Closeout Policy

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BACKGROUND

When a sponsored project is scheduled to end, and no extensions are requested, the Office of Research and Sponsored Programs initiates the Closeout Procedure. This procedure ensures that all financial and programmatic sponsor requirements are completed.

The Closeout Procedure specifically addresses the following:

- Early identification of potential problems.
- Confirmation that all project expenses are entered into the Financial Management System (FMS).
- Confirmation that the final invoice and financial report reflect all expenses to the project.
- Confirmation that the final invoice and financial report are submitted to the sponsor by the due date.
- Completion of all sponsor requirements (technical, programmatic and financial).
- Reconciliation of cash receipts to the final expenses in FMS and to the amount reported on the final report (Cash Receipts = Expenses = Final Report).
- Identification of deficits and surpluses on projects.
- Inactivation of the project in FMS so that no additional activity may occur.

SCOPE

A. Principal Investigator Notification

1. Ninety days before the end date of a sponsored project, the Grants Administrator contacts the Principal Investigator (PI) to determine whether a no-cost time extension or supplemental funding will be requested.

2. If a no-cost time extension is requested, the Grants Administrator facilitates this process and updates the project folder with the new end date.

B. Award Closeout

1. Most sponsors require that the submission of final documents occur 90 days after the end date of the award. If reporting requirements are less than 90 days, the Closeout Procedure takes place in a shorter period of time.

2. For unusual financial report or invoicing requirements and/or deadlines, the Grants Administrator notifies the Fiscal Affairs Accountant.

3. All expenses must be posted to the project before the final invoice or financial report can be submitted to the sponsor.

4. The financial and programmatic reports must be submitted to the sponsor in accordance with the terms and conditions of the award.
C. Deficits and Surpluses

1. ORSP and FA follow a collaborative process to identify deficits and surpluses in the course of closing out projects, and provide financial information to PI’s in order to assist them to reconcile financial records.
2. When deficits occur, ORSP and FA determine the amount and source of the deficit and inform the PI and the College Dean or responsible administrator. The source of funding to cover the deficit can be either the central administration or the College.
3. When a surplus is identified, the University returns any residual funds to the funding agency, unless otherwise specified by the terms and conditions of the award.

ROLES AND RESPONSIBILITIES

The Principal Investigator is responsible for ensuring that the project does not incur a deficit which is defined as the total expenditures and outstanding commitments exceeding the total amount budgeted.

When there is a deficit accumulated at the end of a project as a result of system deficiencies or administrative error, ORSP will recommend that the deficit be covered centrally. When the deficit is caused by the PI, it is the responsibility of the College to cover the deficit; in this case, the deficit will be transferred to a College account within 120 days from the end date.

Office of Research and Sponsored Programs

- Grants Administrator (GA)
  - Coordinates the closeout of the award with the PI and Fiscal Affairs.
  - Provides initial notification to the PI 90 days before the scheduled end date of the award.
  - Follows up with notification 30 days prior to the end of the award.
  - Contacts the PI, or department administrator, to determine if there are any outstanding expenditures that have not been processed.
  - Ensures that expenditures are reasonable, allowable and allocable.
  - Provides guidance and assists the PI in resolving any outstanding items.
  - Works with the PI (or department administrator) to minimize last minute adjustments before the final report/invoice is due to the sponsor.
  - Processes the surplus or write-off paperwork.

- ORSP Post-Award Manager
  - Runs a closeout report.
  - Sorts the awards by GA responsible for the award.
  - Reviews the Accounts Receivable Aging report issued by Fiscal Affairs.
  - Approves write-off forms when the deficit to be covered is $1000 or less.

- ORSP Director
  - Approves write-off forms when the deficit to be covered is greater than $1000.
  - Decides when a deficit is to be covered by the College and forwards the write-off recommendation to Fiscal Affairs for approval and processing.
Academic Department or Responsible Unit

- **Principal Investigator (PI)**
  - Communicates with the GA regarding any expense related, management related, or budget related issues before the end date of an award.
  - Submits all documentation for expenditures to ORSP by the appropriate deadline.
  - Ensures that cost-shared resources have been allocated to the project.
  - Submits the necessary technical reports and meets any other technical or programmatic requirements of the award or agreement.

- **College or Department**
  - Assumes responsibility for budgetary over-expenditures on the part of the PI.
  - Assumes responsibility for disallowed costs incurred by the PI.

Fiscal Affairs

- **Fiscal Affairs Accountant (FAA)**
  - Prepares all invoices and financial reports, and submits them to the sponsor before their deadline.
  - Contacts the GA before submitting the final report/invoice to confirm that all transactions have posted in the Financial Management System (FMS).
  - Ensures that all cash is collected on the final invoice and that the financial report has been submitted.

- **Financial Reporting Officer**
  - De-activates the project in FMS.

Budget Office

- **Budget Analyst (BA)**
  - De-activates project salary accounts within the Human Resources Management System.