**PURPOSE**

This policy provides guidelines for sponsored project closeout procedures to ensure compliance with [the Office of Management and Budget (OMB) Code of Federal Regulations Part 200 – Uniform Administrative Requirement, Cost Principles, and Audit Requirements for Federal Awards](http://www.ecfr.gov/cgi-bin/text-idx?SID=6214841a79953f26c5c230d72d6b70a1&tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) (“Uniform Guidance”), federal and state regulations, and sponsor and award terms and conditions.

Failure to adhere to the provisions of this policy may result in the University’s sponsors, or other government agencies, disallowing costs or imposing other sanctions.

**SCOPE**

This policy should be known and understood by the following groups of individuals responsible for the specific roles outlined below:

* **Department Chairs/Directors:**
  + Approve the final [Grant Reconciliation Worksheet](https://www.creighton.edu/fileadmin/user/AdminFinance/Controller/docs/Forms/_REC_Template.xlsx), if applicable.
* **Department Administrators:**
  + Assist the PI in receiving all goods and invoices on a timely basis.
  + Review and approve the final [Grant Reconciliation Worksheet](https://www.creighton.edu/fileadmin/user/AdminFinance/Controller/docs/Forms/_REC_Template.xlsx).
* **Principal Investigators:**
  + Responsible for timely technical reports and deliverables
  + Review and approval of the final [Grant Reconciliation Worksheet](https://www.creighton.edu/fileadmin/user/AdminFinance/Controller/docs/Forms/_REC_Template.xlsx).
* **Accounting Services:**
  + Initiate the closing process,
  + Provide the final [Grant Reconciliation Worksheet](https://www.creighton.edu/fileadmin/user/AdminFinance/Controller/docs/Forms/_REC_Template.xlsx),
  + Submit the final financial report to the sponsoring agency
  + Prepare billing to sponsor
  + Draw funds from sponsor
* **Sponsored Programs Administration:**
  + Collect all financial and non-financial reports and assist the PI with submission, if applicable.
* **Internal Audit Personnel, Associate Vice Provost for Research and Scholarship, Provost/Vice Presidents/Vice Provosts, Deans, Department Charis, Directors or any other personnel who are involved with or have oversight of activities or spending of resources for sponsored projects:**
  + Apply these policies in their duties over sponsored projects

**POLICY**

Creighton University is required by the Uniform Guidance to liquidate all obligations incurred and to close out all sponsored projects in Creighton’s financial and other systems within 90 calendar days after the end date of the grant. (See also the Accounting Services Procedure [GAPR03](http://www.creighton.edu/fileadmin/user/AdminFinance/Controller/docs/Procedures/old/gapr03.htm), “Grant Closing.”) This means the sponsored project is financially balanced and expenditures (e.g. vendor payments, payroll, or other non-labor costs) can no longer be incurred against the project. Creighton University also must submit all financial, performance, and other reports to granting agencies within 90 calendar days after the completion of the project, or in accordance with the terms and conditions of the award.

**Accounting Reconciliation and Financial Reporting Requirements**

Accounting Services is responsible for initiating the sponsored project closing process within 30 days prior to the end date of the project. If a project is ready to close early, the Principal Investigator (PI) shall notify Accounting Services in writing (via email) and Accounting Services will initiate the process early.

All goods must be received before the end date of the project. Reasonable effort must be made to ensure all invoices post to the project accounts within 45 days after the end date of the sponsored project, or in accordance with the timeline of the final financial report, whichever comes first.

Accounting Services will prepare a [Grant Reconciliation Worksheet](https://www.creighton.edu/fileadmin/user/AdminFinance/Controller/docs/Forms/_REC_Template.xlsx) for all sponsored projects on an annual basis. The final Grant Reconciliation Worksheet will be provided to the department administrator and PI, detailing how monies have been spent on the sponsored project through the end date. The department administrator and PI have 7 calendar days (dependent upon the timeline of the final financial report) to review and approve the final reconciliation, notify Accounting Services of any and all unposted expenditures, and advise Accounting Services which fund and organization codes should absorb any over-expenditures or unexpended balances. If the PI’s approval is not received within that timeframe, the department administrator’s approval is still required and accepted as sufficient approval.

To keep an unexpended balance, Creighton must have permission, in writing, from the sponsoring agency (terms and conditions in the original agreement, including firm fixed price agreements, will suffice as written approval). When transferring the unexpended balance to a designated department fund and organization code, Accounting Services will deduct Facilities and Administrative costs at the appropriate rate, if applicable, from the unexpended balance amount.

The responsible Department shall cover all over expenditures incurred for the purpose of the award that are not allowed to remain on the grant, due to lack of remaining funds or if the transaction date falls after the end date of the grant.

Following the approval of the final Grant Reconciliation Worksheet, Accounting Services shall submit the final Financial Report to the sponsoring agency, incorporating only those allowable expenditures, and in coordination with the PI, if applicable. Many sponsoring agencies require a final financial report, usually within 60 to 90 days of the end date of the sponsored project. Occasionally the time can be extended to 120 days. Only under extenuating circumstances would Accounting Services request an extension of the final due date or a revision of the final financial report.

**Other Reporting Requirements**

The PI is responsible for the preparation of the final technical or performance reports per sponsor guidelines. The PI shall coordinate submission of the final technical report with Sponsored Programs Administration, per sponsor or award requirements. If other reports (e.g., an invention disclosure or property report) are required, the PI shall work with Sponsored Programs Administration and Accounting Services to complete and submit.

If Creighton is unable to collect any monies due from the granting agency due to a delinquent or outstanding technical or other report under the PI’s purview, Accounting Services will write off uncollectable balances to the responsible department.

**Late Award Closeout**

There are several risk factors associated with late award closeout. Sponsors may withhold carryover funds, incremental funding, or final payments until they receive outstanding reports and/or invoices. This could jeopardize future funding for the entire University.

**Records Retention**

The Creighton University Research Records Retention Policy provides instruction on how long to keep all records related to research, including research conducted under grants and contracts. Principal Investigators shall follow this policy to ensure the credibility and soundness of records maintenance procedures in the event of an audit or litigation.

**Equipment**

The Creighton University Capitalization of Assets policy provides instruction on what to do with grant-funded equipment once the grant ends. Principal Investigators shall follow this policy to ensure the proper steps are taken to keep or relinquish ownership of the equipment.

**DEFINITIONS**

N/A

**REFERENCES**

* [Grant Reconciliation Worksheet](https://www.creighton.edu/finance/sharedservices/generalaccounting/forms/)

**ADMINISTRATION AND INTERPRETATIONS**

For questions about this policy contact Accounting Services

**AMENDMENTS OR TERMINATION OF POLICY**

The University reserves the right to modify, amend, or terminate this policy at any time.