planned, I have reviewed the award terms for final billing and reporting requirements, identified the rogue transactions and unallowable costs, and processed all necessary facility and administrative (F&A) and tuition remission (TR) adjustment in Banner. Below is a summary of my review:

#### Summary of my review:

Your F&A has been reviewed; no adjustments are needed.

Your TR has been reviewed; no adjustments are needed.

Total balance for the award (excluding encumbrances) as of 5/31/2020 is: \$88,231.18 (Direct \$.55,178.97) + (Indirect \$33,052.21).

#### Take action on the following:

**Open subawards** under encumbrances E0018941 and E0018942 are associated with this award. Be sure to contact each of your sub-recipients and have them submit their final invoice per the due date as outlined in the agreement.

**Open Purchase Order** (P1841770) is associated with this award. Ensure all outstanding invoices from vendors are paid 45 days after project end date.



## How can you help with a timely closeout?

### STOP SPENDING

- Review and reconcile expenses monthly to avoid surprises
  - all project personnel are being charged
  - cost share requirements are met
  - participant support costs are properly charged
  - no unallowable costs on the award
  - have supporting documentation for restricted costs
  - deficit is removed before award end date
  - plan for carryover if renewal award is expected



### How can you help with a timely closeout?

- Stay ahead of the closeout reminders/timeline
  - Think closeout at the time award is received
  - Read the award terms and understand the closeout requirements
- Communication is key amongst:
  - PI and project team
  - Research coordinators, grant managers and HR personnel
  - With service centers
  - With vendors and subcontractors
- Prevent late cost transfers





# Closeout Documents and Responsibilities

Document/Report Name	PI/Unit Business Office	Central Office (Pre-Award)	Central Office (Post-Award)
Final Financial Report			Х
Final Payment Request/ Invoice			Х
Collection of Outstanding Receivables			Х
Final Cost Sharing Certification	Х		Х
Property Report	Х		Х
Contractor's Release, Refund, Rebates, and Credits			Х
Final Technical/Progress/ Programmatic Report	Х	Х	
Final Invention Statement	Х	Х	
Final Patent Certification	Х	Х	



# **Common Issues/Barriers**

- Overdrafts
- Continuous spending
  - salary
  - service center charges (RRC, BRL, telecom)
- Subsequent Charges not posted timely
- Removing Costs after final invoice/FFR submission
- No signed cost share certification
- Open POs & incomplete invoices
- Payments tied to deliverables (late)
- Submission of Closeout Documents



# **Together We Can!**

### Help us help you

- To be a better steward in managing the sponsored projects for your programs
- OSP Post-Award would ideally like to be notified by <u>you</u> that your award is ready to be financially closed out and terminated in banner :

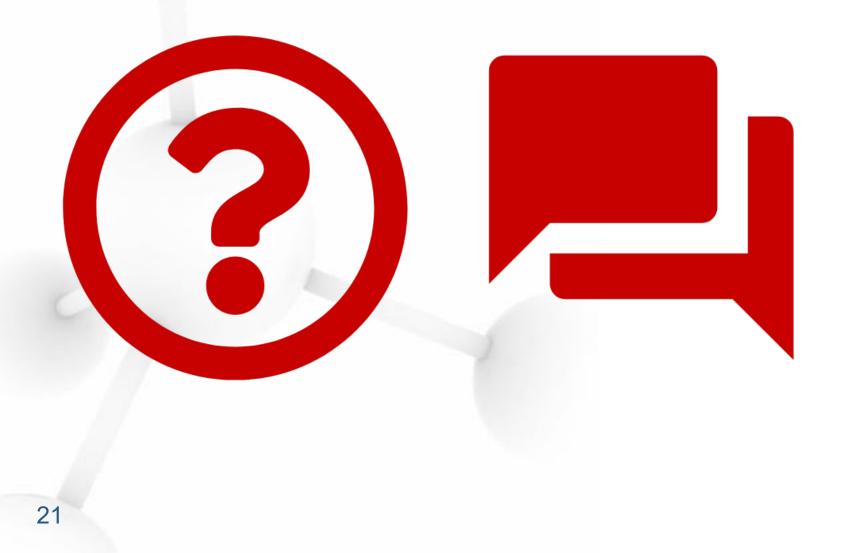




- Uniform Guidance 200.344 Reporting and Closeout <u>https://ecfr.io/Title-2/Section-200.344</u>
- OBFS Section 16 Project Closing Procedures
   <u>https://www.obfs.uillinois.edu/cms/One.aspx?portalId=77176&page</u>
   <u>Id=92534#07</u>
- UIC Sponsored Project Closeout <u>https://research.uic.edu/sponsoredprograms/closeout-award/</u>
- UIC Sponsored Project Closeout Checklist <u>https://www.obfs.uillinois.edu/common/pages/DisplayFile.aspx?ite</u> <u>mId=96443</u>



# **Questions/Discussion**



# **Next Meeting**

### Wednesday, April 14 from 1-2pm

### Topic: TBD

