



CCI Closeout Process Webinar

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Speakers

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- Eli Veenendaal, BTOP Business and Industry Specialist
- Larry Jenkins, Grants Officer, Grants Management Division, NOAA

Q&A

Q: Is the closeout period 90 days or three months?

A: The closeout period begins the day after the award end date and runs for 90 calendar days. Example: For an award with an end date of June 30, 2013, the closeout period begins on July 1, 2013 and runs for 90 calendar days through September 28, 2013.

Q: The award end date can only be moved earlier not later, correct?

A: Correct. As of the date of this webinar, BTOP projects are expected to be completed within the award period identified on the CD-450.

Q: Is there an incentive for recipients to close out early?

A: Yes. Once recipients close out their grant awards, they are no longer required to submit reports or account for program income. If a recipient has completed all award activities but has not closed out the award, the recipient must continue to comply with these obligations. Once a recipient completes all of the closeout activities, the NOAA Grants Office may close out the award. However, if a recipient draws down funds (the date funds reach their account, not when the request was made) then the recipient must report to FederalReporting.gov for that quarter. Example: If a recipient requests funds on September 29, 2012 and receives the funds on October 1, 2012, then the recipient must submit a report to FederalReporting.gov for the period beginning October 1, 2012 and ending December 31, 2012.

Q: It sounds like unless a recipient is going to move up the date by more than 90 days, it does not make sense to modify the grant award end date. Just finish when you finish and start working on closeout activities a little early.

A: Yes, NTIA's recommendation on early closeout is consistent with this view.

Q: If a recipient amends an award to close out early, does the audit have to be completed prior to closeout? What if the recipient is not being reimbursed for audit costs?

A: For a year 3 award, if the recipient closes out the award early, then program-specific audits are due under the same timeframe as a timely closeout. In other words, the program-specific audit is due by the end of the 90-day closeout period. A-133 audits are due within nine months of the end of the recipient's fiscal year. Thus, the due date for an A-133 audit does not change if the award end date changes.

Audit activities are generally allowable expenses during the closeout period. For early closeout, recipients must ensure that they have accounted for audits as an allowable cost before their ASAP account is closed. NTIA recommends that recipients begin to plan to complete their audit early to ensure that those costs are



reimbursed.

Q: If a recipient proposes to deploy 500 miles of fiber in its application and only 490 get done, but the recipient pays for the last 10 miles itself, does that count as match?

A: It depends on the timing of the completion of the last 10 miles and whether it satisfies the matching requirements. Matching requirements may be satisfied by either or both of the following: (1) allowable costs incurred by the grantee under the assistance agreement; or (2) the value of third party in-kind contributions applicable to the period in which the matching requirements apply. Recipients should direct project specific match questions to their Federal Program Officer and the NOAA Grants Office. All work with Federal or matching funds must be completed by the award end date. If a recipient is requesting an earlier end date, then all work must be finished by that date.

Q: How does a recipient know when it is "done" building a network? Is project completion based on milestones such as miles or community anchor institutions (CAIs)?

A: A project is considered complete when all activities proposed in the application that NTIA funded are completed and all required matching funds have been contributed to the project.

Q: During the application stage, many recipients estimated the total number of miles that would be built. Is there a project completion margin for recipients that build over/under the number of miles originally proposed?

A: NTIA will evaluate this on a case-by-case basis. Recipients that build over the number of fiber miles proposed should include this in their environmental assessment. If the estimated number of fiber miles was rounded up on the application, the actual number may be adjusted through an award modification.

Q: Does the three-year record retention period start after the award end date or after the closeout period end date?

A: The record retention period starts on the day the recipient submits its final expenditure report.

Q: Can the Inspector General audit a recipient after the three-year record retention period ends?

A: Yes, the Inspector General can audit recipients at any time. The recipient is required to maintain records for a minimum of three years. However, if a recipient has records present after the three-year period when an audit occurs, then those records have to be made available to the Inspector General. If any litigation, claim, or audit is started before the expiration of the three-year period, the records shall be retained until all litigation claims or audit findings are resolved. Records for real property and equipment shall be retained for three years after final disposition. (Please review equipment disposition regulations at 15 CFR 14.32-14.34.).

Q: A recipient has a special award condition for which it needs to have an outside program-specific audit after the third year. Does the audit have to be completed within the closeout period and does the recipient have to pay for the audit within the closeout period to be reimbursed under the grant?

A: Yes to both questions.

Q: In addition to paying closeout costs during the closeout period, can a recipient also pay costs incurred during the grant award period in the closeout period?

A: The purpose of the closeout period is to reconcile all outstanding invoices incurred during the grant award period. A recipient can pay invoices during the closeout period for general project activities as long



as the activities occurred during the grant award period.

Q: What are some examples of allowable costs that may be incurred during the closeout period?

A: To be allowable, costs incurred during the closeout period must have a nexus to closeout activities. As a result, administrative costs (related to closing the award) such as costs related to accounting and reporting are examples of allowable costs. Recipients may also pay final invoices from the project during the closeout period, but they may not incur any new costs for project activities. Contact your Federal Program Officer (FPO) and NOAA Grants Specialist with specific questions.

Q: Are filing fees for UCC documents (registering NTIA's security interests) acceptable closeout charges or does that need to be done prior to the award end date?

A: NTIA strongly recommends completing UCC filings during the award period of performance, but these filing costs may be incurred during the closeout period.

Q: Do recipients need to complete quarterly reporting as part of their final reporting requirements?

A: Recipients' final reports contain both cumulative and quarterly data.

Q: Should recipients draw down funds for their closeout expenses from ASAP before the closeout period begins?

A: Recipients should discuss this activity with their Federal Program Officer and the NOAA Grants Office.

Q: What happens if a recipient has not drawn down funds for the last few miles of construction on their project by the grant award end date?

A: The federal government will only pay for work completed before the award end date. Recipients, however, may receive final invoices for this work after the award period ends. Recipients may pay for these expenses during the closeout period.

OMB has ruled that once a recipient's ASAP account is closed it cannot be reopened. Therefore, it is imperative that recipients reconcile all outstanding invoices before their ASAP accounts are closed.