



Award Management and Closeout

Policy Statement

The university has a responsibility to manage the sponsored projects lifecycle, to comply with policies, and to close out the completed sponsored projects in a timely and accurate manner.

Reason for Policy

The policy provides requirements that are intended to facilitate the timely and accurate processing and recording of financial transactions and the management and closeout of sponsored projects.

Who is Governed by this Policy

Faculty and staff

Policy

While the university is responsible for the stewardship of an award, the Principal Investigator (PI) is accountable to the sponsor, the university, the school, and the department in which the project is conducted. In addition to bearing the responsibility for conducting the project in a manner that is consistent with professional standards and in compliance with any federal, state, and local government laws and regulations, PIs also must be aware of and observe all of the terms and conditions of the award and university policies throughout the life cycle of the project.

The award closeout process is the culmination of the sponsored project life cycle and ultimately results in the completion of required deliverables/reports, the final billing, the collection of the outstanding accounts receivable, the submission of the final financial report, and the disposition of residual funds. The university has established a timeline that allows for a timely progression through the sponsored project life cycle. Final financial reports and/or invoices are submitted by the PI and/or the Grants Accountant or Office of Research and Sponsored Programs by the specified due date by the awarding agency to protect against the university not meeting deadlines.

Procedures for award closeout are specified in federal regulation, agency policies and procedures, and the terms and conditions of the award. Detailed procedures for award closeouts for federal awards are found in 2 CFR § 200.16 and 200.343, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, and 2 CFR § 215 (OMB Circular A-110 for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations for funding effective before December 26, 2014; collectively referred to as Federal Guidance. These procedures describe the

responsibilities of federal funding recipients and are intended to provide the sponsor assurance that the awardee has complied with the terms and conditions set forth in the award, including the timely submission of all deliverables.

PI Roles and Responsibilities during Award Management:

- The relevant department chair and dean are responsible for overseeing PIs under their purview, but ultimate responsibility for management of the award (including items listed below) remains with the individual PI.
- The PI supervises the technical performance of the project, oversees compliance with award terms and university policies, manages the project expenditures by reviewing reports monthly, and completes the deliverables. The PI is responsible for properly treating confidential materials, completing the final patent report and royalty reports, if any, completing the plant and property clearance report, and confirming instructions for disposal of all property in accordance with the terms and conditions of the award.
- The Grants Accountant and the Office of Research and Sponsored Programs is responsible for initiating transactions in support of the PI accurately and timely and in line with federal, state, local, sponsor and university policies.
- The PI and/or department/school are responsible for any adverse financial consequences (i.e., unallowable costs, overages, sponsor default on payment, etc.).

Closeout Process Timeline, Roles and Responsibilities

The closeout timeline begins 90 days prior to the award end date and culminates with the submission and/or acceptance of the final financial and technical reports. The university has assigned responsibility for management of the financial aspects of sponsored projects to the PI, the department chair, the dean or the dean's official designee, the Grants Accountant and Office of Research and Sponsored Programs.

- The PI is responsible for indicating that expenditures are accurate and are allowable, allocable, and reasonable in a timely fashion prior to the close of the award. For fixed amount awards, the PI will be asked to certify that deliverables were met and level of effort was expended as outlined in the award document.
- The PI and/or department/school are responsible for any adverse financial consequences (i.e., unallowable costs, overages, sponsor default on payment, etc.). Expenditures charged to a department account during the financial closing process are not eligible for cost transfers.

Carryover/Carry-Forward Requests

For awards subject to prior approval (link to prior approval) requirements, recipients must request to carryover / carry-forward unobligated funds from one budget period to the next. When submitting a carryover request, keep the following in mind:

- The unobligated balance for the applicable budget year must be determined by the recipient's finance office and confirmed with GA before a carryover request is submitted.
- Carryover requests must be submitted at least 120 days before the end of the program year in which the funds are being requested.
- Approved carryover funds must be obligated in the year in which they are awarded.

- Carryover funds are intended to cover only prospective costs, not costs already incurred by the recipient.
- Carryover funds are to support one-time activities that align with the grantee’s existing goals and objectives. Approval for one-time activities does not constitute automatic approval for funding these activities in the future.

Please reference the award terms and conditions to determine if carryover of funding from one year to the next requires prior approval by the sponsor. For NIH awards, this stipulation is referenced in section III of the award notice stating: “Carryover of an unobligated balance into the next budget period requires Grants Management Officer prior approval.” For other sponsors, the information can be found in their respective policy guidance documents. Please reach out to your ORSP Grant Specialist with any questions.

Definitions

This policy does not have definitions associated with it at this time. Upon periodic policy review this area will be evaluated to determine if additional information is needed to supplement the policy.

Procedures

This policy does not have procedures associated with it at this time. Upon periodic policy review this area will be evaluated to determine if additional information is needed to supplement the policy.

Forms

This policy does not have forms associated with it at this time. Upon periodic policy review this area will be evaluated to determine if additional information is needed to supplement the policy.

Related Information

This policy does not have related information associated with it at this time. Upon periodic policy review this area will be evaluated to determine if additional information is needed to supplement the policy.

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Who Approved This Policy

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Tags

Research, Faculty, Staff