

Project Closeout Procedures

At the conclusion of a sponsored project, the terms of the award require, among others, written reports, including a final technical or progress report and a report of expenditures, which must be submitted to the sponsor within a specified period of time. These reports are viewed as the UPR's fundamental obligation to the sponsor, and are required whether the sponsor is a private organization or a public agency.

Federal awards are subject to the following requirements:

Technical

Unless otherwise indicated, final performance reports are due 90 calendar days after the expiration or termination of the award. When required, performance reports shall generally contain, for each award, brief information to address the following requirements:

- A comparison of actual accomplishments in relation to the goals and objectives established for the period, the findings of the investigator, or both.
- Whenever appropriate and when the output of programs or projects can be readily quantified, such quantitative data should be related to cost data for computation of unit costs.
- Reasons established goals were not met, if appropriate.
- Other pertinent information, including, when appropriate, analysis and explanation of cost overruns or high unit costs. The PI is responsible for preparing and submitting this report. A dated copy of the report or letter of transmittal should be sent to the Office of Sponsored Programs or its equivalent, serving as audit verification that the report was filed.

Financial Report

Most sponsors require a final accounting report to document how the funding was spent. Federal awards require a Federal Financial Report (FFR SF-425), (<http://search.usa.gov/forms>) which is prepared by the Finance, Accounting Office, or its equivalent and submitted to the federal awarding agency.

Intellectual Property (Inventions)

Many private sponsors and most federal funding agencies require some sort of reporting to indicate whether inventions have resulted from the sponsored project. While private sponsors collect this information in various ways, federal agencies require the grantee (University) to submit a Final Invention Report or Statement and Certification, whether an invention has resulted from work under the funded project or not. The Final Invention Report or Statement/Certification must list all inventions that were conceived of or first actually reduced to practice during the course of work under the funded project, between the original effective date of

support through the date of expiration or termination of the project, whether previously reported or not. If there were no inventions, the statement should simply indicate None. The report must be prepared and signed by the PI/PD.

Property

Sponsors establish their own, individual policies and requirements for any accounting and disposition of property acquired with their funds. Federal agencies always require universities to account for any real or personal property acquired with federal funds. A report is prepared using agency-specific forms, identifying the equipment purchased, acquisition cost, make, model number, serial number, university inventory number, and condition. If the terms of the award do not automatically give title to the university, a letter is sent to the agency requesting transfer of title to the university. Furthermore, the UPR's policy Board of Trustees Certification Number 062, 1994-95 establishes the terms and conditions for property management. Federal Closeout Procedures According to 2 CFR Part 215 (former Circular A-110), it is required that federally funded projects complete the following closeout steps:

- Each institution shall submit, within 90 calendar days after the date of completion of the award, all financial, performance, and other reports as required by the terms and conditions of the award. The Federal awarding agency may approve extensions when requested by the recipient.
- Unless the Federal awarding agency authorizes an extension, a recipient shall liquidate all obligations incurred under the award not later than 90 calendar days after the funding period or the date of completion as specified in the terms and conditions of the award or in agency implementing instructions.
- The federal awarding agency shall make prompt payments to the recipient for reimbursable costs under the award being closed out.
- The institution shall promptly refund any balances of unobligated cash that the Federal awarding agency has advanced or paid and that is not authorized to be retained by the recipient for use in other projects.
- When authorized by the terms and conditions of the award, the Federal awarding agency shall make a settlement for any upward or downward adjustments to the Federal share of costs after closeout reports are received.
- The institution shall account for any real and personal property acquired with Federal funds or received from the Federal Government in accordance with the A-110 Property Standards Sections .31 through .37, addressing Insurance Coverage; Real Property; Federally Owned and Exempt Property; Equipment; Supplies and Other Expendable Property; Intangible Property; and Property Trust Relationship.
- In the event a final audit has not been performed prior to the closeout of an award, the Federal awarding agency shall retain the right to recover an appropriate amount after fully considering the recommendations on disallowed costs resulting from the final audit.

Procedures for Equipment Disposition or Transfer

Unless otherwise stated in the award terms and conditions, the title to equipment acquired under a sponsored agreement belongs to the institution. The institution is obligated to track and account for all equipment acquired with federal funds. Applicable federal and UPR policies regarding equipment disposition or transfer must be followed (Board of Trustees Certification 062, 1994-95) upon termination of a PI/PD position at the University. Each campus/unit must establish internal procedures and forms to comply with this policy. Title for grant-purchased equipment goes to the institution, not the PI/PD. NSF –request agency approval as long as the first institution doesn't require it, as long as the PI continues to need the equipment at the new institution and the cost of transfer isn't excessive. NIH –Equipment can stay with the institution; however, can force the transfer of the title if it considers the equipment would be better used following the PI to the new institution.

Record Retention

2 CFR, Part 215 (former OMB Circular A-110) states that “Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as authorized by the Federal awarding agency.” The exceptions to this rule include:

- If any litigation, claim, or audit has started before the expiration of the three-year period, the records need to be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.
- Records for real property and equipment acquired with Federal funds need to be retained for three years after final disposition.
- When records are transferred to or maintained by the Federal awarding agency, the three-year retention requirement is not applicable.
- Different retention rules apply to the indirect cost proposal related records. Because the period of a grant may range from 1 to 10 or more years, the three-year rule needs to be considered together with the length of the grant. For example, the records of a grant starting in 2005 and ending in 2008 should be kept until 2011 or 2012 depending on the date of the final financial report submission.