**TRANSCRIPT**

**NIH Grant Closeout Process - Administrative and Financial Essentials**

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Megan Columbus: Thank you so much for joining us today for this webinar on the NIH Grants Closeout Process. My name is Megan Columbus, I am the Director of the Office of Extramural Research's Division of Communications and Outreach here at the National Institutes of Health. I see that we have just about two thousand people joining us already. As we wait for the others to join, we'd like to learn a little bit more about who you are. So, if you wouldn't mind answering the poll that's on your screen, we want to hear who's Financial Officers, who's Investigators, trainees, etcetera, so we understand who our audience is a little bit better.

As you're doing that, I want to talk a little bit about why we're here today. Closeout is an area of very high visibility and priority for both the HHS and NIH. Ensuring timely closeout and reporting on federal dollars is such an important aspect of responsible stewardship of federal funds. So, NIH has been engaged with HHS on recent and ongoing efforts related to systems, business process enhancements, so it's important for us to communicate and provide ongoing outreach to our applicant and recipient community to ensure that you all understand what those requirements are.

Before we go into some logistics, how about we see a little bit about who's here? Can we see the results of the poll, please? All right. It looks like we've got lots of grants administrators, at about 45 percent. Department administrators about 32 percent, Financial Officers about 13 percent. Looks like that's exactly the community that we're targeting. Kudos to you guys, the 2 percent of Investigators, and the 1 percent of Research Trainees and Postdocs that are joining us, the federal staff who are interested in what we're talking about, and everybody else who's joining us. Thank you so much.

All right, so some logistics. We have already received some questions during the registration process -- thank you so much for submitting those. And we'll be responding to some of the more common questions that we received as part of the presentation itself, and some of the Q and As that we'll be doing during the presentation. You're also certainly welcome to submit questions throughout the process. You can submit them using the Q and A box on your screen. That's where we'll be handling the questions. We'll only be using the Chat to communicate one way from us to you, and we'll be providing you important links, and those kinds of things.

The PowerPoint, in case you want to follow along in real time is already available on the Event Page, and just so you can prepare, the recording of this event will be available in seven to ten business days.

All right, with that, let's get to the important stuff. Let me introduce our fabulous presenters for today. Kasima Garst -- she is the Director of the Division of Grant Systems Integration, within the Office of Policy for Extramural Research Administration here at NIH. And with us as well is her colleague, Alan Whatley, who is a lead for the grant's financial analyst, with the FFR Reconciliation and Financial Closeout Center. He is also with the Office of Policy for Extramural Research Administration in OER. With that, I'd love to turn it over to Kasima.

Kasima Garst: Thank you, Megan. And welcome everybody. We are very excited to be here today. We are going to get started, but first I wanted to give a brief overview of what our agenda will be for this afternoon. First, we'll start off, I will be providing an overview of NIH closeout and various administrative requirements for grants closeout. And then I'll turn it over to Alan to discuss some of the financial requirements related to closeout. And then we'll end with a few key takeaways and reminders for the audience. And then we'll get into some of those extra questions that we've received, as well, in advance as part of registration, and also throughout our presentation.

Let's go ahead and get started with the overview of our administrative closeout requirements. Kicking it off, let's first start off with what, exactly, is closeout. So, closeout of an award is the process by which NIH determines that all applicable administrative actions and all required work of an award have been completed by the recipient and NIH. The relevant policy and procedures are documented within our NIH Grants Policy Statement. We do have sections specifically dedicated to closeout, as well as some additional information related to specific grant award types, and I'll get into that in some upcoming slides. NIH continues to require and enforce longstanding closeout requirements, specifically that all of those required documentation are due within 120 days of the project period end date. The three main reports that are required are the Final Research Performance Progress Report, the Final RPPR, the Final Federal Financial Report, or FFR, also known as the SF 425, and the Final Invention Statement and Certification, or the HHS 568. NIH will initiate unilateral closeout, including any potential enforcement actions if a recipient fails to submit final reports on time, so it's very critical that you keep that in mind.

So, let's take a look at the next slide, where we outline these requirements in a little bit more detail. As you can see here, there are some different requirements based on the mechanism or the type of grant that a recipient may have. The first line in our table outlines and calls out Research grants, but really, this is for the general requirement for all research and other grant mechanisms not otherwise specified, like our Career Development Awards and our SBIR STTR Small Business Awards, and so forth. In this case, all the three main requirement documents are required. This is the Final RPPR, the Final FFR, the Final Invention Statement, and so forth. What we call out a little bit differently, when you look at institutional training grants, so this is going to be your T series, your D43s, and so forth, that will have those final requirements for the Final RPPR and the Final FFR. But you will instead not have a requirement for the Final Invention Statement, but you will also be required to submit termination notices for any NRSA trainee appointments. So those are specifically for those T series grants for our NRSA Institutional Training Awards.

Speaking of NRSA, in the case of Individual Fellowship Awards like the F series, you'll see here that the only requirement is a Termination Notice. In particular, there are no requirements for the submission of a Final RPPR, a Final FFR or a Final Invention Statement, but I believe my colleague, Alan's going to speak a little bit about the financial requirements, even though a Final FFR is not required.

Going on to the next slide, I also just wanted to quickly highlight a couple of other closeout requirements that we do call out within the NIH Grants Policy Statement. I'm not going to go through these in detail, but we are providing them in the slides for your resource. And really, it's the highlight that there are sometimes some special additional requirements. Many of these are related to what is being reported as part of the final progress report that are specific to these different mechanisms. So, for example, in the case of the training awards and the fellowship awards, as I mentioned, the requirements specifically around the Termination Notice. And then there's also some specifics in construction awards and things like that, that just have to do with what is being reported as part of that Final RPPR.

And next, now that we know what's required, how do you get them into us to review? So, this section of the NIH Grants Policy Statement that's listed on the slide outlines how the documents are required to be submitted. All closeout documents must be submitted through electronic systems, whether it's eRA Commons or the Payment Management System, otherwise known as PMS. And the table outlines how each of those things are submitted. So, for example, the Final RPPR is submitted through the eRA Commons, through the RPPR module. The Final FFR is submitted through the Payment Management System. The Final Invention Statement is also submitted through eRA Commons, and then the Termination Notice is submitted through the eRA Commons xTrain module. What the great thing about the eRA resource is in particular is that there's lots of online help and video tutorials to help you with any of those questions about how to find and submit those required reports. And then in terms of the FFR submission, not only is there training available through PMS, but you can also access the linkage into PMS through your eRA Commons accounts. So, lots of great, helpful resources from eRA.

NIH also issues remainder notifications for any grants where at least one of the required closeout reports have not been submitted as of the date of the notification. We send out two reminder notifications prior to that 120-day due date, so we issue a reminder at 10 days and 90 days after the project period end date, and then we send notifications of noncompliance after the 120-day period, and 150 days after the project period end date. NIH also sends monthly reminder email notifications to recipients for Final FFRs in rejected status. So, we do our best to make sure that we reach out and notify our recipient community when those documents are past due, but it's also incredibly important for you to track that information within your systems. And the eRA Common Status module and closeout modules have information on how you can search for the status of any grant award as it relates to the closeout.

On the next slide, I wanted to also highlight some of those requirements related to those unilateral actions. NIH will initiate unilateral closeout for all awards that fail to meet closeout requirements, and ensures that all awards are closed within one year after the project period end date. Earlier this year, we issued a notice just emphasizing the enforcement of these unilateral closeout reporting actions, and the requirement for NIH to report any unilaterally closed awards in the system for award management, SAM.gov, responsibility qualification. We are required to submit these determinations for any entity that does not submit all required closeout reports within that one-year period performance end date, and any awards that are closed unilaterally are going to be displayed in SAM.gov via the Contractor Performance Assessment Reporting System, or CPARS, and it is available in SAM.gov for five years. Now, that being said, recipients are able to comment on that report in CPARS in response to that reporting, but we are required to repose that report for any unilaterally closed awards. The key thing to keep in mind is that we're going to initiate that unilateral closeout procedure for any awards failing to meet the closeout requirements within a 270-day period, so effectively, we're going to have to start moving that process forward if those reports are delinquent and closing all awards within that required one-year period.

Now the main thing to keep in mind is that closeout overall is a process that involves responsibility on both the recipient and the NIH Institutes and Center's side of the process. Now what we've laid out here on this slide is just a high-level understanding of the different roles and responsibilities between the recipient, any subrecipients and NIH staff. They key thing to emphasize if you are the grant recipient is that you are ultimately responsible for the primary compliance with all the terms and conditions of the NIH award. You're responsible for ensuring that the subrecipients are also in compliance with those terms and conditions of the award, and you are responsible for the submission of those timely and accurate closeout reports. What's also really important to emphasize, that it's important to have timely communication with NIH staff in the event that you're running into any challenges, or have any questions related to the closeout requirements and ensuring that you meet those timely deadlines. For subrecipients, the terms and conditions of the award do flow down to the subrecipient, and this is in accordance with 2 CFR 200 part 101. And this includes the closeout requirements. So, you are responsible for the compliance with those applicable terms and conditions of the award, as well as the written consortium agreement that is entered into with the primary recipient.

And just as it is important for the prime recipient to communicate timely with NIH regarding closeout and other prior approvals, it's also important that the subrecipient timely communicates and engages with the recipient to ensure that those closeout requirements are able to be met. For example, it lays out in the Grants Policy Statement, Chapter 8.6, that a subrecipient is responsible to submit to the recipient no later than 90 calendar days, or an earlier date if indicated in the written agreement between the recipient and subrecipient, all of the reports required by the terms and conditions of the award. So, it's really important for the subrecipients to report up to the prime recipient in order to ensure for timely closeout of those awards. And then for NIH staff, we are responsible for reviewing and the review acceptance and approval of all closeout reports. So, for example, the program officer responsible for reviewing and accepting the Final RPPR, while our amazing FFR Center is responsible for the review of the reconciled FFR reports and financially closing the grants in the Payment Management System, we are, as I mentioned, ensuring that closeout is completed within one year from the primary project period end date, and that if unilateral closeout is initiated, if reports are not included timely, that we will also report all unilaterally closed awards for noncompliance in SAM.gov.

So, I'm going to take a step here and pause for a minute. I think, Megan, there might have been some questions from our audience as part of registration before we shift over to the Financial Closeout requirements.

Megan Columbus: Yeah, thanks so much, Kasima. We've been getting a steady stream of questions coming into the Q and A, and that's great. And we're going to get to all those questions at the end of the webinar. We're going to be working through as many as we can. These are just some that came in ahead of time, and we had a number of people who are very interested in whether there are special requirements for non-US, or foreign recipients. Can you speak to that?

Kasima Garst: That's a great question. So, there's nothing special in terms of the inherent nature of being a direct foreign recipient in terms of the required closeout documentation. So based on that earlier slide, a direct foreign recipient is responsible for the same required closeout reports, and a lot of the other requirements. Any special requirements for foreign recipients still apply as outlined in Chapter 16 of the Grants Policy Statement. But in terms of the required closeout reports and the timeline, the deadlines for submission of those reports, those are unchanged. So, they're the same as domestic recipients.

Megan Columbus: Great. Thank you so much. So, if they're requesting a no-cost extension, or they have active trainee appointments, should they still be submitting closeout reports?

Kasima Garst: That's a great question. So, this is where that timely communication with NIH staff is particularly critical, right? So, any prior approval request, really duty to be resolved prior to the project period end date, the Grants Policy Statement is very clear that you are supposed to be submitting those prior approval requests before the project period ends. And I'll also let Alan weigh in as well, because the reconciliation of those required reports is really -- there are some downstream negative impacts if those reports are submitted before the project period is actually resolved, if the project is going to be extended.

Now that being said, you have to communicate early and often with your awarding institute or center if there are any questions about these cases, but particularly communicate if there are any of these pending prior approval requests that will impact your ability to successfully report on the closeout documentation. So, for example, it's difficult to close an award if you have an active trainee appointment, so you'll want to make sure that you're appropriately resolving those appointments in order to submit accurate closeout reports, right? So that's where that communication with the IC is key.

Alan, would you like to speak to some of those financial impacts if those actions are pending?

Alan Whatley: Yes. Thank you, Kasima. I would like to address the portion of the question for the trainee appointments as it relates to the Final FFR, and we're going to get into the specifics of the Final FFR when I start my presentation. But I do want to address that portion of the question, because it is a great question. So of course, when it comes to the Final FFR for training grants where there are trainee appointments. On a Final FFR, a recipient is not able to report unliquidated obligations. And the unliquidated obligations field of the FFR is the field that's utilized to report trainee appointments. And so, if it's not allowed on the Final FFR, it presents a problem for the recipient. And this is how this issue is addressed.

The recipient has the ability to get that Final FFR converted to an annual FFR, and on the annual FFR you will, indeed, be able to report the unliquidated obligations that you need to report. And so, we put out a guide notice a couple of years ago, specifying the exact process that the recipient will need to go through in order to get that Final FFR converted to an annual so you can report your unliquidated obligations. And so, I'm going to put that guide notice in the Chat, and that will allow everybody to have access to the exact documentation and procedures letting you know what has to be done in order to get that FFR converted in a very broad sense, as I'll put that in the Chat. It's a matter of reaching out to the Grants Management Specialist, the Institute Grants Management Specialist, for that award. And that Grants Management Specialist will then work with the eRA to get that Final FFR converted to an annual. They'll communicate back to you, the recipient, when that's completed, and then you can submit that FFR and report the unliquidated obligations in the final year of a competitive segment. So, I'm going to put that guide notice in the Chat, and you'll have those procedures.

Megan Columbus: It sounds good. And I'm betting that guide notice is also on NIH's closeout page, so that people will know where to find it in the future, if they're looking. Thank you so much, Alan, for that comprehensive answer.

One more for you, Kasima, before we move on to Alan's presentation. How does a submission of a Competitive Renewal impact closeout requirements?

Kasima Garst: That's a fantastic question.

Megan Columbus: [INAUDIBLE] question.

Kasima Garst: Absolutely, it's a great question. So, the key issue with -- or the key thing to keep in mind is, with the Competitive Renewal application submission, or a Type 2 Application as it's commonly referred to, the applicant is required to submit an Interim RPPR. This is specifically to distinguish the fact that there's a possibility of the project being extended, if that Type 2 Application, or the Competitive Renewal application is successful. In the event that the Type 2 or Competing Renewal Application is awarded, then the Interim RPPR serves as the annual RPPR for the final year of the previous segment. In the case that the Completing Renewal application is not funded, then the Interim RPPR will convert and serve as the Final RPPR for that award. So, it will have the same elements as a Final RPPR, including those project outcomes, but depending on the award status of the Type 2 Competitive Renewal application, it will either be treated as an Annual RPPR or a Final RPPR.

Megan Columbus: Great. Thank you so much. All right, I know we have lots of questions here, so let's go ahead and get to Alan's section so that he can talk about what he needs to talk about, and then we'll move on. Thank you, Kasima.

Alan Whatley: All right. Thank you, Megan. And hello everybody. My name is Alan Whatley, and I will be discussing the financial requirements that lead to closeout. And just quickly, what is Financial Closeout? Financial Closeout can be referred to as an accepted, a reconciled and accepted Final FFR, which leads to a reconciled and closed document in PMS. And so first, we will look at the Federal Financial Report, also known as the FFR.

And what is an FFR? An FFR, also known as the Standard Form 425, is a statement of cash receipts, cash disbursements and expenditures reported against firms, awarded to a grant recipient institution. And so, in short, recipients are awarded funds, and you're required to report the expenditure activity back to the awarding institute at the end of the grant performance period. The frequency of FFR submission is determined by the grant's designation under the Streamlined Application Award Process, also known as SNAP. And so, if a grant is under SNAP, and FFR is required at the end of each competitive segment; one FFR at the end of each segment. So therefore, each FFR that's submitted would indeed be a Final FFR, because a Final FFR is any FFR submitted in the final year of a competitive segment, or in the final year of the grant, overall. And so, a grant under SNAP, each FFR would be a Final.

If a grant is not under SNAP, an FFR is required at the end of each budget period. So therefore, only the FFR submitted for the final year of the competitive segment would be a Final FFR, and all of the other FFRs that are submitted at the end of each budget period would simply be Annual FFRs. And so non-SNAP, you have Annual FFRs, with one Final in that final year of the competitive segment. And one final thing to consider for FFRs as of January of 2021, all NIH FFRs are submitted electronically through the Payment Management System, also known as PMS. For those that have been around for a while, you may remember when FFRs were submitted in eRA, but as of the past few years, we have made that 100 percent change, and all FFRs are submitted in the Payment Management System.

All right, so we're going to talk about some of the requirements for Final FFRs. Since we're talking about closeout here, we want to focus in on the Final FFRs, and what's required in order to successfully submit and eventually have accepted your Final FFR. And so, a Final FFR is required to be submitted within 120 days of the performance period end date. If it's submitted any later than that, that FFR will be considered late. And so, you want to get that FFR submitted within that 120 days after the performance period end date, in order to be compliant. In order for the Final FFR to be successfully submitted and accepted in PMS, the following fields must reconcile; they must agree with one another to the penny. And those fields are Field 10A, which is Cash Receipts, Field 10B, which is Cash Disbursements, and 10E, Federal Share of Expenditures. 10A, Cash Receipts, will be prepopulated based on the amount of money that you've drawn down for that particular grant document. And so, the first field that'll actually be input by you, the recipient, will be 10B, Cash Disbursements. And Cash Disbursements is required to reconcile with 10A on a Final FFR. And then next you move down to 10E, the Federal Share of Expenditures. You also input that amount, and again, 10E must reconcile to the penny with 10A and 10B. That's what leads to an accepted Final FFR, and a reconciled and closed PMS document is those three fields agreeing with one another. If those fields don't agree with one another, not only will the FFR not get accepted, but you can't even submit the FFR in PMS if those three fields do not agree. PMS has a hard stop, for those three fields must reconcile on a Final FFR, or it cannot even be submitted in the Payment Management System.

Another important consideration is if an indirect amount is included in your Total Award amount, then Indirect Expenses must be reported in Section 11 of the FFR. Section 11 is the Indirect Expense section. Some important considerations related to Indirect Expenses is, the Indirect Base, Field 11D, is the direct portion of the Total Expenditures reported and filled 10E. We receive a lot of questions as far as the Indirect Base, and so that's a great, direct, straight-to-the-point definition of your Indirect Base. You have your Total Expenditures in Field 10E which you're reporting Total Expenditures, direct and indirect, are reported in Field 10E. The Indirect Base, Field 11D, is the direct portion of those Total Expenditures. Another thing to consider, the Federal Share, Field 11F, typically agrees with the Amount Charged, which is Field 11E. The Indirect Base times the Indirect Rate is how you get the Amount Charged, 11E, and that is prepopulated, but Field 11F, you have to input yourself. And if you don't populate Field 11F with anything, it's going to simply say zero. So, you want to make sure that you populate 11F with the same amount that's in 11E, unless you have some reason that the Federal Share would be different than the Amount Charged, which would be very rare, and also could be something that you could disclose in the Remarks section of the FFR, if necessary. But make sure that you always populate Field 11F to agree with Field 11E, and that will help in the acceptance of your FFR.

Another thing to consider with regard to indirect is that 11D plus 11F cannot exceed 10E, because that indicates that your Indirect Expenses exceed your Total Expenditures, which, of course, just doesn't reconcile. And so, in order to prevent FFR rejection, that's something else that should be checked -- make sure that 11D plus 11F do not exceed 10E.

When a Final FFR is accepted, when all of those requirements have been met, when all of those financial requirements have been met that we just discussed, and the Final FFR accepted, the respective PMS document is closed. And that's what we want to reach, an accepted Final FFR and a reconciled and closed PMS document. And once that PMS document is closed, it can no longer be reopened for additional draws and-or expenditures. So, you want to make sure that when you submit that Final FFR, that it's accurate, that you've already received any possible additional invoices or refunds from subrecipients, that any internal invoices, refunds, any financial actions are complete when that Final FFR is submitted, because once it's accepted and that PMS document is closed, that's it. It can no longer be reopened for additional draws or expenditures, or any type of activity.

All right, and at this point I would also like to pause and give a chance to receive some of the pre-submitted questions. So, Megan, we have any?

Megan Columbus: Yeah, sure, a couple of fairly easy ones, I think, that were submitted in advance. And again, we have lots of questions coming in that we'll get to. But who should people contact if they have questions about their FFR submission? Would that be to NIH? Or would that be to the Payment Management System people?

Alan Whatley: Right, that is a great question. And I will always say that if you have a question about NIH FFR, please always start with NIH. Our contact information is going to be on one of the upcoming slides, but it's just a matter of reaching out to that mailbox, and we will get right back to it. And if it's something that needs to be addressed by PMS, then we will provide the correct PMS contact information. But I'll say to always start with NIH, if you have a question or issue on an NIH FFR.

Megan Columbus: Great advice.

Alan Whatley: Mm-hmm. That contact info will be coming.

Megan Columbus: Just one more. Who's responsible for the closeout requirement when a grant is transferred? I know a number of people have asked that question today as well.

Alan Whatley: Yes. Right, and so when a grant is transferred from one recipient to another, for example, the PI leaves one institution and goes to another one, what happens is that, of course, the same closeout requirements are required of the recipient that's relinquishing the award. And so, the recipient that's relinquishing the award still has all the -- the closeout requirements do not change. And so, from a financial standpoint, they have to submit a Final FFR. And when that Final FFR gets accepted, the unobligated balance of the FFR will transfer from the old recipient to the new recipient. And OPERA, we will prepare a transfer letter and send it to the new recipient, alerting them of the fact that this balance transfer to your PMS document, exactly what the amount is, and if that amount is immediately available for draw and expenditure. And that's determined on the carryover status of the prior award. So, if the relinquishing award has automatic carryover authority, then once you receive the unobligated balance, you have the authority to start the drawdown on it immediately. If the award from the relinquishing institution does not have automatic carryover authority, when that Final FFR is accepted, we will still transfer the balance to your organization. But you do not have the authority to spend it without requesting carryover approval from the awarding institute. So, the balance will transfer regardless, but the automatic carryover authority of the award --

Megan Columbus: Good point, thank you.

Alan Whatley: -- it would signify whether or not you have authority to spend the money that transferred.

Megan Columbus: Great. Thank you so much. All right, why don't we get through the last couple of slides, and then we're going to do lightning rounds of questions to see if we can get through some of these.

Kasima Garst: All right, thanks, Megan, and thank you, Alan. We are just going to close up with a couple of key takeaways and reminders for everybody. So first, and the first critical thing that I hope we have helped emphasize for you today is that timely submission of final closeout reports after the end of the period of performance, including any no-cost extension periods, is absolutely critical. Failure to submit these timely and accurate closeout documents may affect future funding to the organization. And failure to correct recurring reporting problems may cause NIH to take one or more actions that may include, but are not limited to, corrective actions, such as withholding or further awards suspension or termination. NIH will close out a grant as soon as possible after the end of the period of performance -- but again, no later than the one year after the period of performance end date in accordance with 2 CFR 200, Part 344. And this is specifically if the grant will not be extended or terminated.

The other critical piece to keep in mind, and as Alan very, very well said, PMS subaccounts must be reconciled prior to the submission of that Final FFR. And along with that, and part of the reason that we implemented that new rejected FFR reminder notification that occurs monthly, not only does it need to be reconciled before that Final FFR, but if NIH does have to reject and request a revision to that Final FFR, it's really important that that occurs in a timely manner, that those are corrected and then resubmitted.

And then lastly, as with this webinar, and I can definitely speak on behalf of my colleagues here in OER and at the ICs in saying that we're here to help. We have multiple support teams that are available to answer any questions you may have, or help you address any issues. Some of those are outlined on the slide. If you have specific questions about your grant awards, or any questions about the progress reporting, contact your grants management specialists and program officers those technical questions with PMS or FFR submission. From the technical side, there is, of course, needing to contact the eRA Service Desk. The eRA systems are the originators of the data that is used to create the FFR in and of itself, but as Alan said, the FFR team -- very small, very mighty, but really outstanding and fitting, being very responsive to those inquiries. We're here to help you through that process. And then, of course, if you have any questions specific to unilateral closeout, you can submit them to our colleagues at the Division of Grants Compliance and Oversight, and OPERA as well.

And as Alan mentioned, we just wanted to thank you all for your time and joining us today, and these are some of the different inboxes for reaching out to the various parts of OPERA that are here to assist you, as well as some links to some of the additional resources related to closeout, as we mentioned in the earlier slides. So, I'll turn it back over to you, Megan, so we can address some of your questions.

Megan Columbus: Thank you so much. You know, we've been addressing a few already in writing, and thank you so much to Michelle Bulls, who is helping us in the background answer some questions. She's the Director of the Office of Policy for Extramural Research Administration, so she's a great resource. If we could get Alan back on the screen, we are going to do a lightning round of questions. We have a lot of questions. We've got about 15 minutes. So, I'm just going to jump in. Can you request a no-cost extension after the awards end date?

Kasima Garst: That's a great question. So of course, it is a prior approval request, and it should occur before the project period end date. We recognize that sometimes there are some extenuating circumstances that may require a request, but we encourage everyone to submit those requests early, and to contact your Grants Management Specialist on your Notice of Award in case you have any questions. But the requirement is that it is submitted prior to the project period end date.

Megan Columbus: That's great. All right, we've got a couple of questions about K99s. Do they require an FFR? And what's the process if they need to request a terminate early when a PI leaves the institution?

Kasima Garst: So great question. So let me take the early termination first. Again, that's another example where you'll want to contact your Grant's Management Specialist in order to confirm next steps for the award specifically. And then in terms of the reports, I believe the FFR is still required as part of the financial reconciliation of those awards, but definitely refer to your Notice of Award for the specific closeout requirements. I know that in some cases, there may be some additional terms and conditions that I'm not recalling off the top of my head in terms of the standard closeout requirements for K99s.

Megan Columbus: Great. Sure. Some people have noted that sometimes FFR acceptance can take a while for approval. I'm sure there's a lot involved in that. Do we know -- do we want to explain a little bit about that?

Alan Whatley: Sure. We do have a great team here that reviews FFRs on a daily basis. We get, as you can imagine, tens of thousands of awards that we issue every year, with the same thing, tens of thousands of FFRs. And so, we review them absolutely as fast as we can. And what I will offer is that if there is the need to prioritize the review of an FFR and get one expedited, you can always reach out to us at the OPERA FFR Inquiries mailbox, and we will prioritize and get that FFR reviewed, expedited for you. So, communication is always key when you have an urgent issue related to an FFR, and we get to them as absolutely as fast as we can.

Megan Columbus: We do have someone who's asking whether the recipient is the institution, and not the researcher, and that is, indeed the case. I don't know if you have anything else to add about that, but yes, the institution is the recipient.

We have a number of questions about transferred awards and closeout process for that, but I thought that you already addressed those pretty thoroughly, so I'm going to keep going.

If the grant has completed way ahead of the project period end date, can the closeout process initiate early, or wait until the end date? How early is closeout allowed?

Kasima Garst: So, from a systems perspective, I believe that the actual triggering of a lot of the closeout documentation is specifically turned on, or activated, if you will. A grant doesn't enter the Open for Closeout status in our systems until that project period end date. Now you're certainly welcome to reach out to your Grants Management Specialist to communicate in some of those areas, but I believe the system will not open those specific reports until after that end date. So, I would reach out to your Grants Management Specialist to communicate any next steps in that regard. That being said, any of the preparations to begin pulling together that information, reconciling PMS to ensure that the financial aspects are all reconciled and taken care of before that Final FFR submission, those are all great ways to prepare for that piece.

Megan Columbus: Great. And so, the Initiate tab for the Final RPPR would become visible in the Commons at the point of the end period of the grant. Is that what you're saying?

Kasima Garst: That's correct, yes.

Megan Columbus: Okay. We have variations of that same question.

Kasima Garst: And the one extra thing I'll add about that, because I think this aligns with some of the questions, I've seen about the Interim RPPR -- the triggers around that competing renewal application submission will impact that some. So, for example, even though the Closeout tab may appear when that project period end date arises, if there is a competing renewal within the system, it will not open a Final RPPR. It's going to look and open an Interim RPPR instead, because it recognizes that there is a competing renewal application within the system. If that competing renewal application comes in after the period of performance end date, then you'll see the Final RPPR within the system, so sometimes it is an issue of timing to ensure that the system is looking at that project period end date, and the timing of when that competing renewal application has been submitted.

Megan Columbus: Great. Okay, so for grants with one or two no-cost extensions, what should the reporting period be for the Participant's tab in the RPPR? Should it include only personnel who worked during the last competitive segment budget period? Or should it also include personnel who worked during the no-cost extension?

Kasima Garst: So, my understanding is that the instructions outline that it's supposed to be during the reporting period, so since the last progress report. So, it would be based off of the period that you were reporting on. Now if there are specific questions, again, that may be specific to your project, you can reach out to your Grants Management Specialist. But my understanding is that the instructions are specific to for the period of which you are reporting on, so since the last progress report.

Megan Columbus: If the grant is terminated, does the deadline for closeout start at the negotiation date with a federal agency?

Kasima Garst: I'm sorry, can you repeat that question?

Megan Columbus: Sure. If the grant's terminated, does the deadline for closeout start at the negotiation date with a federal agency?

Kasima Garst: So in terms of -- in the case where an award is being revised to end early, which is, I think, usually what folks are referring to when they're saying "terminated" through that negotiation with the awarding IC -- when that award is revised to end -- make the project period end date align with that date of the new end of the award, then the standard system behavior in terms of opening for closeout will occur at that time. If there are any other special requirements, they may be noted in the terms and conditions of the award. But my understanding is that the system behavior will open in alignment with that revised Notice of Award.

Megan Columbus: Right. Okay, so we had a number of questions, not surprisingly, about managing closeout for subawards or subrecipients. So, do we have any suggestions for how best to manage closeout awards for subrecipients and subawards to ensure proper coordination and compliance?

Kasima Garst: So that's a great question. I know that, and I'm not sure if Michelle would like to join to add to this, but I know that the Grants Policy Statement does outline the items that are required to be documented within the written consortium agreement, so outlining clearly what the responsibilities and expectations are within that written agreement is really the crucial first step. In terms of additional guidance, I'm not sure if there's anything more that I can add specifically on that piece.

Megan Columbus: Okay.

Michelle Bulls: The only thing I'd like to add, Kasima and Megan, is that when they are negotiating their written agreements, that it's clear in the written agreement that they have 90 days, right? So, if they don't -- they need to back that time up to make sure that they don't hit those 120 days, because it will put the recipients in a noncompliance status. So, they need to work very closely to getting those last bit of invoices in, and the progress reports, and all of those things that they have to submit directly to their recipient, or to the prime, so the prime is not in a position where they're late submitting those final reports.

Megan Columbus: Great. And that actually answers another couple of questions that are here, so thank you so much, Michelle.

Okay, this attendee is a 12-month no-cost extension period. Do we need to request prior approval to carry over funds from the last budget period into the no-cost extension period, or is that automatic since the no-cost extension's not a new budget period, but rather an extension to the last budget period?

Kasima Garst: So that's a great question. And the answer is, it depends a little bit on what the award's carryover authority is. So, refer to your Notice of Award for that term and condition specifically. So, for example, if an award has the carryover authority indicates as Yes, then they may not be required to request that prior approval for any carryover of prior year funds, for example, unless otherwise, funds have been restricted in the Notice of Award. If the award does not have carryover authority, then you would need to request that prior approval from the Grants Management Specialist, in order to have the authorization and approval to utilize the funds. I think as Alan had mentioned, there's no -- in the case of a no-cost extension, there isn't a carrying over of funds from one PMS subaccount to another, but rather it's that authorization to use the funds.

Megan Columbus: Okay, thank you. Are recipients of training grants, like G-11s, able to request no-cost extensions before the grants end as well?

Kasima Garst: That would be dependent on the terms of the award. But in general, they are allowed to request a no-cost extension. So, I would refer to your terms and conditions and speak with your Grants Management Specialist.

Megan Columbus: Great, okay. A few people are asking, what if I don't see the link that I'm supposed to be seeing? I'm assuming they should be calling the eRA Service Desk if that's the case?

Kasima Garst: Yes, that's correct. And as I mentioned, there could be, especially because I think I've seen some of those questions being related specifically to the RPPR. So again, the Interim RPPR is available in the Common Status section of the Commons module, and then the Final RPPR would be within that Closeout section of the eRA Commons. So, depending on timing, you may see that link in one place or the other. But in general, if you have any technical issues with accessing those links, contact the eRA Service Desk.

Megan Columbus: Okay, here's a little bit of a sticky question, but I bet other people end up in the same situation, so I'm going to throw it out there. I have a question regarding a unilateral closeout. We have a situation where the principal investigator on the award left our institution and did not submit the RPPR. There's no other possible way for us to submit the report. We have tried all possible resources. We're sure the work was completed, but we don't have the necessary details. We have no contact -- we can't contact the PI. Have we ever seen this situation before? What do they do? Who do they contact?

Kasima Garst: So generally, if it's a technical issue with being able to complete those reports, we have asked that an eRA Service Desk ticket be submitted, and then typically they will reach out to my team in the Systems Policy branch to work on a resolution that will still comply with those requirements. Given that we're in this webinar, you're certainly welcome to reach out to that Systems Policy inbox on the Contact Slide, and we can help you figure out the best way for it that may be specific to your situation.

Megan Columbus: All right. I'm afraid that we still have more questions, but we don't have more time. I have to say I appreciate so much, Kasima and Alan, and Michelle on the back end helping answer these questions. I do encourage people to go look carefully at the Grants Policy Statement, look carefully at our page on grants closeouts. You've got lots of resources here to get those questions answered. This recording, we are absolutely going to make available. It takes a little while for it to become available, so look for it in seven to ten business days. And with that, I really appreciate your interaction. I love all these emojis, it makes us feel like we're not alone here. And you're going to get a survey at the end of this; let us know how we did so we can do better in the future, or we can keep doing more of the same. Also, let us know other topics that are really of interest to you, because we want to hear what would be most helpful so that you guys can get your jobs done easier. All right?

Thank you so much for joining us!