# Grant Program Closeout

Version 1.0

Broadband Infrastructure Program (BIP); Connecting Minority Communities (CMC) Pilot Program



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## Policy Disclaimer

This document is intended solely to assist recipients in better understanding the Broadband Infrastructure Program (BIP) and the Connecting Minority Communities Pilot Program (CMC) and the requirements set forth in the Notices of Funding Opportunity (NOFOs) for these programs. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific application requirements set forth in the NOFOs. In all cases, statutory and regulatory mandates, and the requirements set forth in the NOFOs, shall prevail over any inconsistencies contained in this document.

# Closeout Overview

#### Closeout Overview



What is closeout?

The process by which the National Telecommunications and Information Administration (NTIA) and the National Institute of Standards and Technology (NIST) determine that a grant recipient has completed all administrative, financial, and programmatic requirements of their award.



How long is closeout?

The closeout period is 120 calendar days after the end of a grant recipient's Period of Performance (PoP).



What happens during closeout?

Grant recipients verify completion of all Specific and Standard Award Conditions (SACs) and submit all Federallymandated final documentation.

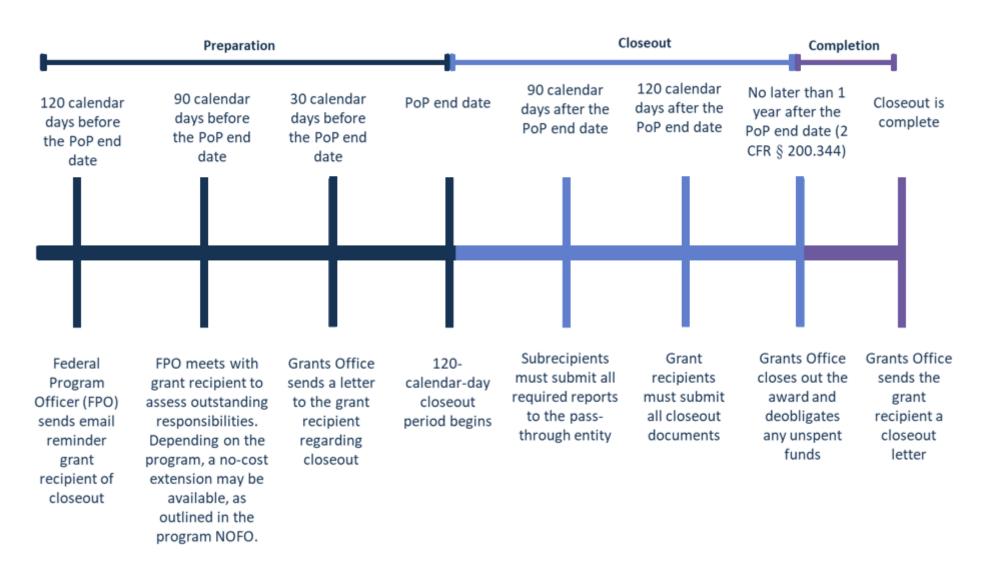


What do subrecipients have to do during closeout?

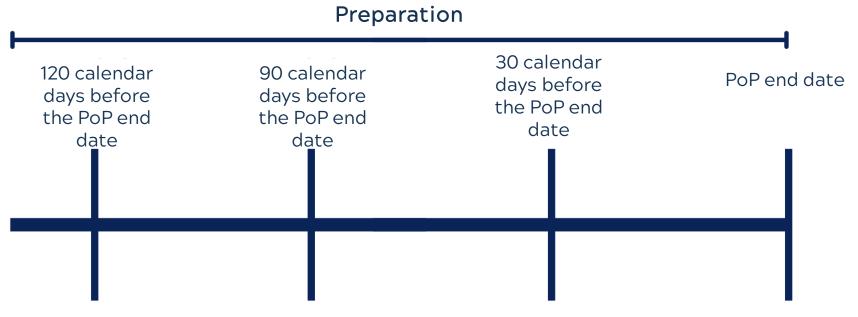
Subrecipients must submit all closeout reports to the pass-through entity (grant recipient) no later than 90 calendar days after the PoP end date.

# Closeout Timeline

#### Closeout Timeline



### Closeout Timeline: Preparation



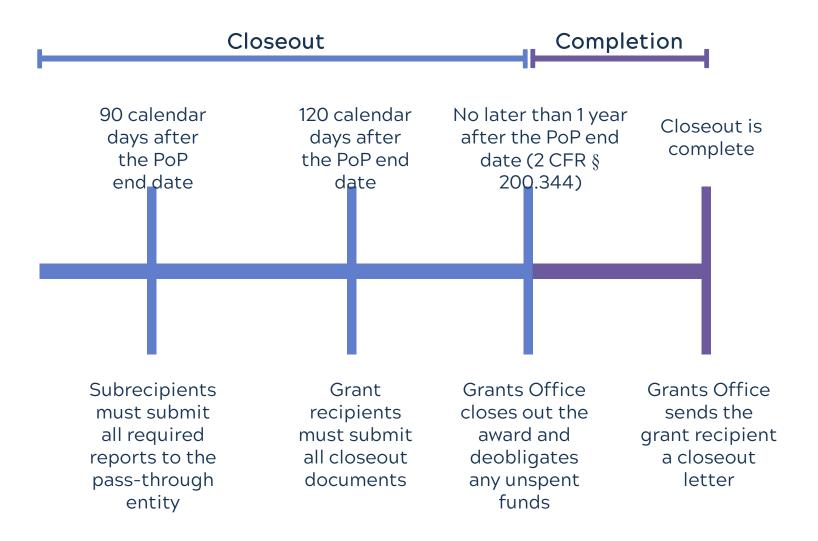
Federal Program
Officer (FPO)
sends email
reminder grant
recipient of
closeout

FPO meets with grant recipient to assess outstanding responsibilities. Depending on the program, a no-cost extension may be available, as outlined in the program NOFO.

Grants Office sends a letter to the grant recipient regarding closeout

120-calendarday closeout period begins

## Closeout Timeline: Closeout & Completion



# Requesting an Extension to the Closeout Period

Grant recipients can request an extension to the 120-calendar-day closeout period. All closeout extensions must be approved by the Grants Office.

Grants Office	How do I request an extension to my closeout period?	How do I know if I received an extension?
NIST	A grant recipient's Authorized Organizational Representative (AOR) may request an extension to the closeout period by <b>submitting an extension request to closeout@nist.gov</b> , with justification included.	The NIST Financial Assistance Agreements Management Office (FAAMO) will send the grant recipient an approval via email.

Per <u>2 CFR § 200.344(a)</u>, the Federal awarding agency or pass-through entity may approve extensions when requested and justified by the non-Federal entity, as applicable. Per <u>2 CFR § 200.344(b)</u>, a non-Federal entity must liquidate all financial obligations incurred under the Federal award no later than 120 calendar days after the end date of the PoP, unless an extension is approved by the Grants Officer. Please also reference the <u>Department of Commerce (DOC) Financial Assistance Standard Terms and Conditions</u> for additional closeout guidance.



# Grant Recipient's Role in Preparing for Closeout







After discussing any outstanding responsibilities with the assigned Federal Program Officer (FPO), recipients submit all final grant documentation and verify that all award conditions have been satisfied.

Complete final drawdowns for payment of final invoices and conducted activities within the PoP. Per Department of

Commerce (DOC) Financial Assistance

Standard Terms and Conditions, NTIA only authorizes reasonable, necessary, allowable and allocable administrative award closeout costs during the 120-calendar-day closeout period.

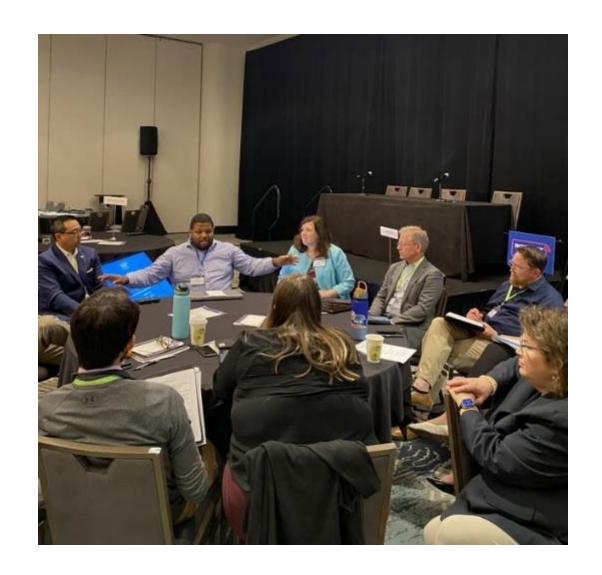
Ensure that all project activities
will be completed by the PoP end
date.

Federal closeout guidance can be found in the <u>DOC Financial Assistance Standard Terms and Conditions</u>, Federal regulation <u>2 CFR § 200.344</u> and <u>2 CFR § 200.345</u>, and within the SACs located within the grant recipient's award file.

# Early Closeout

## Early Closeout

- Grant recipients must first discuss early closeout with their FPO and Grants Specialist (GS). Grant recipients must also complete all project goals prior to their PoP end date to request an early closeout.
- If all parties (FPO and GS) agree that early closeout is appropriate, grant recipients must submit an early closeout request to <u>UGAM@nist.gov</u> via email, with the assigned FPO cc'd.





# Closeout Requirements

## Closeout Requirements



Refund any unobligated cash balances



Submit all final financial and performance reports



Liquidate all financial obligations



Account for all real and personal property

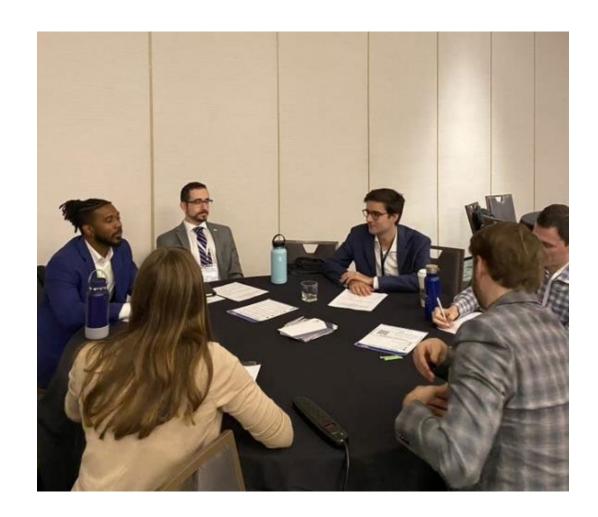
Federal closeout guidance can be found in the <u>DOC Financial Assistance Standard Terms and Conditions</u>, Federal regulation <u>2 CFR § 200.344</u> and <u>2 CFR § 200.345</u>, and within the SACs located within the grant recipient's award file.



# Billing and Deobligation

## Billing and Deobligation

- On most occasions, NTIA limits closeout activities to the preparation of final performance, financial, and required project audit reports, unless otherwise approved in writing by the Grants Officer (GO).
- NTIA only authorizes reasonable, necessary, allowable, and allocable administrative award closeout costs (accounting, reporting, etc.) during the 120-calendar-day closeout period.
- Programmatic costs, such as program work conducted, may not be incurred or charged to the grant during the closeout period as work must be completed by the end of the PoP.



## Deobligation

1st Final Drawdown

Grant recipients should make their final drawdown through Automated
Standard Application for Payment (ASAP) as soon as possible to allow for more time to complete the final closeout reports.

2nd Deobligation

The Grants Office will deobligate any remaining funds and close out the award after the final reports are submitted. Once the funds are deobligated, they will not be legally available for incurring new obligations.

3rd Closeout

Once the closeout process is complete, the Grants Office will send the grant recipient a closeout letter. No further transactions will be permitted, and no reports may be submitted or replaced.

# Closeout Documentation

## Required Documentation

CLOSEOUT DOCUMENTATION	REQUIRED FOR:
Final Performance (Technical) Report	All grant recipients
Final Federal Financial Report (FFR) (or SF-425)*	All grant recipients
Form SF-428 (Tangible Personal Property Report)*	All grant recipients
Form SF-428-B (Tangible Personal Property Report Final Report)*	All grant recipients
Form SF-428-S (Tangible Personal Property Report Supplemental Sheet)*	Grant recipients with residual inventory of equipment/supplies of \$5,000 or greater must report
Form SF-429 (Real Property Status Report)*	Grant recipients that purchased or improved real property with grant funds

<sup>\*</sup> Grant recipients must use the most up-to-date versions of these forms which can be found on <u>Grants.gov</u>.



#### Closeout Report Submission

- Email the closeout report(s) to <u>closeout@nist.gov</u> with the assigned FPO copied (cc'd).
- The email subject line **must** include the following:
  - Grant Recipient Name
  - Award Number
  - Report Name
- Attach the report(s) to the email.
- If the report requires a signature, it **must** be signed before the report is submitted. If the grant recipient is unable to sign a report that utilizes an Excel template, submit a signed PDF version in addition to the unsigned Excel version.
- NIST recommends sending **all** final closeout reports as attachments in one submission email, if possible.

# Performance and Federal Financial Reports

### Final Performance (Technical) Report

- Grant recipients must submit a final Performance (Technical) Report that is <u>cumulative</u> of the entire PoP.
- Grant recipients may submit a final Performance (Technical) report in lieu of an interim
  Performance (Technical) Report due at the end of the PoP.
- Grant recipients must:
  - Use the same template as previous semi-annual Performance (Technical) Reports.
  - Indicate that this is the <u>final</u> Performance (Technical) Report by checking the "Yes" box in the General Information section

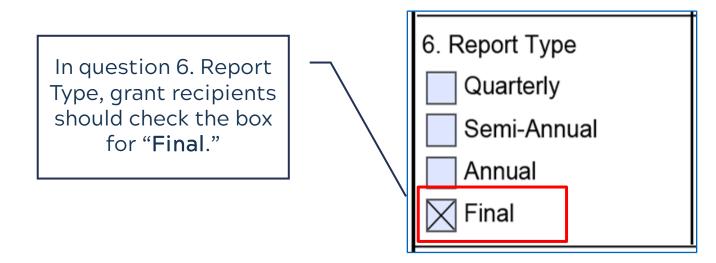
OMB Control No. 0660-0048 Expiration Date: 07/31/2025

	CONNECTING MINORITY COMMUNITIES PILOT PROGRAM PERFORMANCE (TECHNICAL) REPORT			
GENERAL INFORMATION				
GENERAL	Recipient Organization:	Award Identification Number:		
	Recipient Street Address:	Report Submission Date (MM/DD/YYYY):		
	City, State, Zip Code:	Final Banest	Yes 🗌	
	DUNS/UEI Number:	Final Report	No 🗆	
	Period of Performance Start Date (MM/DD/YYYY):	Period of Performance End Date (MM/DD/YYYY):		
	Report Period Start Date (MM/DD/YYYY):	Report Period End Date (MM/DD/YYYY):		



# Final Federal Financial Report (FFR) (or SF-425)

- Grant recipients must submit a final FFR that is <u>cumulative</u> of the entire PoP.
  - A grant recipient may submit a final (cumulative) FFR (or SF-425) covering the entire award period, in lieu of an interim FFR (or SF-425) due at the end of the PoP.
  - The final FFR (or SF-425) should include all financial transactions that occurred during the life of the award, including any closeout costs.
- Complete the final FFR (or SF-425) utilizing the SF-425 form linked at Grants.gov and submit the form to closeout@nist.gov, following NIST submission protocols.



# Tangible Property Overview

## Tangible Property - Key Terms

#### **SUPPLIES**

All tangible personal property other than those described in the definition of equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-Federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life (see 2 CFR § 200.314).

#### **EQUIPMENT** (unit cost ≥ \$5,000)<sup>1</sup>

Tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000 (see 2 CFR § 200.313).

[1] If a grant recipient has established a lower capitalization level for equipment or supplies, they will need to follow the lower amount and their organization policy for management requirements.

# Tangible Property - Residual Inventory and Post-Closeout Use

	SUPPLIES	<b>EQUIPMENT</b> (unit cost ≥ \$5,000) <sup>1</sup>
Post-Closeout Use	For unused supplies valued at \$5,000 or less in the aggregate:  • A reasonable amount of undeployed supplies may be retained to support the maintenance of the grantfunded project or program. The use of grant-funded supplies beyond these limited parameters may be subject to disposition (see 2 CFR § 200.314).	<ul> <li>Grant recipients may continue to use grant-funded equipment for the purpose of their award throughout the useful life of the property, as long as it is used to support the grant-funded project or program.</li> <li>Grant-funded equipment may also be disposed of in a manner outlined in <u>2 CFR § 200.313</u>.</li> </ul>
Residual Inventory	For unused supplies valued over \$5,000 in the aggregate (2 CFR § 200.314):  1. Use the supplies on another Federal award, 2. Dispose of those supplies and compensate NTIA, or 3. Retain the supplies for other activities and compensate NTIA.  There are no reporting requirements for supplies valued under \$5,000 in aggregate.	<ul> <li>In accordance with <u>2 CFR § 200.313</u>, when original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, the non-Federal entity must request disposition instructions from the Federal awarding agency.</li> </ul>

[1] If a grant recipient has established a lower capitalization level for equipment or supplies, they will need to follow the lower amount and their organization policy for management requirements.

# Tangible Property Reports

# Report SF-428 (Tangible Personal Property Report)

Form SF-428 collects information related to tangible personal property (equipment and supplies). The form consists of the cover sheet (SF-428) and attachments, to be completed as needed.

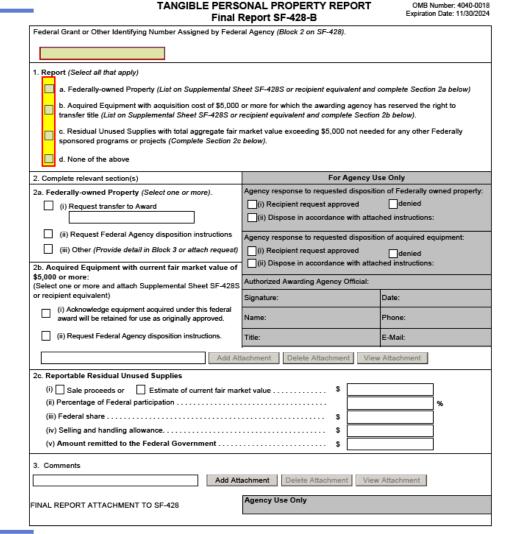
All grant recipients with NIST as their grants office are required to submit the SF-428.

#### TANGIBLE PERSONAL PROPERTY REPORT OMB Number: 4040-0018 Expiration Date: 11/30/2024 SF- 428 Federal Agency and Organizational Element to Which Report is Submitted 2. Federal Grant or Other Identifying Number Assigned by 3a. UEI 3b. EIN Federal Agency 4. Recipient Organization (Name and complete address including zip code) Recipient Organization Name: Street2: City: State: Province ZIP / Postal Code: Country: USA: UNITED STATES 5. Recipient Account or Identifying Number Attachment (Check applicable) 7. Supplemental Sheet Yes Annual Report (SF-428-A) No Final (Award Closeout) Report (SF-428-B) Disposition Report/Request (SF-428-C) Comments Add Attachment Delete Attachment View Attachment 9a. Typed or Printed Name and Title of Authorized Certifying Official First Name: Middle Name: 9b. Signature of Authorized Certifying Official 9c. Telephone (area code, number, extension) 9d. E-Mail Address 9e. Date report submitted (MM/DD/YYYY) 10. Agency use only

Report SF-428-B (Tangible Personal Property Final Report)

Form SF-428-B allows grant recipients to request specific disposition of Federally owned property and acquired equipment.

NIST requires that the SF-428-B be completed by all grant recipients. Grant recipients that did not use project funds to purchase equipment, or that do not have residual unused supplies/equipment with a total aggregate value of more than \$5,000 will mark "None of the above (1d)."

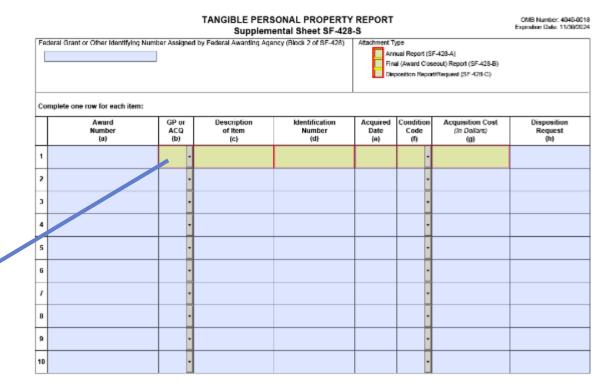


# Report SF-428-S (Tangible Personal Property Report Supplemental Sheet)

Form SF-428-S provides detailed individual item information in connection with required reports of tangible personal property.

The SF-428-S must be completed by grant recipients with a residual inventory of equipment or unused supplies exceeding \$5,000 in total aggregate value.

Please note that, under section 2b. option (i), "Request unconditional transfer of title with no further obligation to the Federal Government" is NOT an allowable option. This is an error on the form.



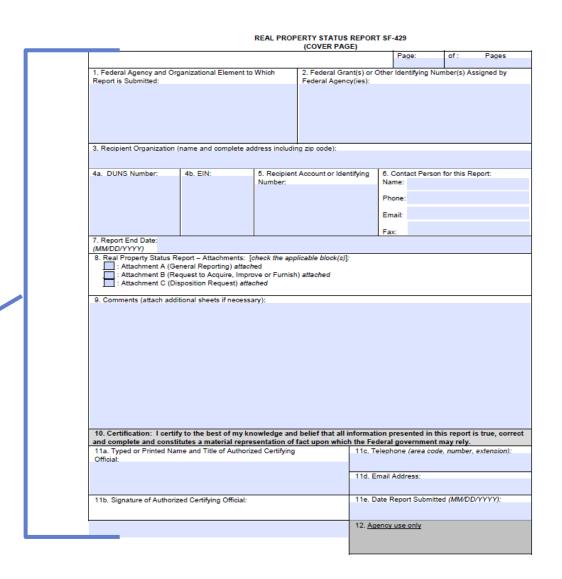
# Real Property Reports

## Report SF-429 (Real Property Report)

Form SF-429 is used by grant recipients of Federal financial assistance to report real property status or to request agency instructions on real property that was/will be provided as Government Furnished Property (GFP) or acquired (i.e., purchased or constructed) in whole or in part under a Federal financial assistance award.

Examples of real property may include land, cell towers and structures, and used fiber.

All grant recipients that purchased or improved real property with Federal funds must submit the SF-429.



# Grant Recipient Noncompliance

# Grant Recipient Noncompliance in Closeout

If the grant recipient fails to complete closeout requirements, including submitting all final, requested reports, the following steps will be taken:

1st Official Notice

2nd

Incomplete Closeout

3rd

Material Failure to Comply

4th

Future Consequences

The grant recipient receives a request from the Grants Office or Program Office for any missing reports and/or open corrective actions not submitted within the 120-day period.

NTIA and the Grants Office proceed to close out the award with the limited information available. If the requested final reports are not submitted to the Grants Office, this constitutes the grant recipient's material failure to comply.

Failure to comply with the award closeout requirements may have a negative impact on future funding from the DOC and other federal agencies (2 CFR § 200.344(i)).

### Open Corrective Actions at Closeout

- A corrective action is an action the grant recipient is required to take to correct a finding of noncompliance as specified in an official notice from the program office.
- All open corrective actions must be resolved before NTIA and the Grants Office close the grant award.
- Open corrective actions do not alone mean that the grant recipient cannot apply for or receive future Federal funding from NTIA. However, if a material noncompliance issue is unresolved, grant recipients may be subject to the terms of <u>2 CFR § 200.339</u>, which may include withholding further Federal awards for the project or program.

# Record Retention

#### Record Retention



Grant recipients must retain all Federal award records for a period of three years, starting the day the grant recipient submits their final financial report (see 2 CFR § 200.334). Supporting documentation, financial records, and other documents may be subject to future review.



Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained.



In cases where litigation, claims, or audits are initiated prior to the expiration of the three-year period, records must be retained until completion of the action and resolution of any issues associated with it or the end of the three-year retention period, whichever is later.

#### Record Retention - Continued

The documentation grant recipients are advised to retain after closeout includes, but may not be limited to:

RECORD RETENTION DOCUMENTS	
Award Package	Final closeout letter
Financial Records	Record of reconciliation
Evidence of program accomplishments	Property disposition forms
Written determinations and preapprovals between NTIA/Grants Office and grant recipient	Programmatic Reports: Baseline, Performance (Technical), and Annual
Records supporting all costs charged to the award	Audit follow-up records
Procurement records	Monitoring records
Subawards issued by the grant recipient and all documentation supporting the management and oversight of the subawards	



# Resources

#### Closeout Terms and Definitions

TERM	DEFINITION
Award Closeout Documents Due Date	The award closeout documents are due within 120 calendar days after the PoP end date.
Closeout Letter	The letter from the Grants Office to the grant recipient confirming the award has been closed.
Closeout Period	The 120-calendar-day window, which begins immediately following the PoP end date, during which the grant recipient must submit all required documentation, perform any final financial accounting of the award, and receive final review by NTIA and the Grants Office.
PoP End Date	The last day of the grant recipient's award period as modified by the most recent award amendment (CD-451) or the original CD-450.

#### Additional Closeout Resources

RESOURCE	
2 CFR Part 200.344 Closeout	Federal Regulations outlining closeout protocols.
Standard and Specific Award Conditions (SACs)	Requirements, regulations, and legislation specifically applicable to a grant recipient's award. SACs can be found in the grant recipient's award file.
DOC Financial Assistance Standard Terms and Conditions (dated November 12, 2020)	Standard terms and conditions (ST&Cs) applicable to all DOC financial assistance award.
BroadbandUSA Technical Assistance Hub	Online resource hub that provides Technical Assistance for BroadbandUSA programs under NTIA.









# Thank You

Broadband Infrastructure Program (BIP):  $\underline{bbinfra@ntia.gov}$ 

Connecting Minority Communities (CMC) Pilot Program: <a href="mailto:cmc@ntia.gov">cmc@ntia.gov</a>

