

Closeout Policy

Revised: April 2019

BACKGROUND

As a recipient of federal awards, CSU Dominguez Hills Foundation (CSUDHF) is required to meet compliance standards as outlined by external regulations, including the federal guidelines in OMB Uniform Guidance (2 CFR 200) and CSU ICSUAM 11003.11. When a sponsored project is scheduled to end, and no extensions are requested of the sponsor, the Office of Sponsored Research and 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 that may prevent a timely closeout process
- Confirmation that all project expenses are entered into the Foundation's financial system.
- Confirmation that the final invoice and financial report reflect all expenses posted to the project and are submitted to the sponsor by the due date
- Completion/fulfillment of all sponsor requirements (technical, programmatic and financial)
- Final invention statement, Conflict of Interest form, Cost Match Report if applicable
- Reconciliation of final expenses posted in the financial system to the amount submitted on the final financial report
- Identification of any deficits or surpluses on projects
- Inactivation of the project in financial system so that no additional financial activity may occur

PROCESS

A. Principal Investigator Notification

90 days prior to a sponsored project's scheduled end date, the Post Award Analyst shall contact the Principal Investigator (PI) to discuss outstanding project matters and to determine whether a no-cost time extension or supplemental funding will be requested.

- If a no-cost time extension is requested, the Post Award Analyst facilitates this process externally with the sponsor.

B. Award Closeout

Most sponsors require final documents be submitted within 90 days of an award's end date. If reporting requirements for an award occur on a timeline of less than 90 days, the Closeout Procedure shall take place over a shorter period of time as required to meet the sponsor's deadline.

- All expenses must be posted to the project before the final invoice or financial report can be submitted to the sponsor. In no instance shall an expenditure be processed after 60 days from the end date of the project.

- Aggregate supplies exceeding \$5K in total aggregate value upon termination, where said supplies cannot be used by another Federal award, must be retained for use on other activities or sold. In either case, the Federal government must be compensated.
- Financial and programmatic reports must be submitted to the sponsor in accordance with the terms and conditions of the award.

C. Deficits and Surpluses/Project Inactivation

ORSP shall work with the PI during the closeout process to identify deficits or surpluses and shall provide financial information in order to assist them in reconciling financial records.

- The PI 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 deficits occur, ORSP shall determine the amount and source of the deficit and inform the responsible administrator. ORSP shall work with the PI and/or other responsible administrator to identify the specific source of funding to cover the deficit.
- When there is a deficit accumulated at the end of a project as a result of system or administrative errors, the deficit will typically be covered centrally.
- If the deficit is the result of overspending, it is typically the responsibility of the College to cover the deficit; if the College will not be held responsible for the deficit, the PI must indicate an alternate source of funds to cover the deficit.

Surpluses

When a surplus is identified ORSP will return residual funds to the sponsor, unless otherwise specified by the terms and conditions of the award. If the surplus occurs on a Fixed Price Agreement, the maximum allowable balance transfer is 25% or less of the entire awarded amount. The balance will be transferred to the PI's IDC/discretionary account.

Project Inactivation

After a project's cash deficit or surplus has been resolved, and all other requirements have been met, the Post Award Accountant inactivates the project in the financial accounting system.

ROLES AND RESPONSIBILITIES

Post Award Analyst

- Coordinates the closeout of the award with the PI
- Provides initial notification to the PI 90 days before the award's scheduled end date and follows-up, as necessary, until all matters involving the award have been resolved
- Contacts the PI to determine if there are any outstanding expenditures that have not been processed and works with the PI to minimize last minute adjustments before the final report/invoice is due
- Ensure any subcontractor(s) on the award have completed all necessary deliverables, submitted all required reports and will submit their final invoice within 45 days of the end date
- Provides guidance and assists the PI in resolving any outstanding items
- Processes the surplus or write-off (deficit) paperwork

ORSP Director

- Approves write-off forms and surplus transfers.