Necessary Changes to Meet the NEW Federal Closeout Policies

Recharge Center Brown Bag #7

June 5, 2015
ASRSP Reporting

- ASRSP sends reports to the federal government in 3 ways.
  - **Weekly** Drawdown of Expenses per grant
    - Report is Based on what posted on NUFinancials
  - **Quarterly** Federal Cash Transaction report that details grant expenses by quarter.
    - Report is based on what posted in NUFinancials for Gov. Quarter.
  - Financial Status Report (FSR)- due **annually or at the end of a grant** depending on the mechanism.
    - Report is based on NUFinancials but could include encumbrances or trailing expenses that have been identified and audited for compliance.
- What has changed: The fact that the government wants all 3 to match at closeout within 90 days
Summary of Notices Received

3 Important Notices:

*From: DHHS, Uniform Guidance, NIH Notices*

- Bottom line: Federal government agencies want to close awards bilaterally within **90 days - Bilateral**
  - All reports sent to the Federal Government match and are in agreement with NUFinancials.
  - Fun facts: ASRSP sends 3 important reports, during the course of a grant they most likely will not match due to timing of reporting. However government expects them to match by day 90 of closeout since that is a point of convergence for all 3.

- NIH Closeout FAQ informs us of **unilateral** close at 180 days.
New Closeout Timeline
for 610 funds (DHHS and NSF)

12 Month Budget Period → 120 days after Expiration of Budget

Dept. Processes Transactions → Final Action Date

Final Action Date
→ GCFA Prep's Final Invoice/Report

Final Invoice/Report Due
→ Closeout

15-45 Days After Budget End Date
30-90 Days After Budget End Date

NASA, Dept. of Ed, Dept. of Energy, DoD, are only 90. Not mentioned on this slide is the Federal Cash Transaction Report

Picture courtesy of University of Washington
Consequence of Mismatched Reporting

- Unilateral Close means NU has submitted reports that do not match by 179\textsuperscript{th} day after closeout. NIH will close out the award without NU consent or affirmation on 180\textsuperscript{th} day \textit{at lowest of the 3 reports submitted}.

- Also mentions FFR should match the FCTR, if they do not, they will close at the lowest reported amount.
Trickle Down Effect

• Department will be asking Recharge centers for timely billing to meet closeout
• Potential loss of funds for recharge centers that cannot bill grants that closed
• Recharge Center billing and posting expenses monthly must become a monthly objective
• Timeliness of requesting approved rate may have big impact on your revenue if processed late
• Upload journal issues
Please Take These Actions

• Bill Monthly!
  – Avoid last minute journals and quarterly billing

• Have New Rates approved before new fiscal year starts
  – Prior Fiscal Year Rates cannot be applied to new FY
  – FY15 rates expire on 8/31/2015
  – For FY16, Instructions will be sent to the cores in mid June
  – Submit FY16 rates worksheets to Cost Studies Latest August 14, 2015
    • Submit early to allow review (and update as needed)
    • Open labs on each campus (early July/ August) to assist you
      – Bring your worksheets and questions
    • http://www.northwestern.edu/coststudies/
  – Use approved FY16 rates to bill starting September 2015
Billing After Sponsored Projects Closed…

Avoid Late Billing! If Billing after 30 days (e.g., 45 days)…

- Charges may not be allowed if the service is billed after the Award End Date
  - A non-sponsored fund may be needed to pay for the late charges
  - Impacts on customers and additional administrative burden
Questions?