2021 Financial Assistance Workshop
Closeouts

Acquisition and Grants Office
Grants Management Division

April 2021
2 CFR 200 Revision: 120 Day Closeout Period

2 CFR 200.344 Closeout

- Recipients closeout period extended from 90 to 120 days
- Subrecipients must still submit final reports to the prime recipient within 90 days

Extension to closeout

- Request must be submitted as an award action request through Grants Online before expiration of initial 120-day close out period and include a justification for the delay
- Request is subject to the approval of the Grants Officer
GONE ACT

Closeout Oversight Requirements:

1) Grants Oversight and New Efficiency (GONE) Act
   - Signed into law January 28, 2016
   - Holds Federal awarding agencies accountable for closing awards within 1 year

2) 2 CFR Part 200 Revisions
   - If the non-Federal entity does not submit all reports the Federal awarding agency must proceed to closeout with the information available within one year of the period of performance end date.
   - If the non-Federal entity does not submit all reports within one year of the period of performance end date, the Federal awarding agency must report the non-Federal entity’s material failure to comply with the terms and conditions of the award in FAPIIS.
Who is Responsible for Award Closeout

- Non-Federal Entity
- Program Office
- Grants Office
Non-Federal Entity Responsibilities

- Complete award goals and objectives
- Verify all specific award conditions (SACs) have been satisfied
- Submit final payment request, *as applicable*
- Submit final Federal Financial Report (SF-425) and final Performance Progress Report
- Submit Report of acquired property (purchased with federal funds), *as required*
  - SF-428 – Tangible Personal Property Forms (equipment and supplies)
  - SF-429 – Real Property
- Advance/excess payments returned
Program Office Responsibilities

- Monitor and oversee award performance
- Review and accept performance or technical reports
- Notify Grants Office if non-Federal entity is noncompliant with award terms and conditions
- Verify that all programmatic specific award conditions are satisfied
Grants Office Responsibilities

- Review and approve final Request for Advance or Reimbursement (SF-270)
- Manage property acquired with Grant funds
- Ensure that the most current Single Audit is provided upon Closeout
- Verify all specific award conditions (SACs) are satisfied
- De-obligate remaining funds
- Complete the review of administrative and manual closeout documentation
Grants Online (GOL) Processing

• Phase I: Financial Closeout
  De-obligation

• Phase II: Administrative Closeout
  Administrative Closeout Checklist
Financial Closeout

Contingent on acceptance of final Federal Financial Report (SF-425)

The Final SF-425:

- Line 10a *Cash receipts* should be equal to line 10b *cash disbursements*, with no excess funds on hand, line 10c

- Line 10f, *Federal Share of Unliquidated Obligations* should be $0

- Funds to be deobligated on line 10h, *unobligated balance of federal funds*

- Indirect Cost Rates (correct math, negotiated agreement on file for each period during award, appropriate rates and methods used)
## Final SF-425 Report

### Federal Financial Report

**Follow form instructions**

1. Federal Agency and Organizational Element to Which Report is Submitted
2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment)

### Recipient Organization

- **Name and complete address including Zip code:**
  - **Recipient Organization Name:**
  - **Street1:**
  - **Street2:**
  - **City:**
  - **State:**
  - **Country:** USA - UNITED STATES
  - **ZIP / Postal Code:**

4a. DUNS Number 4b. EIN 5. Recipient Account Number or Identifying Number (To report multiple grants, use FRR Attachment)

### Report Type

- **Quarterly**
- **Semi-Annual**
- **Annual**
- **Final**

### Basis of Accounting

- **Cash**
- **Accrual**

### Project/Grant Period

- **From**
- **To**

### Reporting Period End Date

### Transactions

<table>
<thead>
<tr>
<th>Cumulative</th>
<th>(Use lines a-c for single or multiple grant reporting)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Cash (To report multiple grants, also use FFR attachment):</td>
<td></td>
</tr>
<tr>
<td>a. Cash Receipts</td>
<td>$xx.xx</td>
</tr>
<tr>
<td>b. Cash Disbursements</td>
<td>$xx.xx</td>
</tr>
<tr>
<td>c. Cash on Hand (line a minus b)</td>
<td>$xx.xx</td>
</tr>
</tbody>
</table>

### Federal Expenditures and Unobligated Balances:

- **Total Federal funds authorized** | $xx.xx |
- **Federal share of expenditures** | $xx.xx |
- **Federal share of unobligated obligations** | $xx.xx |
- **Total Federal share (sum of lines e and f)** | $xx.xx |
- **Unobligated balance of Federal Funds (line d minus g)** | $xx.xx |

### Recipient Shares:

| i. Total recipient share required | $xx.xx |
| j. Recipient share of expenditures | $xx.xx |
| k. Remaining recipient share to be provided (line l minus j) | $xx.xx |

### Program Income:

| l. Total Federal program income earned | $xx.xx |
| m. Program Income expended in accordance with the deduction alternative | $xx.xx |
| n. Program Income expended in accordance with the addition alternative | $xx.xx |
| o. Unexpended program income (line i minus line m or line n) | $xx.xx |

### Indirect Expense

|---------|---------|----------------|---------|------------------|------------------|

### Remarks

12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:

13. Certification: By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements, and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812).

### Authorized Certification

Prefix: ___________  First Name: ___________  Middle Name: ___________  Last Name: ___________  Suffix: ___________

### Signature of Authorized Certifying Official

Title: ___________

### Email Address

**Date Report Submitted: **

14. Agency use only:

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Standard Form 425
**Equipment**: tangible personal property (including components of information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or is more than $5,000.
# Equipment Disposition

Required when acquired equipment no longer needed for original project/program or other activities

<table>
<thead>
<tr>
<th>Current per-unit fair market value &lt; $5,000</th>
<th>Current per-unit fair market value ≥ $5,000 with a useful life of 1+ years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equipment may be kept *, sold, or disposed of with no further obligation to Awarding Agency</td>
<td>Equipment may be kept* or sold with compensation to Awarding Agency (Awarding Agency’s share % of interest × current market value of equipment)</td>
</tr>
</tbody>
</table>

*for use on other Federally supported work/projects
Disposition Instructions
(DOC Specific)

- Disposition instructions must be requested from DOC, when equipment is no longer needed.

- If DOC does not provide the disposition instructions within 120 days, equipment with a value of $5,000 or more can be kept or sold by the non-federal entity.

- Title may be transferred to Federal Government or eligible third party IF Non-Federal entity entitled to compensation for percentage of fair market.

- DoC reserves right to transfer title to Federal Government or a third party.

- Disposal costs charged to award or paid to Non-Federal Entity by DoC.

- If instructed to ship equipment elsewhere, DoC to reimburse Non-Federal entity.
Per the Research Terms and Conditions, Department of Commerce (DOC) permits non-Federal entities with research awards to own equipment upon acquisition without conditions and without obligation at the termination of the project.

Research award recipients do not need to request disposition instructions or submit equipment forms, unless specific award conditions direct the recipient otherwise.
Real Property (2 CFR 200.311)

**Real Property:** Considered land, buildings, land/building improvements
- Title vests in the non-Federal entity
- Must be used for original intended purpose as long as needed
- Disposition: when no longer needed on the original project, disposition instructions must be requested from the Awarding Agency

- The non-Federal entity shall retain title after compensating the Awarding Agency
- If the non-Federal entity decides to sell the property, they must give the awarding agency the federal share percentage times the proceeds of the sale, less expenses associated with the sale.
- Transfer title to the Awarding Agency or third party
Federally-Owned and Exempt Property

Federally-owned Property:

- Title remains vested in Federal Government
- If DOC/NOAA no longer needs the property it shall be declared excess and reported to General Services Administration. Example: depreciating equipment such as an x-ray machine, boats, etc.

Exempt Property (acquired under Federal award):

- Title vested in Non-Federal Entity when deemed appropriate by DOC/NOAA per explicit terms and conditions or statutory authority. Example: equipment under Research Terms and Conditions
**Intangible Property**

**Intangible Property**: property having no physical existence, including but not limited to trademarks, copyrights, patents, debt instruments, lease agreements, and stock.

- Title vests in non-Federal entity
- DOC reserves royalty-free, nonexclusive and irrevocable right to reproduce, publish, or otherwise use the work for Federal purposes, and to authorize others to do so
Supplies: all tangible personal property other than those described as Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-Federal entity for financial statement purposes or $5,000, regardless of the length of its useful life.

- Unused supplies > $5,000 must be sold or retained for use on other awards
- May not be used to provide services or supplies for a fee less than that charged by private companies for equivalent services/supplies
Equipment & Property Forms

- **SF-428** – Cover Sheet
- **SF-428-A** – Annual Report
- **SF-428-B** – Final Report
- **SF-428-C** – Disposition Request
- **SF-428-S** – Supplement Sheet
- **SF-429** – Real Property Report
- All government-wide and agency specific grant forms can be found on grants.gov

- Link to PDF and instructions are included
Closeout Process

- Returning Excess Funds:
  - If it is determined that funds have been drawn in excess of funds that should be available for deobligation, recipient should provide a written explanation for the overdraw, and a check for the overdrawn amount, along with corresponding back-up documentation and award number, should be sent to the following Treasury addresses for processing:

  **Via United States Postal Service (USPS)**
  Department of Commerce - NOAA
  PO Box 979008
  St. Louis, MO 63197-9000

  **Via FedEx or UPS**
  Department of Commerce – NOAA
  Attn: GA Lockbox 979008
  1005 Convention Plaza
  Saint Louis, MO 63101

  Payments can also be made electronically **Via ACH or FedWire**. You can contact either of the following for further details on these payment methods:
  Rodrigo Rojas: Rodrigo.Rojas@noaa.gov or 301-444-2780
  Maria King: Maria.King@noaa.gov or 301-444-2181
NOAA Administrative Closeout

- Verify that advance/excess payments returned
- Verify that equipment followed disposition instructions
  - Property and Equipment/Supplies Disposition: SF-428, SF-428B and/or SF-429
- Government property accounted
- Verify that Specific Award Conditions satisfied
- Final performance certification/report received & accepted
- Cost-share/match requirements met in accordance with the award
- Indirect costs consistent with the award
- Suspended/disallowed costs resolved
- The most current Single Audit must be submitted in FAC upon closeout of an award
Common Delays to Closeouts

1. The non-Federal entity is suspended or has disallowed costs, and if a pending audit has not been resolved
2. Specific Award Conditions have not been satisfied
3. Delinquent reports
4. Delayed acceptance of amendments
5. Termination of an award has not been completed
6. Delay in returning excess funds
7. Single Audit report is not current
Notification from Grants Online - Closeout Finalized

The above referenced Financial Assistance Award supported by NOAA ended on 2019-05-23 18:12:08.0. All received reports have been reviewed, and accepted as final in the format presented and in accordance with 15 CFR Part 14, Sections 14.53 and 14.71. As this award is officially closed, the option to re-open is not available. Any remaining funds not used or drawn down during the award period will be deobligated. Your files should be kept intact for a period of three years from the date of the final Financial Status Report or, until a final audit resolution (if applicable) is reached.
Record Retention after Award Closeout

- All non-Federal entity records pertinent to a Federal award must be retained for a period of **three years** from the date of submission of the final expenditure report.

- If litigation, claim, or audit is started before the expiration of the 3-year period, records must be retained until all litigation, claims, or audit findings have been resolved and final action taken.

- Records for real property and equipment acquired with Federal funds must be retained for **3 years** after final disposition.

- When records transferred to or maintained by Federal awarding agency or pass-through entity, 3-year requirement is not applicable to the non-Federal entity.
Questions?

You may also submit questions to GMD.Services@noaa.gov

Please remember to complete your surveys, and contact your respective Grants Management Specialist with any additional questions.