

# CLARK ATLANTA UNIVERSITY

## Policy 7.7.6: Closing Sponsored Programs



CLARK ATLANTA UNIVERSITY		
<b>POLICY and PROCEDURE</b>	<b>Subject:</b> Closing Sponsored Awards	
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## **1.0 Policy Statement**

The University receives many grants and contracts for research and training, as well as, sub-awards and other agreements, which must be governed by the rules of the Office of Management and Budget (OMB) Circulars A-133 and A-110. This policy provides guidance for the University in closing all sponsored agreements and grants managed in the Banner Grants Modules.

## **2.0 Procedure Narrative**

Each sponsoring agency's award has varying requirements. Therefore, it is important to be aware of any special terms and conditions listed in the award notice that may supersede the provision of this policy or OMB Circulars.

### **2.1 Project Closeout Process**

In order to comply with federal regulations addressing project closeout (OMB A-21 and A-110), a project closeout process is established. Every award will specify a time span at the end of the award in which the financial and programmatic data are required to be submitted in the final report. This is referred to as the Reporting Period.

This process consists of the following steps:

- Grants and Contracts Accounting, in order to lay out the actions to be taken, will contact the principal investigator within 30-60 days prior to the end of the project.
- The principal investigator is responsible for initiating any requests for extensions by the funding agency via the Office of Sponsored Research and Programs. Prior to requesting the extension, an assessment of the budget status and the timeframe in which to complete the expenditures should be addressed with Grants and Contracts Accounting. This will help assure that all fiscal matters, including matching, are appropriately considered in the request for extension.
- Accounts will be frozen after the project termination date so that transactions after that time can only be charged to the account after review and approval of Grants and Contracts Accounting.
- The principal investigator will work with Grants and Contracts Accounting to ensure that all transactions are completed and charged to the accounts within the prescribed sponsor deadline. At most this could be a 90-day period following the end of the grant.
- All charges found to be unallowable must be moved to an unrestricted account.
- All feeder drawing on the closed project, including payroll, must be cancel before the end date of the award.
- Project Administrators provide all necessary reconciliation paperwork, receipts, and other documentation to Grants and Contracts Accounting/or sponsors upon request.

## **2.2 Closeout of a Subaward**

At the end of an award, Contracts and Grants Accounting will verify that all invoices have been received from all subrecipients before preparing a final financial report or final invoice for the prime agreement. The method and result of the verification will be documented, signed and dated. The documentation of the verification is reviewed and signed evidence of the Grants and Contract Accounting review. If the subaward was not fully spent, Grants and Contracts Accounting should contact appropriate project staff to have the purchase order reduced to zero and closed.

## **2.3 Records Retention**

Records, such as approvals and reviews, should be retained by the Grants and Contracts Accounting for the time period specified in the Office of the Controller's Records Retention Policy 7.1.5 and beginning after submission of all final reports to the sponsor, unless the award specifies a longer period. If the sponsored program is under audit, the Grants and Contracts Accounting Office and the Research and Sponsored Program Office are consulted before destruction of records. Effort Certification Reports are retained by the Grants and Contract Accounting Office. Electronic scanned images may be acceptable forms of original documentation for retention. However, acceptance of the practice must be obtained from the Vice President for Finance and Business Services before destroying any original documents.

## **3.0 Entities Affected By This Policy**

Grants and Contracts Accounting Office

## **4.0 Definitions**

**Reporting Period** - Span of time from the final day of availability for award funds until the due date for final financial and technical reports.

**Project Administrators** - Each project has an administrative office established to manage administrative duties and monitor compliance for externally sponsored program activity.

**Subaward** - Also known as a subcontract, is a formal written agreement made between the University and a sub-recipient to perform a portion of the work under a sponsored agreement.