

# **Wellesley College**

## **Closeout Policy and Procedures for Externally Funded Awards**

### **A. Closeout Policy**

It is the policy of Wellesley College to comply with the requirements of the Federal Office of Management and Budget Uniform Guidance (2 CFR 200) for the financial management of sponsored projects including the timely and accurate closeout for awards.

### **B. Closeout Procedures**

Wellesley College must ensure, prior to award closeout, that all applicable administrative actions and all required work of the sponsored award have been completed, including financial, progress, and other reports as required by the terms and conditions of the award. Responsibility for ensuring compliance with awards terms and conditions is shared between the Principal Investigator, Post-Award Services (PAS), the Office of Sponsored Research (OSR), the WCW Office of Grant and Contract Services (GCS), the Office of Corporate and Foundation Relations (CFR), and the Controller's Office.

Award closeout is the final phase of a project in which activities are finalized, funding ends and administrative tasks are completed. In general, sponsors require a basic set of reports in order to close an award and it is important to complete all the requirements in the timeframe stipulated by the sponsor. The closeout documentation and the timeframe for submission are stated in the terms and conditions of the award. Typically, the following reports are required within 90 days of the expiration of the award:

- Final technical/progress report
- Final financial report or final invoice
- Final inventions report
- Final disposition of equipment as required by award sponsor

### **Prior to Award End Date**

#### **180 days prior to the End date**

An End Date Notification email is generated and sent to the PI 180 days prior to a project end date. This email reminds PIs that the project is in its final 6 months and instructs them to review their progress on their sponsored award and to meet with their grants accountant (GA) to begin planning extension requests or closeout activities.

#### **90 days prior to End Date**

An End Date Notification email is generated and sent to the PI 90 days prior to a project end date. This email is a second reminder to PIs that the project is approaching expiration and instructs them to continue (or begin!) the necessary technical and administrative actions to close out the sponsored award. PIs should communicate with their grants accountant (GA) if a no-cost extension is needed, or to verify the status of award renewal or continuation.

Grants Accountants review project fund balances and rates of expenditure and work with PIs to address them. GAs process allowable cost transfer requests if necessary.

**Principal Investigators:**

- request a no-cost extension or renewal if appropriate and with assistance from PAS/OSR/GCS
- review FIN Grant Balance Report
  - review any outstanding invoices and follow up on purchases that have not arrived.
  - review open Purchase Orders and close them asap.
  - reconcile any travel advances, purchases, or expenses in Workday.
  - review project expenses for allowability, allocability, and reasonableness; submit appropriate cost transfer requests to PAS.
  - verify all payroll charges are correct; when necessary, ensure personnel are transferred off the award by the end of the project period.
  - resolve any deficits by working with PAS to transfer them to other appropriate sources
- ensure any subcontractor(s) have completed deliverables, submitted reports and will submit their final invoice within forty-five (45) days of the subcontract end date.
- verify all cost share commitments have been fulfilled, and are properly recorded.
- notify users (student/casual wage employees, department administrators) that the sponsored award is ending and the worktag should not be used after the award end date.
- prepare the Final Progress Report and any other required deliverables.

**After Award End Date**

**30 to 60 days after End Date**

- Grants Accountants draft Final Financial Report / Invoice and send to PI for review; verify payments of invoices, receipt, and payment of subcontract invoices, and verify closeout with the PI.
- PIs ensure all deliverables and reporting requirements have been met or will be submitted as required by the terms and conditions of the sponsored award.
- PIs update Controller's Office about the status and location of equipment.

**60 to 90 days after End Date**

- PI/OSR/GCS/PAS submits the Final Progress Report, Final Invention Statement and other required deliverables to the sponsor. PI sends a copy of the progress/technical reports to their Grants Accountant.
- Post-Award Services submits the Final Financial Report / Invoice to sponsor.
- Post-Award Services updates the Award Header in Workday to record submitted reports.
- Controller's office processes refunds/write-offs as required.

**After 90 days**

- Post-Award Services inactivates the Worktag within 120 days of grant end date.
- PI assists OSR/PAS and the Controller's Office with any audit inquiries.
- Award documents and financial records are retained in accordance with College and sponsor requirements.

## **C. Special Considerations**

### **Resolving Deficits: Cost Overruns**

Deficits (i.e., over-expenditures) occur when cumulative expenses exceed the amount awarded by the sponsor. With regular financial monitoring, deficits should be rare, and it is the PI's responsibility to resolve such deficits by transferring excess expenses out of the sponsored awards to other appropriate sources of funding within the closeout period. In resolving deficits, it is expected that excess expenses will be moved first to the PI's indirect cost recovery ("ID" fund) or research discretionary ("RD" fund) accounts. Other potential sources of coverage require approval and include start-up funds, internal travel funds, endowed chair funds, and the College general fund.

### **Charges Incurred after the Award End Date**

In accordance with sponsor imposed limits, it is acceptable to process payments for costs that were incurred prior to the end date of the project/award but posted to the project after the end date but within the closeout period (e.g., 90 days for Federal awards). Any charges posted after the closeout period will need to be explained and justified.

Examples of common "after the award end date" charges include:

- Payroll expenses
- Copy center charges
- Subaward/subcontract invoices

### **Disposition of Remaining Fund Balances and Handling of Fixed-Price Agreements:**

In the event of funds remaining at the expiration of a sponsored program, PAS will initiate a return of funds to the sponsor as required.

Fixed-priced agreements are a special case, and the terms of the agreement may allow the College to retain the unexpended (cash) balance at the project expiration. Any remaining balance will be transferred to the PI's research discretionary ("RD") fund (or other funds as appropriate).