Office of Sponsored Programs (OSP)
Closeout Forum

December 9, 2015
9:30 am - 11 am
Agenda

• Hurdles to closing projects on time and what VPF has been doing to help the DLC’s – pain points and solutions
• Best practices to ensure timely closeouts
• Description of the various types of federal reporting requirements
• Who is responsible for providing the information or submitting
Closeout Working Group Participants

- Rich Lay
- Tim Vacha
- Tracy Bourassa
- Jack Defandorf
- Sophea Chan Diaz
- Noelle Donahue
- Karen Dow
- Anastacia Feldman
- Heather Finney
- Cory Heaton

- Mike McCarthy
- Larry McMahon
- Sue Patterson
- Kristen Shikes
- Ben Snedeker
- Dale Twomey
- Katherine Ware
- Macall Zimmerman
Closeout Working Group Pain Points

- Delays in posting cost center charges
- Other late cost transfers, including interdepartmental charges and salary adjustments
- Coordinating fabricated equipment accounts
- Completing cost share requirements
- Open commitments
- Unsure if a renewal or extension is coming
- Chasing subaward closeout items
- Roles and responsibilities, who’s chasing final reports
Late Final Financial Report (FFR) Issues

- Approximately 360 FFR’s due annually
- 80% on-time rate
- 65 late FFR’s in FY15
- This doesn’t include “Revised” FFR’s
- As many as 20% of “on-time” reports need to be revised and resubmitted
- Causes extra work for DLC’s, VPF, and the Sponsor
- Risks include:
  - Not receiving the correct amount of funding
  - Sponsor shutting out MIT in the future
The non-federal entity must submit, no later than 90 calendar days after the end date of the period of performance, all financial, performance, and other reports as required by or the terms and conditions of the federal award.

**Action/Impact:**
- Heavy emphasis and pressure on the agencies to ensure *all reports* are received *no later* than 90 calendar days after the end date
- Consequences: MIT won’t be reimbursed for late posting charges
- MIT needs to ensure timely closeouts
Federal Agency Requirements

- DOD- 90 days for all reports
- NIH- 120 days for all reports
- DOE- 90 days for all reports
- NSF- 120 days for all reports

Bottom line: MIT’s deadline for all reports is 90 days after the end date of the award, though we may have some extra time for clean up for some sponsors. This includes closeouts of all sub awards under the award. When we are a sub, we only have 60 days to closeout the award.
Cost Sharing

- RACC has launched a C/S Improvement Project and a Resource Group of people from various units with the most C/S activity – both dollar amount and number of cost share commitments
- Also includes some assistant deans and central administration
- Looking for advice and feedback on planned improvements on systems and procedures
Journal Vouchers

- **Service providers:** An email was sent out recently to the research environment requesting monthly billings.
- **Internal MIT vendors:** We are looking at ways to flag vendors that are not billing in a timely manner.
- **JV etiquette:** Please notify owners of other WBS accounts that are included in your JV when completing your document.
DLC Best Practices

• Currently available on Sponsored Accounting website:  
  http://vpf.mit.edu/site/sponsored_accounting/policies_procedures/wbs_closeout_highlights

• The list is also included in the pre-closeout email that is automatically sent out for WBS accounts that have an end date within the next 90 days

• Highlights include:
  o Use FRC tool monthly
  o Close out remaining open PO’s
  o Remove unallowable costs
FFR Closeout Timeline

- Automated preaward closeout notice from VPF
- Closeout notice from VPF
- Second notice from VPF
- Final notice from VPF

- 90 days prior
- 60 days prior
- 30 days prior
- 30 days after
- 60 days after
- 90 days after

END DATE
Sponsored Project Closeouts

- Reporting for most federal awards is due to the sponsor within 90 calendar days of the project end date.
- Agencies can disallow any cash draws or invoices due to late reporting.
- Reporting includes: patent, technical, financial, equipment, and invoice payments.
  - If MIT project has subawards, subaward reporting is also required.
Patent Reporting

- 30 days before the patent report is due, OSP checks Intellectual Property database in the Technology Licensing Office (TLO) and confirms information with PI
  - PI should inform OSP of changes within 2 weeks
  - OSP files the final patent report with sponsors

Note: Each subaward must submit a patent report to MIT before MIT can submit the final patent report
  - OSP Subaward team is responsible for obtaining subaward patent reports
Technical Reporting

- Automated reminder emails are sent to PI 30 before deadline and 30 days past due
  - Report reminders are on the PI Dashboard – kcoeus.mit.edu

- See OSP’s website on Research Performance Progress Report (RPPR) and award notice for requirements

- PI should send copy of technical report to ospaward@mit.edu
  - Communicating with OSP award on final technical report submissions will stop the email reminders

Note: Each subaward must submit a tech report to MIT before MIT can submit the final tech report

- PI is responsible for obtaining technical reports from subawards, with DLC administrator assistance as needed
Reports visible in KC

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Subaward Closeouts

MIT Flows-Down Closeout requirements from the Prime Award:

- **Final Reports Required:**
  - Technical, Invention, Property, Release of Claims
  - As required by the Prime

- **Timetable:** Most reports are required within 60 days, so that MIT can meet its 90 day deadline for closing out the Prime

- **Quick Closeouts:** Enable MIT to close the Subaward even if the Subrecipient does not have final indirect cost rates negotiated.
  - Language being put into Subawards
Subaward Closeout Process

#1. Kuali Coeus Email Notice: “Subaward End Date in 30 Days”

As of December 1\textsuperscript{st}, notification of the end of a Subaward goes to AO and Requisitioner 30 days before Subaward End Date.

- If the Subaward is continuing, \textbf{please let OSP know!}
- If the Subaward is in fact ending:
  - Please send the Final Technical Report to OSP;
  - along with any other Final Reports that you have.
Subaward Closeout Process

#2. Kuali Coeus Email Notice: “Subaward Has Ended”

As of December 31\textsuperscript{st}, notification of the end of a Subaward goes to the Subrecipient on the End Date.

- Your Subaward is Ending:
  - Please send the Final Technical report to the MIT PI.
  - Please send the other Final Reports to OSP.
- MIT reserves the right to withhold final payment pending receipt of all required Final Reports.
Subaward Closeout Timeline

- Subaward Expiration Date
  - OSP KC Notifies DLC: “Sub Ending – True?”
- Subaward Close Deadline
  - OSP KC Notifies Subrecipient CC: DLC
  - OSP First Follow-Up with Subrecipient
- MIT Close Deadline
  - MIT cannot meet our deadline if Subrecipient does not meet theirs
Subaward Closeout Documents

OSP can closeout a Subaward when we receive:

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<th>Responsibility</th>
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<tr>
<td>Invoice / Financial Report</td>
<td>OSP</td>
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<tr>
<td>Inventions / Patents</td>
<td>OSP</td>
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<tr>
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Send documents to osp-research-subawards-closeout@mit.edu

MIT cannot closeout the Prime Award until all Final Subaward Reports are received!
Wrap-up

• List of resources for help
  
  
  http://osp.mit.edu/grant-and-contract-administration/subawards-overview/subaward-closeout

• Link to this Forum presentation:
  
  http://osp.mit.edu/help-and-training/ospforums