Agenda

• Final Financial Deliverable
• ORA Portal Department Dashboard
• FY21-22 Fiscal Closing Deadlines
Final Financial Deliverable

Yoon Lee
Final Financial Deliverables: Overview

• Final financial deliverables are the final invoice or the final financial report that UCLA submit to the sponsor to conclude the total expenditure of the project and the unexpended balance if any.
  ◦ Department submits a closeout packet to EFM to confirm the total final expenses and the unexpended balance for the project to report to the sponsor.
  ◦ For more information about a closeout packet, visit EFM website “Closeout Packet” page.
  ◦ For procedure details including a flow chart, visit EFM website “Closeout Procedure” page.

• Due date to submit the final to the sponsor is included in the agreement and indicated in PAMS Financial Deliverable Page.
  ◦ Due date of closeout packet is derived based on the due date of the final to the sponsor.
  ◦ A closeout packet reminder is sent to the department 15 calendar days prior to the due date.
  ◦ A tailored closeout packet dashboard is on your PAMS worklist and a closeout packet due date is available in PAMS closeout tab.
    ◦ For the chart showing the closeout packet due dates in relation to the final due dates to the sponsor, visit EFM website “Closeout Deadlines” page.

• Late submission of the Final to the sponsor is a non-compliance and can be a reason for non-payment.
Final Financial Deliverables: Federal

- **Uniform Guidance: § 200.344 Closeout:** "If the non-Federal entity fails to complete the requirements, the Federal awarding agency or pass-through entity will proceed to close out the Federal award with the information available. ~"
  
  - (a) The recipient must submit the final financial report as required by the terms and conditions of the Federal award no later than 120 calendar days after the end date of the period of performance.
  
  - (b) Unless the Federal awarding agency or pass-through entity authorizes an extension, 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 period of performance as specified in the terms and conditions of the Federal award.

- **NIH Grant Policy Statement: 8.6 Closeout:** "NIH may initiate unilateral closeout if a recipient does not provide timely accurate closeout reports or does not respond timely to NIH requests to reconcile discrepancies in grant records. ~"
  
  - Recipients must submit a final Federal Financial Report (FFR) within 120 calendar days of the end of the period of performance (project period).
  
  - Final FFRs must indicate the exact balance of unobligated funds and may not reflect any unliquidated obligations.
  
  - There must be no discrepancies between the Federal share of expenditures reported on the final FFR and the net cash disbursements reported to PMS on the Transactions section of the FFR.
Final Financial Deliverables: Unliquidated Obligation

• Uniform Guidance (§ 200.1 Definitions) and NIHGPS (1.2 Definition of Terms) defines “Unliquidated Obligation” same.
  ◦ Unliquidated Financial obligation means, for financial reports prepared on a cash basis, financial obligations incurred by the non-Federal entity that have not been paid (liquidated). For reports prepared on an accrual expenditure basis, these are financial obligations incurred by the non-Federal entity for which an expenditure has not been recorded.

• What does this mean to UCLA?
  ◦ All project expenses should be recorded in General Ledger (GL) within the liquidation period.
    ◦ When there is an allowable and applicable expense incurred for the project period but not recorded in GL, it must be included in the closeout packet with adequate supporting documentation (For details of adequate supporting documents, refer to EFM website FAQ 2.8).
  ◦ UCLA must draw cash on Letter of Credit within the liquidation period. EFM concludes the final draw amount based on the expenditures in the final FFR.
Final Financial Deliverables: Late Submission

• Uniform Guidance: § 200.344 Closeout:
  ◦ (h) If the non-Federal entity does not submit all reports in accordance with this section and the terms and conditions of the Federal Award, the Federal awarding agency must proceed to close out with the information available within one year of the period of performance end date.
  ◦ (i) If the non-Federal entity does not submit all reports in accordance with this section within one year of the period of performance end date, the Federal awarding agency must report the non-Federal entity’s material failure to comply with the terms and conditions of the award with the OMB-designated integrity and performance system (currently FAPIIS). Federal awarding agencies may also pursue other enforcement actions per §200.339.

• NIH Grant Policy Statement: 8.6 Closeout
  ◦ ~ If a recipient does not submit all required closeout reports within a year of the period of performance end date, NIH must report the recipient's failure to comply with the terms and conditions of award in FAPIIS and initiate unilateral closeout. Failure to submit timely and accurate closeout documents may affect future funding to the organization. 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, withholding or further awards, suspension or termination.
Final Financial Deliverables: Late Submission

**NIH NOT-OD-21-102: Reminders of NIH Polices related to Closeout**

- Per the NIHGPS, recipients **must** submit timely, accurate grant expenditure reports, and reconcile cash transaction reports submitted to the PMS with expenditure reports submitted to NIH.
- Recipients **may request payments from PMS up to 120 days** past the period of performance end date to liquidate obligations incurred during the period of performance.
- PMS will **automatically reject** any request made **after 120 days** past the period of performance end date.

**NIH NOT-OD-21-149: Process for Requesting Drawdowns Outside of the Liquidation Period**

- Prior to submitting the payment request in PMS, **submit a prior approval request** to the IC Grants Management Specialist listed in the Notice of Award.
- The request must provide the PMS subaccount, NIH grant number, the amount of funds being requested, and a **justification for the late payment request**. The recipient must also **describe what action is being taken to preclude similar situations in the future**.
- The IC will review the request and if it is determined that the justification is adequate, will notify the recipient of the approval (Requests will be reviewed and considered on a case-by-case basis).
- Once approved, NIH will notify PMS of the approval. The recipient may submit the payment request in PMS.
Final Financial Deliverables: Late Submission

• What is happening now?
  ◦ Sponsors are enforcing requirements rigorously.
  ◦ When a closeout packet is not received by the deadline, EFM proceeds to prepare the final following the “Closeout Procedure”. The EFM final analysis is completed based on the expense in GL excluding questionable expenses that could have been justified with adequate explanation and supporting documentation.
  ◦ Department often requests a revision to the final financial deliverable to include more expenses.
  ◦ EFM submits a revised final financial deliverable following the “Revision Procedure”; however, this does not guarantee sponsor’s approval.
  ◦ Sponsor has been requesting in-dept explanations for late submission (late payment request).
  ◦ Expenses not included in the original final financial deliverable are at risk for non-payment.
  ◦ Submitting a closeout packet is essential to recover costs. Unrecovered costs are funded by the department unrestricted funding source and it is the loss to the University.
  ◦ Visit EFM website “Policies and Procedures” to find “Closeout Procedure” and “Revision Procedure”

• How can we ensure recovery of full project costs?
  ◦ Review and reconcile expenses on a monthly basis as required by UCLA Policy 910.
  ◦ Submit an accurate and complete closeout packet to EFM on time.
Final Financial Deliverables: Summary

Step 1
Department submits an accurate and complete closeout packet to EFM on time

Step 2
EFM Fund Management team submits the final financial deliverable to the sponsor

Step 3
EFM Cash Management team collects the payment (e.g. draw cash on letter of credit on time)

"Full cost recovery starts with monthly reconciliation and a closeout packet"
ORA Portal Department Dashboard

Yoon Lee
Department Dashboard


“Live demo”
Department Dashboard

- **Department Dashboard shows two charts:**
  - Total number of Closeout Packets due to EFM in the current fiscal year and their status
  - Total number of Financial Deliverables due to the sponsor in the current fiscal year and their status
  - Data is from Post Award Management System (PAMS)
You can search the closeout packet status by organization (department, division, school), by sponsor type, and/or by a period. The period is defaulted to the current fiscal year.

**Pie Chart:** For the period you select, you can see the total number of closeout packets due with their status.

**Stacked Bar Chart:** For the period you select, monthly statistics are available to see a trend.
Department Dashboard: Financial Deliverables

- You can search financial deliverable status by organization (department, division, school), by sponsor type, by deliverable type, and/or by a period. The period is defaulted to the current fiscal year.

- **Pie Chart**: For the period you select, you can see the total number of financial deliverables due to the sponsor with their status.
  - **Stacked Bar Chart**: For the period you select, monthly statistics are available to see a trend.
FY 2021-22 Fiscal Closing Deadlines

Katie Cadle
2021-2022 Fiscal Year End Close Overview

- **Business and Finance Solutions (BFS)** has announced the [Closing Schedule for 2021-2022 Fiscal Year End (FYE)](#).
  ◦ Detailed resources can be found on the BFS website.

- **EFM deadlines for campus to submit to EFM for review and processing** communicated by ORA News Announcement on 05/09/22.
  ◦ Email Subject: 2021-22 FYE Close - EFM Deadlines
What to do in May and continuing through FYE Close:

• Review the Fiscal Closing Letter and Schedule of Deadlines to identify deadlines applicable to your area.

• Conduct monthly reconciliation and ledger review:
  ◦ Verify expenses booked to the ledger have been recorded to the appropriate FAU
  ◦ Process cost transfers for adjustments, if needed
  ◦ Submit vendor and subcontractor invoices to Accounts Payable in a timely manner
  ◦ Contact vendors and subcontractors for invoices billing for goods and services rendered during FY21-22
### FYE Close – Department Deadline for Submission to EFM

<table>
<thead>
<tr>
<th>Description</th>
<th>Deadline to Submit to EFM for Review &amp; Processing</th>
<th>Deadline for EFM to Review, Approve, &amp; Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>Payroll (UCPath) Direct Retro Expense Transfer</td>
<td>06/29/22 @ 5:00 PM</td>
<td>07/05/22 @ 5:00 pm</td>
</tr>
<tr>
<td>PPS Payroll Cost Transfer Journal Request</td>
<td>06/29/22 @ 5:00 PM</td>
<td>07/14/22 @ 8:00 PM</td>
</tr>
<tr>
<td>Intercampus Transfers</td>
<td>07/01/22 @ 5:00 PM</td>
<td>07/14/22 @ 8:00 PM</td>
</tr>
<tr>
<td>NPEAR Non-Payroll Expense Adjustments</td>
<td>07/05/22 @ 5:00 PM</td>
<td>07/14/22 @ 8:00 PM</td>
</tr>
<tr>
<td>Accrual/Deferral Forms and Supporting Documents</td>
<td>07/07/22 @ 10:00 AM</td>
<td>07/14/22 @ 8:00 PM</td>
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</tbody>
</table>

- Review and Approval of Cost Transfers submitted after the deadlines above **cannot be guaranteed** by EFM.
- Expense transfers not reviewed due to late submission will be reviewed and processed for FY 2022-23.
Fiscal Year End Accruals & Deferrals

• When accruals/deferrals are required & why it matters:
  ◦ The Governmental Accounting Standards Board (GASB) requires the UC/UCLA financial statements to be prepared on an “accrual basis” where expenses incurred in a fiscal year are recorded to the year which goods and services were rendered.

• Due 6/03/22: Department submits Reimbursement Requests and Vendor Invoices to Accounts Payable to be recorded as part of FY 2021-22 Expenses.

• Due 7/01/22: AP will complete review and posting of FY 2021-22 expenses.

• Due 7/07/22: If AP deadline is missed, Department submits an Accrual/Deferral Request to EFM at 10:00 AM starting 7/02/22.
  ◦ Review the General Ledger starting 7/02/22 to confirm if the transaction was not recorded.
  ◦ Complete the accrual Form E
  ◦ Complete journal justification
  ◦ Submit supporting documentation to EFM at EFMOperations@research.ucla.edu

• Due 7/14/22: EFM will review Accrual/Deferral requests submitted starting 7/02/22 and post as appropriate, verifying that it has not been recorded by AP in GL to avoid duplicate entries.

• Accrual forms, justification template, and instructions are available on the BFS website.
Additional UCPath Deadlines

- **Funding Rollover Process:**
  - 6/24/22-6/30/22: UCPath runs E-064 Funding Rollover process in Production.
  - Do not perform any funding entries during this period.
  - More information on the Funding Rollover Process can be found on the [CRU Website](#).

- **ORA will update the Fund End Date in OASIS based on the following criteria:**

<table>
<thead>
<tr>
<th>Award Type</th>
<th>Fund End Date will be updated to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contract or Grant</td>
<td>Project End Date <em>(Budget End Date for MFNOA funds)</em></td>
</tr>
<tr>
<td>Subcontract or Subgrant</td>
<td>Estimated Period of Performance End Date <strong>OR</strong></td>
</tr>
<tr>
<td></td>
<td>Estimated Project End Date <em>(if no estimated Period of Performance End Date exists)</em></td>
</tr>
</tbody>
</table>

  - For funds with a pending No Cost Extension (NCE), the Fund End Date will be updated when the NCE is executed.

- **7/05/22 @5 PM – 07/08/22:** UCPath performs final direct retro run for FY 21-22.
Any Questions?

Contact Information

EFM Website
https://efm.research.ucla.edu

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