PCC/SBA Closeout Training

Broadband Technology Opportunities Program (BTOP)

WASHINGTON, DC
April 11, 2013
Agenda

1. Presentation on PCC/SBA Closeout Process
   - Aimee Meacham, Director, BTOP Program Services

2. Q&A
   - Aimee Meacham, Director, BTOP Program Services
   - Jannet Cancino, Supervisory Grant Specialist/Grant Officer, NIST Grants and Agreements Management Division
   - Laura Breeden, Director, BTOP PCC and SBA Programs
Objectives

- Define Closeout and Stakeholder Roles
- Understand the Timing Related to Closeout Activities
- Identify Recipient Closeout Requirements and Closeout Documents
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

- **NIST 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
  - Performs final award reports and documentation review and evaluation

- **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
- FPO and recipient determine if no-cost extension is necessary

**60 days prior**
- Recipient initiates a closeout AAR
- If applicable, recipient initiates ‘No Cost Extension – Prior Approval Required’ Award Action Request (AAR) and submits required documents

**30 days prior**
- Recipient receives 90-Day letter from NIST
- Recipient prepares to stop all project activities by the award end date

**Award End Date**
- Recipient submits final closeout documentation via PAM
- Program Office reviews list of Intellectual Property submitted by recipients
- Program Office reviews Programmatic information and recommends Grants Office approval, via PAM
- Costs related to closeout activities may be funded by the grant after the award end date

**90 days post**
- Grants Office completes final closeout review, initiates deobligation actions, if needed
- Recipient provides additional information requested by the Grants Office
- Grants Office notifies Program Office and recipient that the award is closed out

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Made Possible by the Broadband Technology Opportunities Program

Funded by the American Recovery and Reinvestment Act of 2009
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 information 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 project with their FPO.

- Recipients should also submit all required Federal Interest documentation to the appropriate state office(s) before their award end date; and attach a scanned copy of this documentation to the final closeout documentation package. “Federal Interest documentation” refers to filings that establish the government's financial interest in substantial assets purchased or built with grant funds.

- Recipients should complete any budget modification Award Action Request (AAR) prior to the award end date, if applicable.
Recipients will receive a 90-day closeout letter from NIST that will request closeout documents.

Federal interest extends from the initial receipt of the equipment through a 120-day period after the project is completed. This interest is secured through a lien document. You are required to file a lien with your state by completing the Uniform Commercial Code (UCC) form. The lien must cover all equipment included in the grant.

5. Real Property Status Report (SF-425), when applicable - standard report to be used by recipients of Federal financial assistance to report real property status as defined in 15 CFR 14.2 and 15 CFR 24. A fillable form can be downloaded at:
   http://www.whitehouse.gov/ostp/grants_forms

6. Tangible Personal Property Report (SF-428, SF-428B, SF-428S), when applicable - standard report used to report all equipment purchased with an acquisition cost of $5,000 or more and reportable residual value. Equipment with a current fair market value of $5,000 or more must be listed, along with unused supplies with a residual value of $5,000 or more.

NOTE: If there are no items of equipment or supplies to report, write a comment in Section II of form SF-428 stating that "no items of equipment meeting the $5,000 threshold and no unused supplies have a residual value of $5,000 or more to report". Complete the top section of form SF-428 B and check, 1d. A fillable form can be downloaded at:
   http://www.whitehouse.gov/ostp/grants_forms

7. List of materials and/or products created, acquired, or developed using BTOP funds, including studies, publications, curricula, significant outreach campaign materials, copyrights, etc.

Failure to submit your closeout materials by the end of the 90-day closeout period will put your organization out of compliance with the terms and conditions of the award and may result in establishment of an Account Receivable for all Federal funds disbursed for the award, and denial of future grants to your organization.

Thank you for your prompt attention. If you have any questions regarding the above request, please contact Grant Specialist Michael Tekics at 800-875-6338 or via email at Michael.tekics@nist.gov.

Sincerely,

Michael Tekics
Grants Specialist

Attachments:
1. Federal Program Officer
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 upload the final PPR, FFR, and APR in their respective report packages in PAM, just as they have done throughout the course of the Program.
- Additional closeout documents should be attached to a final closeout AAR by the end of the 90 day closeout period in PAM.
- Recipients should anticipate and plan for closeout related costs. Allowable costs during the closeout period include such activities as preparing necessary closeout documents, conducting required audits, and making payments on invoices for costs of project work completed and/or billed prior to the award end date.
Recipients must submit the appropriate closeout documents before an award can be considered for closeout

<table>
<thead>
<tr>
<th>Document</th>
<th>Due Date</th>
<th>Submission vehicle</th>
</tr>
</thead>
<tbody>
<tr>
<td>Final ARRA</td>
<td>10-14 days after end of quarter</td>
<td>FederalReporting.gov</td>
</tr>
<tr>
<td>Final FFR (SF-425)</td>
<td>90 days after award end date</td>
<td>PAM</td>
</tr>
<tr>
<td>Final PPR</td>
<td>90 days after award end date</td>
<td>PAM</td>
</tr>
<tr>
<td>Final APR</td>
<td>90 days after award end date</td>
<td>PAM</td>
</tr>
<tr>
<td>Final Closeout AAR</td>
<td>90 days after award end date</td>
<td>PAM</td>
</tr>
<tr>
<td>Final SF-424a or SF-424c with actuals</td>
<td>90 days after award end date</td>
<td>PAM attached to AAR</td>
</tr>
<tr>
<td>Patent Report</td>
<td>90 days after award end date</td>
<td>PAM attached to AAR</td>
</tr>
<tr>
<td>List of Intellectual Property acquired or developed using BTOP funds</td>
<td>90 days after award end date</td>
<td>PAM attached to AAR</td>
</tr>
<tr>
<td>SF-428 tangible personal property report</td>
<td>90 days after award end date</td>
<td>PAM attached to AAR</td>
</tr>
<tr>
<td>SF-429 real property report</td>
<td>90 days after award end date</td>
<td>PAM attached to AAR</td>
</tr>
<tr>
<td>UCC-1 Filing (if applicable)</td>
<td>90 days after award end date</td>
<td>PAM attached to AAR</td>
</tr>
<tr>
<td>Program-Specific Audit (if applicable)</td>
<td>180 days after award end date</td>
<td>PAM attached to AAR and DOC OIG in Atlanta</td>
</tr>
</tbody>
</table>

NTIA requests that Final Performance Progress Reports (PPR and APR) be submitted 30 days after the end date
ARRA Report

- The ARRA report must be submitted within 14 days after the end of the quarter.
- ARRA report must be marked as “Final” and show 100% complete project status.
- Funds received should match expenditures.
- All vendors and subrecipients from previous reports must be included; report is cumulative.
- Recipients should consult their Grants Specialists if any excess funds remain.
Final FFR (SF-425)

- The FFR details all financial transactions from award inception to the completion of the award, including administrative costs that may be incurred during closeout.
- Final FFR may not include any unliquidated obligations.
- Line C (cash on hand) should be zero.
Final PPR

- The Final PPR should describe the recipient’s performance against project indicators for the final quarter (or portion thereof), using the same process and definitions as prior quarterly reports.

- The recipients should mark the PPR that covers the time period between the last quarterly report and the award end date as “Final”.
Final APR

- A Final APR should be completed using the same process and definitions as prior annual reports.
- A recipient must submit an APR for every year the award was active.
- If the award end date falls within 2013, the recipient will submit an APR for 2013 and will mark it as final.
- If the award end date is 1/30/2014, the recipient will submit an APR for 2013 and an APR for 2014, marking the 2014 APR as final.
The Final Closeout AAR should be created as an AAR package and should specify in the description that the attached documents are being submitted for closeout.

All file descriptions should be noted as “Final” in PAM.

Please include a list of documents under Section 8 in the AAR.
Final SF-424A or SF-424C

- Recipients submit a Final SF-424A or SF-424C detailing actual expenditures from award inception to the completion of the grant period, inclusive of closeout costs incurred after the award end date.

- The SF-424A should be used unless the major project purpose is construction, in which case the SF-424C should be completed.

- The SF-424A or SF-424C totals should align with the total federal expenditures and total match contributions (non-federal expenditures) listed in the Final FFR and PPR.
Final Patent Report

- The Final Patent Report is included as an attachment to the Closeout Letter sent by the Grants Office 30 days prior to award end date.
### List of Intellectual Property

<table>
<thead>
<tr>
<th>Category</th>
<th>Type</th>
<th>Resource Name</th>
<th>Descriptions</th>
<th>Format</th>
<th>URL</th>
<th>Organization</th>
<th>Contact Name</th>
<th>Contact Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning/Project Management</td>
<td>Planning Documents</td>
<td>Computer Kids Policy</td>
<td>The policy outlines acceptable and non-acceptable actions at the PDI level</td>
<td>Void document</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Recipients/Evaluation</td>
<td>Evaluation Report</td>
<td>Evaluation of Digital Literacy/Training Program</td>
<td>Report of findings from the training evaluation, which calculated data from more than 200 training participants</td>
<td>ForestPoint</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Training</td>
<td>Controls</td>
<td>Computer Basics [Spanish]</td>
<td>Durante la visita a la sede de la biblioteca se encontró que los estudiantes en español y en inglés aprovecharon el espacio para escuchar música, observar objetos, etc.</td>
<td>PDF</td>
<td>Sponsor's website</td>
<td>Digital Literacy Training Group</td>
<td>Ana Diaz</td>
<td>mediatraining.org</td>
</tr>
<tr>
<td>Outreach Materials</td>
<td>Public Service Announcement</td>
<td>Lorenz Computer [Spanish]</td>
<td>Radio PSA (promoted in English and Spanish) promoting training classes</td>
<td>Audio file</td>
<td>[website link]</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Outreach Materials</td>
<td>Press Release</td>
<td>Computer Training Helps Native Americans</td>
<td>Newspaper story in &quot;The Source,&quot; which can be seen and heard in Spanish-speaking communities.</td>
<td>Article</td>
<td>[website link]</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Outreach Materials</td>
<td>Other Media</td>
<td>Rescue from tragedy discrete</td>
<td>Materials include videos: training classes during October</td>
<td>Files</td>
<td>Email address</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

- Recipients should upload a list of materials created, acquired, or developed using BTOP funds, including studies, publications, curriculum, and/or work products (e.g., links on website to reports, datasets).
- Recipients should be aware that NTIA may ultimately request copies of these materials once a final hosting location is determined.
List of Intellectual Property (IP) – Resource Submission

- Upon review of the IP list, your FPO may request certain resources and materials that may be useful to researchers and other organizations

- Recipients will have multiple ways to send files to NTIA
  - PAM (preferred)
    - Submit as Program Other Request (POR)
    - File size limit is 32 MB, up to 9 attachments may be uploaded in one POR
    - Multiple PORs may be submitted
  - FTP (preferred)
    - DOC FTP site: https://sft2.doc.gov/courier/web/1000@/wmLogin.html
    - Send to FPO and DHerndon.ctr@ntia.doc.gov
  - Email
    - Email to FPO cc: DHerndon.ctr@ntia.doc.gov
  - Physical Media
    - DVDs and CDs
    - USB drives are not accepted per DOC IT policies
Recipients account for BTOP-funded tangible personal property by completing a SF-428, SF-428B, and SF-428S.

All recipients must submit a SF-428 cover sheet and Attachment B (if there is no tangible property to report, recipients should write “Not Applicable” under Section 8).

A supplemental sheet, SF-428S, may be necessary to provide detailed information for each item.
The SF-428B is used during award closeout to allow recipients to request disposition instructions for equipment items (items with a per-unit acquisition cost of $5,000 or greater).

Recipients select all applicable options in Section 1 and complete the corresponding questions 2a-2c.
SF-428 Attachment S

- The SF-428S is used by recipients to provide detailed information on individual items.
- Grantees who checked “Yes” to Question 7 on the SF-428 or selected option 1b on the SF-428B should complete Attachment S or submit an equivalent document.
* Recipients account for real property (e.g., land or improvements) by completing a SF-429
* All recipients must submit a SF-429 cover sheet even if there is no real property to report
* Only those who purchased/improved real property using BTOP funds or contributed it as match must complete the SF-429A
The SF-429A allows recipients to provide the requested information in section 13-18 of Attachment A for each parcel of real property reported.
Federal Interest - Covenant Of Purpose, Use And Ownership

- NTIA retains an undivided equitable reversionary interest in all real or personal property that recipients and subrecipients acquire or improve using Federal or match funds, for the entire useful life of the property.

- During the duration of the Federal Interest, recipients cannot sell or transfer the asset without prior Grants Office approval or use the property for non-BTOP purposes without prior approval.

- Recipients with substantial assets acquired with federal or match funds have to submit applicable documentation:
  - Covenant of Purpose to document the Federal Interest in **real property**
  - UCC-1 to document the Federal Interest in **fixtures** or **personal property** other than supplies
  - Attorney Certification that documents were properly executed and filed in accordance with state law.
Program Specific Audit (For-Profit recipients only)

- Commercial and for-profit entities may have to submit a program specific audit if the recipient received a BTOP award greater than $100,000.

- A copy of the Audit Report must be submitted within 180 days of the award end date to the DOC Office of the Inspector General (OIG) and PAM. This audit must include costs incurred during the closeout period.

- For-profit entities required to do a program-specific audit during the closeout period may pay for those audit expenses using BTOP funds.
After NTIA reviews and submits closeout documentation, NIST conducts a final review and takes the remaining steps to close the grant

- NIST Grants Office will perform financial reconciliation and notify the recipient that the award has been satisfactorily closed
- If applicable, the Grants Office prepares a Deobligation Memo and submits it to the NTIA Budget Office
- Recipients must maintain records relating to the grant for at least three years after the recipient submits its final federal expenditure report
- Recipients must continue to comply with any ongoing audit and property management requirements
Early Closeout

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

- To initiate the process, a recipient should initiate an “Other” AAR and attach a letter from the recipient’s Authorized Organization Representative (AOR) requesting an amendment to the award end date. 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 quarter.

- Recipients wanting to terminate their awards early should submit their requests in PAM.
What happens after the award closes?

- After the award is closed, Recipients must continue to:
  - Use BTOP-funded equipment for the purposes under the award
  - Retain grant files and related records for at least three years
  - Complete an inventory of grant-funded equipment
  - Update UCC-1 filings every five years
Additional Resources

- **15 CFR § 14.71** – Closeout Procedures for Non-Profit and Commercial Entities and Institutions of Higher Education

- **15 CFR § 24.50** – Closeout Procedures for State, Local, and Tribal Entities


- Closeout documents are available on NTIA’s website under Award Closeout Requirements at [http://www2.ntia.doc.gov/compliance](http://www2.ntia.doc.gov/compliance)

- Additional guidance on completing closeout forms is available on the [BTOP Collaboration Wiki](http://www2.ntia.doc.gov/compliance)
Questions