BTOP Webinar: CCI Closeout

Conference Call and Webinar

March 5, 2013
Agenda

1. Presentation on CCI Closeout Process
   - Aimee Meacham, Director, BTOP Program Services

2. Q&A
   - Aimee Meacham, Director, BTOP Program Services
   - Alan Conway, Branch Chief, NOAA Grants Management Division
Closeout Process

Broadband Technology Opportunities Program (BTOP)
Objectives

- Define Closeout and Stakeholder Roles
- Understand the Timing Related to Closeout Activities
- Identify Recipient Closeout Requirements
What is Closeout?

- Closeout is the process of ensuring that all funded project activities are complete and that recipients have met all requirements imposed by applicable laws, regulations, Office of Management and Budget (OMB) circulars, and award terms and conditions.

- Recipients can facilitate the closeout process by:
  - Demonstrating completion of funded project activities
  - Understanding all administrative and legal requirements
  - Completing and submitting closeout materials in a timely manner within the closeout period.
Closeout Points of Contact

- **NOAA Grants Specialist**
  - Serves as the recipient’s main point of contact throughout the closeout process, ensuring the proper submission of documents, addressing issues with document preparation, and serving as a resource for recipient concerns
  - Reviews and evaluates final award reports and documentation

- **NTIA Federal Program Officer (FPO)**
  - Initiates closeout discussion and reviews requirements with the recipient, remains active throughout the closeout process
  - Conducts preliminary review of draft award reports and documentation

- **Closeout Analyst**
  - Supports the Grants Specialist and FPO in working with the recipient to facilitate the closeout process
Project Closeout Timeline

90 days prior

- FPO initiates closeout discussion with recipient
- FPO sends recipient closeout notification e-mail and links to the BTOP website with corresponding material

60 days prior

- Grants Specialist/FPO/Closeout Analyst review draft closeout documents with recipient and provide feedback

30 days prior

- If applicable, recipient initiates ‘No Cost Extension – Prior Approval Required’ AAR

Award End Date

- Recipient receives system-generated notification, ceases all project activities (unrelated to closeout) funded by the grant
- Recipient submits final closeout documentation
- Program Office reviews programmatic information and sends closeout documents to Grants Office

90 days post

- Grants Office completes final closeout review, initiates deobligation actions, if needed
- Grants Office notifies Program Office and recipient
Prior to Award End Date

- FPOs will notify recipients of their upcoming award end date and provide links to supplemental documentation that is posted on the BTOP website. This includes a checklist outlining the activities that must be completed for the award to be closed out.

- Recipients should begin to discuss the closeout requirements specific to their particular projects with their FPOs.

- Recipients should also submit all required Federal interest documentation to the appropriate State office(s) before their award end date, and a scanned copy of this documentation will need to be submitted to Grants Online (GOL) during closeout.
Early Closeout

- A recipient may want to terminate its award early after completing all project goals.

- To initiate the process, a recipient should initiate a “Termination for Convenience” AAR and attach a letter from the recipient’s Authorized Organization Representative (AOR) requesting that the award terminate early. Once approved, this action will amend the award end date to the new requested end date. Upon project completion, the recipient will need to send all final closeout materials to its Grants Specialist, FPO, and Closeout Analyst to close out the award.
  - Amended award end dates will always fall on the last day of the month.

- Recipients wanting to terminate their awards early should submit their requests in GOL at least one quarter in advance of their current award end date.
How Does a Recipient Complete and Submit Closeout Materials?

- Recipients are encouraged to work with their Grants Specialist, FPO, and Closeout Analyst as they prepare closeout documents.
- Recipients must e-mail final closeout documents to their Grants Specialist (and copy the FPO and Closeout Analyst) before the end of the 90-day closeout period.
- Recipients should anticipate and plan for closeout related costs. Allowable costs during the closeout period include such activities as preparing the necessary closeout documents, conducting the required audits, and costs for project work completed prior to the award end date.
# Closeout Documentation Requirements

<table>
<thead>
<tr>
<th>Required Documents</th>
<th>Submission Method</th>
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<tbody>
<tr>
<td>Final Performance Progress Report (PPR &amp; APR) including both quarterly and annual reports</td>
<td>Post-Award Management (PAM)</td>
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<tr>
<td>SF-424C Budgets</td>
<td>GOL</td>
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<td>SF-425 Final Federal Financial Report</td>
<td>GOL</td>
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<tr>
<td>SF-428 Tangible Personal Property Report and SF-429 Real Property Status Report</td>
<td>GOL</td>
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<tr>
<td>UCC-1 Filings, Security Interest Covenants, and Attorney’s Certification</td>
<td>GOL</td>
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<tr>
<td>Program-Specific Audit (for-profit recipients)</td>
<td>GOL and Department of Commerce (DOC)</td>
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<td></td>
<td>Office of Inspector General (OIG)</td>
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<td>Verification that Recipient has met all Special Award Conditions (SACs)</td>
<td>FPO</td>
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**NOTE:** If applicable, recipients should submit a final reimbursement request to Automated Standard Application for Payment (ASAP)
Closeout Audit Requirements

- In accordance with their Special Award Conditions (SACs), for-profit recipients must submit a final Program-Specific audit within 90 days after the award end date
  - Recipients should continue to submit their audits to both GOL and DOC OIG
- Recipients with for-profit subrecipients need to ensure that those subrecipients submit program-specific audits within the 90-day closeout period in order to successfully close out the award
- All other recipients should prepare for their Single A-133 Audits, due within the earlier of 30 days after receipt of the auditor’s report or nine months after the end of their financial year in which the recipient expends $500,000 or more in Federal funds
After Closeout

- Grants Office will notify the recipient that the award has been satisfactorily closed.
- Recipients must maintain records relating to the grant for at least three years after receiving notification of official grant closeout.
- Recipients must continue to comply with any ongoing audit and property management requirements.
Additional Resources

- 15 CFR § 24.50 – Closeout Procedures for State, Local, and Tribal Entities
- Federal Program Officer (FPO)
- Closeout documents are available on NTIA’s website under Award Closeout Requirements at http://www2.ntia.doc.gov/compliance
Questions