

Closeout Processes

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Presenters

OSP:

- Jocelyn Wrisley Grant & Contract Coordinator / Office Coordinator
- Tammy Wildenstein Subaward Officer
- Corey Burger Manager of Operations

SFS:

• Janet Strait – Associate Director

RAIS:

• Christine Ashdown – RASS Functional Support Analyst

Deliverables are a Contractual Obligation

- Issues with non-compliance:
 - Federal sponsors can unilaterally close projects and report to congress
 - This can result in loss of future funding not just for the PI but Cornell as a whole
 - Less than timely submission reflects poorly on the investigators and Cornell
 - Sponsors can withhold payments
 - Projects don't get removed from Current and Pending reports until fully closed

Typical Deliverable Requirements

- Technical Reports (PI/Unit)
- Property Reports (SFS)
- Financial Reports (SFS)
- Intellectual Property / Patent Reporting (OSP working with Cornell's Center for Technology Licensing (CTL) office)

Is the project ready to close (PIs/Units)

- Begin to consider whether the project is ready to close 45–90 days before the end date.
 - If the project is not ready to close, work with your GCO to request extensions, supplemental funding, etc.

If the project is ready to close (PIs/Units)

- Ensure you are aware of and familiar with closeout requirements of the award
 - Are specific reports required
 - Are there specific forms that are to be used
 - Are there subrecipients on the project
 - If yes, what is needed from them
 - Who do you submit reports to
 - Do multiple people receive copies of the reports

OSP's Closeout Procedures

- GCAs review the RASS record:
 - Pull monthly reports to see what projects appear ready to close
 - Review the RASS record to verify that the project has expired or will expire in the near future
 - Review the "Amendment Request" panel for pending actions
 - Review the "Connected Records" panel to check for supplemental funding requests
 - If there are pending amendment requests or supplemental funding requests the project may not be ready to close at this time and deliverables may not be due
 - When ready to close; change the Stage to "Closeout" and the Status to "Award Awaiting Closeout"
 - Begin the closeout process
 - If all final deliverables are documented in RASS, the project can be closed at this time
 - Sometimes projects are closed in RASS, but you will receive a letter from the sponsor requesting additional information for closeout.
 - Please forward any of these letters/requests to <u>cu_awards@cornell.edu</u> and OSP will look into them

Subaward Closeout Processes

- Prime award cannot be closed until all subawards are closed.
- Departments are responsible for collecting reports from subrecipients.
 - After final report dates are entered into RASS, please inform the subaward team at cu_subawards@cornell.edu. Then the subaward can be closed.
 - Upload reports to RASS.
 - Subrecipient IP reports need to be incorporated into CU's IP reports. If report is not uploaded to RASS, departments will need to send a copy of the report to <u>cu_awards@cornell.edu</u>.
- FDP Template: Reports due 60 days after the subaward end date.
- Non-FDP, foreign subrecipients: Subaward team will negotiate due date 30 days after end date.
- Interim reports need to be gathered in addition to final reports.

OSP Closeout Procedures - NFAs

- Are there Non-Financial Agreements that are associated with the project
 - Notify OSP when usage is complete
 - (MTAs) Material disposition (return or destroy)
 - (DUAs) Certification of destruction or return
 - Data final disposition goes to Michael Bradley, or through CRADC

OSP Closeout Procedures – IP/Patent Reports

- PI and Unit need to work with CTL to make sure all disclosures are made
 - Reports are generally due within 90 days of the end date
 - Report to CTL as early as possible with appropriate detail
 - Include the sponsor award number and OSP# on disclosures
 - Provide sufficient detail to convey a clear understanding of the disclosure, including:
 - The nature, purpose, and operation of the invention
 - The physical, chemical, biological, or electrical characteristics of the invention
 - A technical description of the invention

OSP Closeout Processes – IP/Patent Reports

- OSP requests information from CTL usually 45-60 days after the end date of the project (earlier if required by the sponsor)
 - Information received from CTL is reported to the sponsor by:
 - Entering the data in online systems
 - Completing and submitting sponsor forms
 - Sending forms to SFS to submit as required
 - Filing negative patent reports when there are no inventions
 - If Cornell is a subrecipient, submit IP reports to the sponsor that directly funds Cornell's award

OSP Closeout Processes - Other

- OSP GCAs follow up with PI/Unit, SFS (Financial/Property) if submission dates are not documented in RASS. Tips and hints to make closeout more efficient:
 - OSP-GCOs must accurately document the required interim and final deliverables in RASS
 - When reports are submitted to the sponsor, be sure to enter the submission dates in RASS
 - Notify OSP if PI is transferring or retiring
 - If possible, provide a central mailbox for notifications
 - Make sure copies of the reports you submit go to everyone listed in the award documents
 - Chasing down the <u>submission dates of "Technical Reports"</u> is the most time-consuming part of the closeout process for OSP GCAs

- Check to make sure the project should close
 - Look for award amendment requests, supplemental funding, etc.
 - Reminder: all actions for modification will be processed through OSP
 - If no actions pending (i.e. presume close), review activity
 - PreAward, PostAward transactions
 - Generally indirect expenses
 - Fabrication activity not capitalized
 - Federal unallowable/questionable items
 - Budget restrictions (e.g. participant support)
 - Cost Share
 - Contact department for confirmation of review, closeout actions, questions on above
 - Reminder: Do not wait for that contact. Closeout starts up to 90 days prior to expiration
 - All general ledger activity is required to be completed 30 days prior to final report due
 - » Have a list of pending actions, if necessary, for reconciliation and communication with SFS contact

Cost Category:
Travel - Foreign
Travel - Domestic
Capital Equip & Fabrication in Progress
Fabrication
Federal Unallowable expense
Subcontracts
Participant Support Costs
Office Supplies
Bonus (Payroll)
Non-travel meals
Outstanding Receivable / Liabilities
Open Encumbrances
PreAward
Post Term
Near Term

Topic								
Federal Form 270 (Payment Management System)								
Cost Share								
Program Income								
Final Financial (or invoice if appropriate)								
Contractor's release								
Small Business / Minority/Women Business Owned Enterprise								
Property Report								

- Once confirmed, complete and submit final financial deliverables
 - Submission of final invoice/financial report
 - Closeout (release) forms [May take coordinated efforts]
 - Some sponsors (e.g. NYSDAM, NYSTAR) require all reports to be submitted with the final invoice.
 - Submit all reports to SFS, or attach in RASS, for submission to sponsor
 - Property reports may be due prior to other financial deliverables
 - Capital assets office may support reporting obligation for property
 - Reminder: capitalize fabrication activity when placed in service!

- An agency may reject final invoice due to outstanding technical report
 - Some applications do not allow submission at all
 - Sometimes we only find out with collection efforts (60-90+ days after submission)
- If applicable, we'll coordinate notification with department and GCO
 - Reminder: Outstanding deliverable impacts more than just one project!

- Balance accounts, inactivate award in KFS [Financially inactive]
 - This is independent of closeout status in RASS
- Once accounts are *balanced*, and final payment received, account is closed in KFS

					Cash Position		Account
		To Date	To Date		(Up to obligated	True Cash	Receivable
Acct And Name	To Date Expense Budget	Expense	Revenue	Budget Balance	budget)	Position	Balance
XXXXXXX - U of Vermont Solar Eclipse	14,810.76	14,810.76	14,810.76	-	-	-	-

- Project accounts not balanced will not close:
 - Accounts receivable balance (payment not received)

					1		
					Cash Position		Account
	To Date Expense	To Date	To Date		(Up to obligated	True Cash	Receivable
Acct And Name	Budget	Expense	Revenue	Budget Balance	budget)	Position	Balance
XXXXXXX - U of Vermont Solar Eclipse	14,810.76	14,810.76	14,810.76	-	-	-	9,610.01

- Project accounts not balanced individually, overall project is balanced

						Cash Position		
		To Date				(Up to		
		Expense	To Date			obligated	True Cash	Account
Ac	ct And Name	Budget	Expense	To Date Revenue	Budget Balance	budget)	Position	Receivable Balance
XXX	(XXXX - U of Ve	53,352.36	52,642.89	59,351.42	709.47	6,708.53	6,708.53	
XXX	XXXA - U of Ve	10,073.70	10,275.96	8,574.44	(202.26)	(1,499.26)	(1,701.52)	-
XXX	(XXXB - U of Ve	10,076.22	10,136.80	10,076.22	(60.58)	-	(60.58)	-
XXX	(XXXC - U of Ve	22,971.06	23,417.69	18,471.26	(446.63)	(4,499.80)	(4,946.4 2)	
	Totals	96,473.34	96,473.34	96,473.34	-	709.47	-	

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- SFS will balance project accounts at closeout, if needed
 - Budget adjustment
 - Project overrun entries
 - Salary transfer overrun is completed by unit
 - Revenue distribution
- Unit will clear/close open encumbrances

Proposal Closeouts

- Declined Proposals (Not-funded)
 - OSP closes these when they receive a notification from the sponsor
 - If you receive a notification forward it to <u>cu_proposals@cornell.edu</u>
- Ancient Proposals
 - Closed by OSP when the proposed start date is past 18 months

RASS Closeout Process Demonstration

- Don't ignore RASS notifications
 - Notify OSP if report dates are incorrect or need to be updated
- Demo of documenting deliverables and the closeout processes in RASS



Questions?

Future questions can be directed to:

OSP: <u>cu_awards@cornell.edu</u> SFS: <u>sfs-help@cornell.edu</u>

RASS: rass@research.cornell.edu

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