



## **Boston College: OFFICE FOR SPONSORED PROGRAMS Closeout Policy and Procedures**

### **Background**

The Boston College Office for Sponsored Programs (OSP) provides administration and support for sponsored programs. Sponsored programs, or the term sponsored awards, may be used in this document interchangeably and mean any agreement, contract, project, or grant that is funded by a source other than Boston College. Activities related to sponsored programs must comply with the sponsor's terms and conditions, Boston College's policies and procedures, and Federal regulations including those from the Office of Management and Budget (OMB) such as OMB's 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance").

### **Purpose**

The purpose of this policy is to provide guidelines to facilitate the timely and accurate closeout of a sponsored project in accordance with Federal and non-Federal requirements.

### **Scope**

This policy is applicable to all sponsored projects and must be followed by schools, departments, centers, institutes, and personnel of Boston College involved with sponsored projects.

### **Effective Date**

The effective date of this policy was April 2015. It was revised May 2018, March and Oct. 2019.

### **Closeout Policy**

Boston College must ensure, prior to sponsored award closeout, that all applicable administrative actions and all required work of the sponsored award have been completed, including financial reports, performance reports, and other reports, and deliverables as required by the terms and conditions of the sponsored award. Responsibility for ensuring compliance with sponsored awards' terms and conditions is shared between the Office for Sponsored Programs (OSP) and the Principal Investigator (PI).

## **Closeout Procedures**

Award closeout is the final phase of a project in which activities are finalized, funding stream 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 sponsored award. The general terms of an award require that the following reports be submitted within 90 days of expiration of the award, if Federal and 60 days, if non-Federal:

- Final technical report
- Final financial report or final invoice
- Final inventions report
- Final disposition of equipment as required by award sponsor
- Assignment and releases for contracts and subcontracts

To comply with sponsor closeout deadlines, OSP, the Principal Investigator (PI) and the Department Research Administrator (DRA) are required to submit deliverables and financial information for the project.

## **Refunds and Residual Balance Procedures**

When award closeout procedures are being performed, it may be determined by DRA and/or OSP that remaining funds will not be spent (under-expenditure) as the project has been completed. If Boston College is not entitled to retain funds in accordance with sponsor policy and OSP's Residual Balance Procedures, funds received in excess of expenditures/costs incurred per the terms of the award will be refunded to the sponsor.

If there are funds remaining and there is a demonstrated need to continue the project, then the PI and DRA should notify OSP. It may be possible to request a no-cost extension from the sponsor to allow for the continuance of the project. OSP will reach out to the sponsor and make the no-cost extension request.

When a no-cost extension is not an option and there are funds remaining, OSP will review the terms of the award to determine the sponsor's policy on the disposition of the remaining funds. If the terms specify that the remaining funds must be returned to the sponsor then OSP will process a refund. OSP will inform the PI and/or DRA when OSP initiates the refund to return the remaining funds to the sponsor.

If the award terms do not specify disposition, and do not meet the requirements of the Residual Balance Procedures, then OSP will apply the following rules:

- Remaining funds that total greater than \$200.00 will be refunded by OSP to the sponsor.
- Remaining funds that total \$200.00 or less will be removed from the award by OSP and go to the write-off account.

## **Write-Offs**

As noted above in the Refund section of this policy, there may be circumstances when funds are removed from a sponsored award and go to the write-off account. Write-off decisions are made on a case by case basis by OSP.

When award closeout procedures are being performed, it may be determined by OSP that funds have been overspent (over-expenditure). OSP will discuss the situation with the PI and/or DRA. OSP may determine the over-expenditures should be removed from the sponsored award and charged to a non-sponsored account. Once the award is at a zero balance, then OSP can continue the award closeout process.

## **Timeline Guidance**

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

An End Date Notification email is generated in PeopleSoft and sent to the PI and DRA 90 days prior to a project end date. This email reminds PI's and OSP that the project is approaching expiration and instructs them to begin the necessary technical and administrative actions to closeout the sponsored award (or consider requesting a No Cost Extension, if appropriate). PI should communicate with OSP Pre-Award if a no cost extension is being considered, or to verify the status of award renewal or continuation.

OSP Post-Award reviews project fund balances and rates of expenditure and works with PI and DRA to address them. Process allowable cost transfer requests.

PI reviews, with the assistance of the DRA as needed, outstanding purchase orders (POs), outgoing subcontracts, and purchases, submits appropriate journal entries and data changes to remove personnel and expenses from the project.

In addition, PI's and DRA's should:

- Communicate with OSP Pre-Award: discuss 1) the status of the award's renewal or continuation, or 2) the request of a No Cost Extension, if appropriate.
- Review any outstanding invoices and follow up on purchases that have not arrived.

- Ensure all project costs are incurred by the project end date. Review project expenses for allowability, allocability, and reasonableness; see also OSP's Allowable and Unallowable Costs Policy.
- Ensure any subcontractor(s) on the award have completed all necessary deliverables, submitted all required reports and will submit their final invoice within forty-five (45) calendar days of the subcontract end date.
- Verify all payroll charges are correct. Review all salaries and associated fringe to ensure they have been expensed correctly. Ensure personnel are transferred off the award by the end of the project period.
- Process cost transfers and labor distributions if necessary; see OSP's Cost Transfer Policy.
- Verify all cost share commitments have been fulfilled, and are properly recorded, if applicable; see Cost Sharing Policy.
- Ensure any adjusting journal entries have been posted, including the elimination of deficits indicated in the Grants Balance Summary report; see OSP's Cost Transfer Policy.
- Reconcile any travel advances charged to the award.
- Notify users (student employees, recharge centers, postage, etc.) that the sponsored award is ending and the chart string should not be used after the award end date.
- Cancel and destroy any Procurement Cards (P-Cards) for the award. Reconcile all monthly P-Card statements according to BC Policies and Procedures.
- PI prepares the Final Progress Report and any other required deliverables.
- Work with OSP to confirm the disposition of any equipment.
- Complete and sign the Closeout Checklist attesting to its completion, also ensure the above listed bullet points are completed.

## **After Award End Date**

### **0 to 60 days after End Date**

OSP Post Award verifies that PeopleSoft placed project into "Accounting Only" status (award is coded by OSP as "A" in PeopleSoft). Drafts Final Financial Report / Invoice and sends to Department and PI for review, if appropriate. Initiates OSP closeout checklist and works with OSP Pre-Award to ensure steps on the OSP internal closeout checklist will be completed.

### PI's and DRA's should:

- Ensure all deliverables have been submitted, or will be submitted as required by the terms and conditions of the sponsored award.
- All technical reporting requirements have been met and submitted to sponsor.
- Update OSP and Capital Asset Administration (Controller's Office) about the status and location of equipment, see also Boston College's Capital Equipment Policy.
- PI/DRA should complete Department Closeout Checklist and submit to OSP.

### **61 to 90 days after End Date**

PI/DRA submits the Final Progress Report, Final Invention Statement and other required deliverables to the sponsor per terms and conditions of the agreement. The signed Department Closeout Checklist should be sent to OSP for inclusion in the file.

OSP Post Award prepares and completes final closeout documents as required by sponsor.

### **After 90 days**

OSP Pre Award confirms receipt of subcontractor's fully executed amendment, and if necessary, the appropriate Assignment and Release Forms.

OSP Post Award confirms the project status will change to "Reporting Only" at 100 days after the project end date. Prepares and completes final closeout documents as required by sponsor.

### **After 6 months**

OSP Post Award reviews project to ensure no extraneous charges or sponsor requests have occurred in the 180 days since the award was placed in "Reporting only" status. If there has been no activity OSP Post Award will change the project in PeopleSoft to the "Closed Status" (award is coded as "K" in PeopleSoft).

### **After 3 – 6 Years**

The award will remain in "K" status until the record retention policy requirements specific to the award have been met. After which, the status in PeopleSoft will be changed to Shred "S". The physical and electronic files for the award are then shredded and deleted respectively.

### **Project Status in PeopleSoft:**

Active (O) – A sponsored project in "Active" status means that all costs, provided they are allowable, allocable, and reasonable, are permitted, and the research is in progress.

Accounting Only (A) – A sponsored project in "Accounting Only" status means that the project is only open for accounting purposes. Accounting Only status allows only for

financial reconciliation of the award. This status typically begins the month after the project's end date.

Reporting Only (R ) – A sponsored project in “Reporting Only” status means that the project is only open for reporting purposes, and no costs may be charged to the project. This status typically begins 100 days after the project's end date.

Closed (K) – A sponsored project in closed status means that the project has been closed; no further activity on the project.

Shred (S) – A sponsored project in “Shred” status indicates that the physical files have been shredded and electronic files deleted.

## **Definitions**

*See OSP's Definitions and Glossary of Terms, as well as OMB's Uniform Guidance.*

## **Contacts**

If you have any questions about this policy, how to treat a specific cost, or need additional information, please contact the Office for Sponsored Programs main number at 617-552-3344 or directly contact your area's OSP Liaison (OSP Staff).