

Help Our Principal Investigators Stay Compliant

Completing the Award Closeout Activities



A Guide for Elements and Principal Investigator Teams



The research project has completed active research activities in the Post Award phase and the project is entering the Closeout Phase.

Award Closeout is the process that NASA and HHPC use to determine all applicable administrative actions

and all required work of the Federal award have been completed by the award recipient.

- Follows expiration or termination of an award's period of performance (POP).
- Constitutes the fourth and final phase of the award lifecycle.
- Recipient submits all final reports and payment requests.
- NASA Grant Officers and HRP Technical Officer ensure all final reports and deliverables are complete and reconciled.



Closeout Notifications to Recipients

- Notifications sent from NSSC.
- States that the award has expired, and closeout activities must be completed within 120 days.
- Include monthly reminders during 120-day period and weekly reminders after 120-day period.
- This serves as a prompt for recipients to begin preparing for closeout.

120 days to complete Closeout after POP end.

The Big Three. There are three regulations and policies governing the Closeout Phase. These are used by NASA and the HRP Technical Officer to complete **Administrative Closeout** and **Program Closeout** steps.

- 2 CFR 200: Title 2 of the Code of Federal Regulations, Part 200.
- A-136: Office of Management and Budget (OMB) Circular A-136.
- GCAM: NASA's Grant and Cooperative Agreement Manual (GCAM).



Administrative Closeout

All financial, technical, and other reports required by the terms and conditions are documented and has obtained all required concurrences and/or approvals.

Performance Reports

- The Final Performance Report must be sent to the NSSC GO and HRP TO.
- Reports must be a comprehensive overview of the recipient's efforts to accomplish the award's goals and objectives during the POP as outlined in the "Additional Reporting Requirements".

Financial Reports

- A certified Financial Status Report/Final Federal Financial Report (FSR/FFR) must be submitted to the NSSC via email.
- Final FSR/FFRs tell NASA how much funding the recipient drew down, how much they expended, and, if applicable, how much they contributed to their cost share requirements.

New Technology Reports (NTR)

• Final NTRs must be submitted in NASA's <u>e-NTR system</u>, and negative final reports are required. NTRs provide a means to capture information about technical discoveries, improvement, innovations, and inventions so that NASA can disseminate it appropriately.

Inventory Reports - Equipment is properly dispositioned, as necessary.

- If the recipient purchased equipment with award funds and title to that equipment remains vested with NASA, then a final inventory report is required.
- Nonprofit organizations submit an inventory report in a format of the recipient's choosing. For-profit recipients submit their report in the NASA Electronic Submission System (NESS).
- Closeout any subawards that may have been issued.

Liquidate Financial Obligations - Amounts due to the award recipient are paid. Unexpended funds are returned to NASA.

• Must be complete within 120 days of POP expiration.

- Completed when recipient has made all payments to vendors or providers (subgrant recipient, rent, personnel compensation, acquired goods or services).
- No new obligations allowed during 120-day period. These are allowed only while the award's POP is still active.

Final Payment Requests

- After POP end, payments may be requested for expenses incurred while POP was active.
- Should be requested within 120-day closeout period whenever possible.
- Requests after 120-day closeout period require prior written approval from cognizant GO.
- Must be made through <u>Department of Health and Human Services'</u>
 (HHS) <u>Payment Management System</u> (PMS).
- NSSC reviews and approves/denies payment requests in PMS.

Returning Funds

- Recipients must return unspent funding to NASA once they have liquidated their obligations.
- Recipients are not authorized to keep or transfer unspent federal funds.
- Funds not returned may constitute a debt to the Federal Government and agencies may take action per collection standards.



Program Closeout

- Recipient Performance Validation Form is sent to the NSSC within 120 days after the POP End.
- The Recipient Performance Validation Form captures the Technical or Program Officer's validation of overall grant compliance during the period of performance of the Federally funded project.
 - ✓ All administrative and financial reports submitted.
 - ✓ All data submitted and accepted for archive.
 - ✓ Final peer-reviewed manuscripts accepted for publication.

(Continued in next column)

Data Delivery, Verification and Acceptance – Data is delivered to the NASA Archive according to terms specified in grant awards, Authority to Proceed (ATP), agreements or other procurement instruments, and described in detail in data submission agreements.

Research Closeout – Concurrence from Archivist, Funding Element and PI that data set is complete and final.

- Was the data, metadata submitted correctly to the Archivist as specified in the RDSA?
- Did the Element or Project Manager approve the data set as final before the NASA Repository assumes sole custodianship of the data and closeout?
- See the "RDSA Training Guide" or <u>LSDA RDSA Blank Book</u> for more details.

Acronyms

DMP Data Management Plan

DMIO Data Management Integration Office

GCAM Grant and Cooperative Agreement Manual

GO Grants Officer (NSSC)

HRP Human Research Program

LSDA Life Sciences Data Archive

NSSC NASA Shared Services Center

POP Period of Performance

RDSA Research Data Submission Agreement
TO Technical Officer (HRP Grants Office)



Non-Compliance and Escalations

- If award recipient doesn't comply with Closeout requirements after multiple attempts, NASA proceeds with a unilateral close out of the award with available information.
- NSSC initiates Unilateral Award Closeout (closeout without the cooperation of the recipient) if the recipient fails to submit their final reports within 270 days of their due date.
- The recipient is deemed noncompliant with award terms and conditions and reported in the public website SAM.gov.
- Recipients' noncompliance may affect their ability to obtain future awards.