



SPONSORED PROJECT CLOSEOUT PROCEDURES

PURPOSE:

CSUSM Corporation Office of Sponsored Projects (OSP) has established these procedures to ensure timely closeout of sponsored projects including the submission of all sponsored required deliverables in accordance with the requirements of each sponsoring agency and in accordance with Office of Management and Budget (OMB) Uniform Guidance or 2 CFR 200 (UG) requirements and ICSUAM policy number 11003.11 – Project Closeout.

SCOPE:

These procedures are applicable to all CSUSM University faculty/staff involved in processing the closeout out a CSUSM Corporation sponsored fund and/or project.

PROCEDURE:

Federal regulation 2 CFR 200.16 defines closeout as the process by which the federal awarding agency or pass-through entity determines that all applicable administrative actions and all required work of the federal award have been completed and takes actions as described in the regulations set forth in 2 CFR 200.343. OSP will close out awards within the required timeframe, which is usually no later than 90 calendar days after the end date of the award, unless the funder authorizes an extension. For awards with non-federal funding sources, OSP will follow the closeout requirements as outlined in the award agreement.

In cases where the federal agency or non-federal funder considers the award to be closed and all obligations of the project to be met, but OSP has not received payment on the final submitted invoice, the award will be considered closed programmatically. OSP will provide all funder required financial documents to close out the agreement within the required timeframe. Internally, OSP may keep the project open past this date to ensure final receipt of funder payments and processing of the closeout requirements.

ROLES AND RESPONSIBILITIES:

Principal Investigators/Project Directors (PI/PD's) and OSP have a shared responsibility in facilitating award management and monitoring internal controls during an award's lifecycle. This section outlines the role of each individual or group for the successful management and closure of a sponsored project.

PI/PDs have overall responsibility for the programmatic objectives of the research. In addition, PI/PDs are responsible for complying with sponsors' terms and regulations and for meeting all deliverables – scientific, financial, and administrative. PI/PD's are responsible for managing an award and meeting deliverables. PI/PDs are also responsible for communicating issues to OSP throughout the award so that award terms and deliverables can be met or, if necessary, be modified. PI/PDs should keep OSP informed of any interactions with the sponsor that may impact the terms or deliverables of the award. PI/PDs should perform regular reviews of award expenditures and financial positions with their assigned Sponsored Projects Analyst in OSP and, as part of that review, discuss budget to actual variances, review allowability of charges and ensure expenditures are fully represented (complete). Lastly, PI/PDs are responsible for the timely submission of non-financial reports to sponsors, i.e. scientific, technical, invention, publications and/or patent reports.

OSP collaborates with the PI/PD to meet the financial terms and financial deliverables of federal and non-federal awards. This includes (1) monitoring award expenditures for compliance with sponsor guidelines or regulations, (2) cash management for awards, including interim and final invoicing, letter of credit draws, and agency reporting, and (3) reporting interim and final financial results of the award via a financial report to sponsors and closing out the award, and (4) closing out funds and/or projects in the system of record. These primary responsibilities are

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accomplished through ongoing engagement with the PI/PD and department/college, and staff. In conjunction with these duties, OSP maintains institutional records and documentation to support closeout.

RECORD RETENTION:

The record retention period shall be either three (3) years after the final financial report and/or invoice date or per the sponsor's guideline requirement; whichever period is longer.

DEFINITIONS:

Closeout means the process by which the awarding agency or pass-through entity determines that all applicable administrative actions and all required work of the award have been completed and takes actions as described in §200.343 Closeout.

REFERENCES:

[CSUSM Corporation Policies and Procedures](#)

[CSUSM Corporation Cost Principles for Sponsored Projects Policy](#)

[Office of Management and Budget \(OMB\) Uniform Guidance 2 CFR 200](#)