

Award Closeouts - Frequently Asked Questions

**Question:** Why do we have to submit final reports and close awards during the 90 days after the end date?

**Answer**: The Uniform Guidance requires that all federal final reports be issued within 90 days from the award end date. For awards with letter of credit (LOC) drawdowns, all cash draws must be made prior to the 90-day period and reconciled to the amounts reflected on the final financial report. For non-LOC awards, a final invoice/report must be submitted within the 90 days to request final amounts and to report the final expenditures.

**Question**: What is the best practice for grants managers and PIs to comply with the policy for closing awards within the 90 days following the end-date?

**Answer:** Monthly reviews and validations of costs throughout the life of the award facilitate the timely closeout within the required timeframe. The PI is responsible for ensuring that all costs charged to the grant are reasonable and allowable with the assistance of the departmental grants manager/administrative staff. The PI should request timely corrections for any cost deemed unallowable/inappropriate for an award including those created by posting errors.

**Question**: An error was discovered after the final financial report was submitted to the sponsor and the award has been closed in Oracle. Can we correct this error?

**Answer:** Yes. If the sponsor was overcharged due to the error, then the award should be reopened to process the appropriate credit and refund the sponsor according to sponsor-specific guidelines. If the sponsor was under-charged (i.e. receive a late revised subcontractor invoice), then the sponsor-specific guidelines must be reviewed to see if allowed. If it is within the defined window of time and the sponsor allows for the correction and is willing to pay for the costs, a revised final financial report will be submitted for payment. This will be handled on a case-by-case basis in coordination with Research Finance personnel.

**Question**: What is the difference between closing a cost reimbursable award versus a fixed price award?

**Answer: Cost Reimbursable** – Vanderbilt will bill for all allowable costs up to the total award amount. If there are any remaining dollars in the budget that were not spent, the award contract amount is reduced to equal the final spent amount. The unused balances are forgone and cannot be transferred to another source.

**Fixed Price** – If all funding has been received and applicable expenses recorded to the award and there is a surplus at the time of closeout, the available funds can be transferred to the PI's faculty fund. If the remaining balance is greater than 10% of the total award, the transfer of the remaining balance must be approved by the appropriate authorities for that area.

Question: Do all awards have to be closed out even if no report is due to the sponsor?

**Answer:** Yes. A closeout review is required for all sponsored awards. Even if no sponsor report is required, the department needs to follow the same steps as prescribed by the policy and procedures and communicate with Research Finance as to the final award amount so the award can be closed.

## **Related Documents**

Uniform Guidance - https://www.ecfr.gov

NIH Grants Policy Statement – <u>https://grants.nih.gov/policy/index.htm</u>

NSF Requirements - https://www.nsf.gov/bfa/dias/policy/