

Sponsored Project Closeout

Approved: 30Apr26

Administering Unit: Graduate School and Research

I. Purpose

The purpose of this policy is to provide guidance for project closeout on sponsored projects in compliance with 2 CFR Part 200 *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)* and other sponsor requirements.

It further sets forth detailed requirements for the complete and timely submission of financial reports and other closeout procedures for sponsored projects.

II. Definitions

Project Closeout: The process of completing all internal procedures and meeting all sponsor requirements to terminate or complete a sponsored project. Closeout includes submission of all required final reports within the time frames required by 2 CFR 200.344 and liquidation of all obligations.

III. Project Termination Notice

After receiving the project termination notice, the Principal Investigator (PI) should contact the Office of Research Administration (ORA) and initiate the sponsored project closeout process.

IV. End Date of Sponsored Project

The end date of the sponsored project is the end date stated in the sponsored agreement. Modification of the end date may only be made with approval of the sponsor as follows:

- **Federal Grants** – If the project falls under Expanded Authority, the University may approve a one-time no cost extension (NCE) of up to one year. The PI may request an NCE under Expanded Authority through the ORA Prior Action Request (PAR) process. Once the University approves the extension, ORA will notify the agency of the extension. If the project does not fall under Expanded Authority, written approval from the sponsoring agency must be obtained. Check the sponsoring agency guidelines for specific requirements. Most agencies require a request for the extension be made no later than 10 days prior to the award end date. ORA will revise the end date following receipt of written agency approval.
- **Federal Contracts** – Written approval for an extension must be obtained from the sponsoring agency at least 10 days prior to the contract end date. ORA will revise the end date following receipt of written agency approval.

Other Sponsored Projects – Written approval for an extension must be obtained from the sponsoring agency by either the PI or ORA at least 10 days prior to the end date of the sponsored project in accordance with agency guidelines. ORA will revise the end date following receipt of written agency approval.

V. Financial Closeout Procedures

The Principal Investigator (PI) is responsible for spending sponsored project funds in alignment with the approved budget, timeline, and sponsor and university guidelines and policies. If unallowable costs are charged to the sponsored project, the PI is responsible to identify a qualifying fund to which the unallowable costs will be transferred.

Purchases of equipment, supplies, and/or computers using sponsored project funds are not allowed within 90 days of the end date of the sponsored project.

Purchases using Pcards are not allowed to be charged to sponsored project funds within 30 days of the end date of the sponsored project. The Purchasing Department will remove a sponsored project fund from Pcards 30 days prior to the end date of the sponsored project.

The PI is responsible for coordinating with appropriate university offices to stop recurring charges to sponsored project funds (e.g. communication charges, personnel salary / wages and fringes, and technology fees).

ORA will:

- Ensure all invoices are issued and payments / reimbursements received
- If the sponsored project fund is in deficit, transfer appropriate costs to a qualifying fund identified by the PI
- If the sponsored project is in surplus, return unspent funds to the sponsor, carry forward the funds as approved by the sponsor, or if applicable, transfer the funds in accordance with the Sponsored Project Residual Funds policy
- Work with the Controller's office to close the sponsored project fund

PIs and departments must retain copies of all supporting source documents and expenditure documentation related to direct costs charged on a sponsored project for at least three (3) years from submission of the final financial report, or longer if required by 2 CFR 200.334 or the sponsoring agency.

All obligations must be liquidated no later than the closeout deadline established by the sponsor or required under 2 CFR 200.344(c).

For projects involving subrecipients, the PI and ORA must ensure that all subrecipients have submitted final invoices, technical reports, property reports, and other closeout deliverables in accordance with 2 CFR 200.344(b).

VI. Closeout Reports

Reports required at the close of a sponsored project vary by the type of sponsored project and sponsor. Most federal sponsors require financial, invention, and technical reports. Most federal contracts also require a property report, contractor's release form, and a contractor's assignment of refunds, rebates, and credits form. These reports are generally due within 120 days from the end date stated in the sponsored agreement.

- **Final Technical Reports** – Upon termination of the project, the PI is responsible for submitting the final technical report to the sponsor within the time frame specified by the agency. Failure to submit this report in a timely manner could jeopardize future funding from the agency. Some sponsors require use of their own form for final technical reports and / or encourage electronic submission of final reports. These forms are available in the sponsor's application packets, with the award document, or online. The PI must follow the sponsor's instructions for the preparation of final technical reports, which normally include a list of publications resulting from the sponsored project. A copy of the cover page of the final report or its transmittal letter must be forwarded to ORA to be retained for audit purposes.
- **Final Financial Reports** – Upon termination of the project, ORA is responsible for submitting the final financial report to the agency within the required time frame. The final report is reviewed with the PI prior to submission to the agency.
- **Final Invention Reports** – Copies of the final invention report or a certification form will be sent to the PI by ORA. The PI must complete and return the form to ORA for submission to the sponsor.
- **Final Property Reports** – Final property reports will be prepared, certified, and mailed to the sponsor by ORA.

- Other Reports – Most federal contracts require a contractor's release, and a contractor's assignment of refunds, rebates, and credits form. ORA will complete these forms and submit them to the agency.

Post-closeout adjustments, continuing responsibilities, and potential refunds or collections will be handled in accordance with 2 CFR 200.345.