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# OFFICE OF CONTRACT & GRANT ADMINISTRATION UPDATES

AUGUST 8<sup>TH</sup>, 2024 RESEARCH ADMINISTRATION FORUM

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# OCGA UPDATE TOPICS

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# CLOSEOUTS

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# Reminder for NIH Closeout Reporting Requirements and Closeout Email Notifications

## Notice Number:

NOT-OD-24-047

## Key Dates

### Release Date:

December 21, 2023

## Related Announcements

- **November 30, 2017** - NIH Enforcement of Closeout Policies. See [NOT-OD-18-107](#)

## Issued by

NATIONAL INSTITUTES OF HEALTH (NIH)

## Purpose

This notice serves as a reminder for existing closeout reporting requirements and an update to reminder closeout email notifications to promote compliance in the area of timely closeout for our recipient community.

As a long-standing policy, NIH recipients must submit a Final Federal Financial Report (FFR), Final Research Performance Progress Report (F-RPPR), and Final Invention Statement and Certification (FIS) within 120 calendar days of the end of the period of performance (project period), as required in section 8.6 of the NIH Grants Policy Statement. The reports become overdue the day after the 120-calendar day period ends. It is the recipient's responsibility to accurately reconcile their FFRs that are submitted to the Payment Management System (PMS) and to ensure that all required closeout documents are submitted in a timely manner.

NIH currently sends reminder emails to recipients 10, 120, and 150 days after the project period end date. To increase outreach efforts to recipients prior to final reports becoming delinquent, starting in January 2024 NIH will begin to send an additional reminder closeout email notification 90 days after the project period end date. As with the 120- and 150-days reminders, recipients will only receive this notification if there is at least one required closeout report that has not been submitted as of the date of the notification.

# NIH Enforcement of Unilateral Closeout Reporting in the System for Award Management Responsibility/Qualification (formerly Federal Awardee Performance and Integrity Information System (FAPIIS))

**Notice Number:**  
NOT-OD-24-055

## Key Dates

**Release Date:**

January 23, 2024

## Purpose

The purpose of this Notice is to alert the NIH extramural community that NIH is strengthening enforcement of longstanding closeout requirements, outlined in the NIH Grants Policy Statement (NIH GPS) [Section 8.6](#), Closeout. NIH has consistently reminded recipients of their responsibility to submit timely, accurate final grant expenditure, progress and invention reports. In order to fulfill agency requirements under the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR 200, NIH will report all unilateral closeouts of NIH awards as a Responsibility/Qualification (formerly FAPIIS) record in the entity's information in the [System for Award Management \(SAM.gov\)](#). Please be reminded that, without prior approval from the awarding institute or center for a delay in closeout, NIH will initiate unilateral closeout for all awards that fail to meet closeout requirements within 120 days as required by [Section 8.6](#) of the NIH GPS. **See below for details.**

### NIH Actions

NIH is committed to addressing and reducing grant closeout delays and to enhance compliance with Federal regulations and NIH policies. Therefore, NIH will strictly enforce its closeout policies. When recipients fail to submit timely reports, NIH will initiate unilateral closeout. If a recipient does not submit all required closeout reports within a year of the period of performance end date, NIH will unilaterally close the award and report the recipient's failure to comply with the terms and conditions of award in SAM.gov. In addition, 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 of further awards, suspension or termination per [Section 8.5.2](#) of the NIH GPS.

### Effective Date

In an effort to comply with the regulations, NIH will report unilateral closeout actions in SAM.gov retroactively, beginning with all unilateral closeout actions taken since January 1, 2023.

# OCGA CLOSEOUT ESCALATION PROCESS

PAST DUE FINAL REPORT EMAIL ESCALATION				
	When	Sent by	To	cc'd
First Request	Day after due date of <b>final report</b> or within 2 days of assignment if not previously assigned.	Analyst	PI	Dept Fund Mgr Dept Closeout
Second Request	7 business days after first request	Analyst	PI	Dept Fund Mgr Dept Closeout
Third Request	7 business days after second request	Asst. Director	Chair	PI Dept. Fund Mgr Dept Closeout
Fourth Request	7 business days after third request	Sr. Director	Dean	Chair PI OCGA Asst. Director Dept Fund Mgr Dept Closeout
All Subsequent Requests	Every 5 business days	Sr. Director	Dean	VCR AVC ORA Chair PI OCGA Asst. Director Dept. Fund Mgr Dept. Closeout

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# NIH GRANT CLOSEOUT PROCESS: ADMINISTRATIVE AND FINANCIAL ESSENTIALS



SEPTEMBER 17, 2024

10:00 am



[REGISTER](#)



## AGENDA

- Closeout Requirements: An Overview of standard and financial closeout from both sides of the same coin!
- Administrative Requirements
- Financial Requirements

**CLOSING OUT AN NIH GRANT INVOLVES BOTH ADMINISTRATIVE AND FINANCIAL RESPONSIBILITIES TO ENSURE COMPLIANCE WITH NIH POLICIES. AMONG THESE ARE THE SUBMISSION OF THE FINAL PROGRESS REPORTS, INVENTION STATEMENTS, PROPERTY REPORTS, AND PREPARING THE FEDERAL FINANCIAL REPORT (FFR), AND MORE. MAINTAINING THOROUGH RECORDS AND DOCUMENTATION THROUGHOUT THE LIFE OF THE GRANT IS CRUCIAL FOR A SMOOTH CLOSEOUT PROCESS.**

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# 2024 REVISIONS TO 2 CFR

UNIFORM GUIDANCE

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# THRESHOLD FOR PROPOSALS

OMB Guidance for Federal Financial assistance released on April 22, 2024 goes lives on October 1, 2024.

## INCREASED THRESHOLD REQUIRE CHANGES TO APPROVED INDIRECT COST RATE (PER HHS)

Equipment Capitalization Threshold (\$5k up to \$10k) and / or MTDC for subawards (first \$25k to \$50k)

## UC POLICIES IN REVIEW

UC is in the process of reviewing current UC policies and working with our Federal negotiators on timelines for Indirect Cost Rate submissions

## CONTINUE TO USE CURRENT GUIDELINES

Until we receive UC confirmation to use the new thresholds

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# UPCOMING MONTHLY TRAINING

## OCGA Monthly Training Calendar

### AWARD PROCESSING

August 21, 2024

### COMPLETING THE EPASS

October 16, 2024

### S2S BASICS

September 18, 2024

### POST-SUBMISSION REQUIREMENTS

November 20, 2024

[Register for each session individually](#)

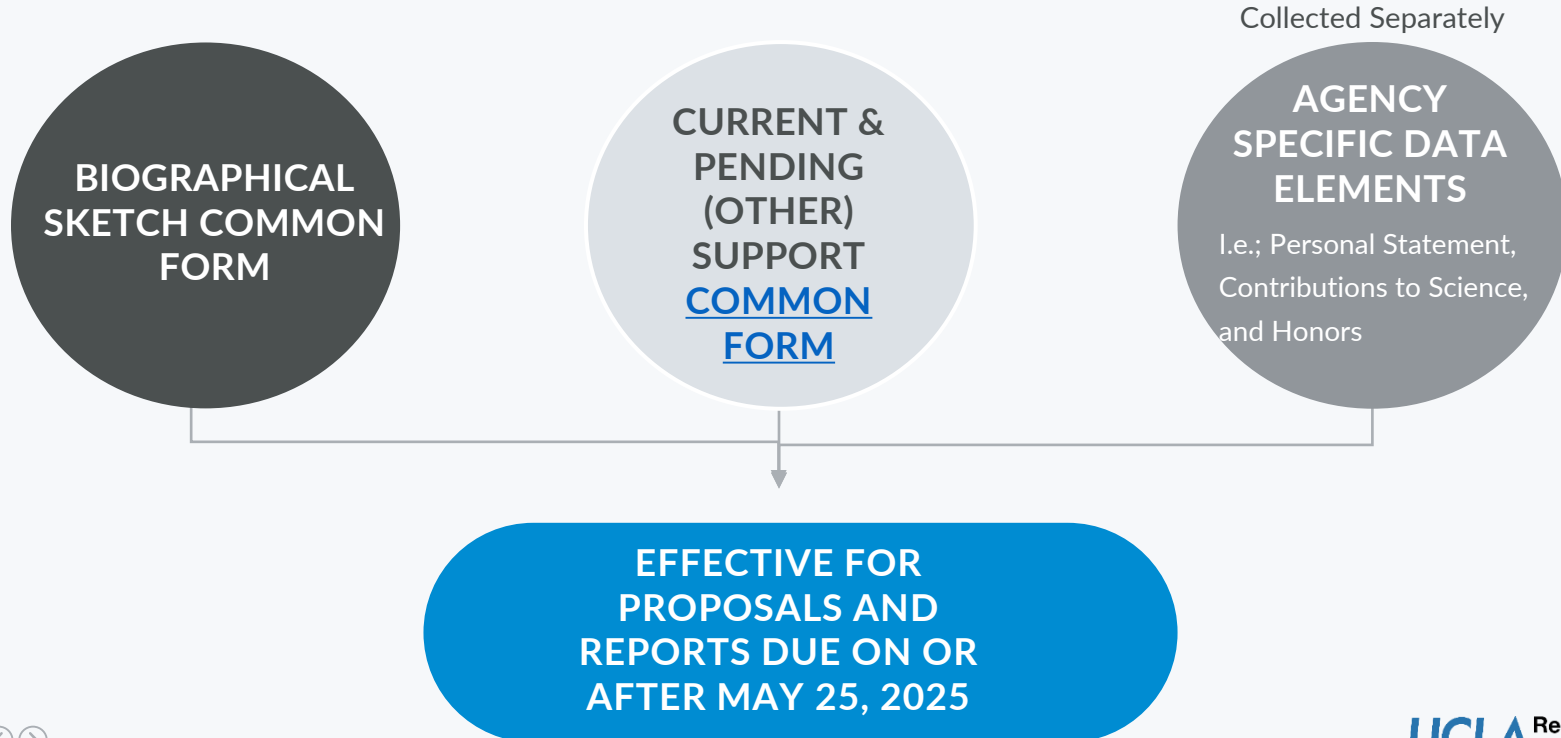


# **SPONSOR UPDATES**

**NIH COMMON FORMS IMPLEMENTATION**



# NIH: COMMON FORMS FOR BIOGRAPHICAL SKETCH AND CURRENT AND PENDING (OTHER) SUPPORT



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## NIH: COMMON FORMS FOR BIOGRAPHICAL SKETCH AND CURRENT AND PENDING (OTHER) SUPPORT

NIH will require:

- ✓ The use of Science Experts Network Curriculum Vitae ([SciENCv](#)) to complete Common Forms (i.e., Biographical Sketch, Current and Pending (Other) Support) and the NIH Biographical Sketch Supplement to produce digitally certified PDF(s) for use in application submission
- ✓ All Senior/Key Personnel to enter their ORCID ID into SciENCv in the Persistent Identifier (PID) section of the Common Forms.
- ✓ All Senior/Key Personnel to link their ORCID ID to their eRA Commons Personal Profile.
- ✓ For information on linking an ORCID ID to the eRA Commons Personal Profile see the [ORCID ID topic in the eRA Commons](#) online help.

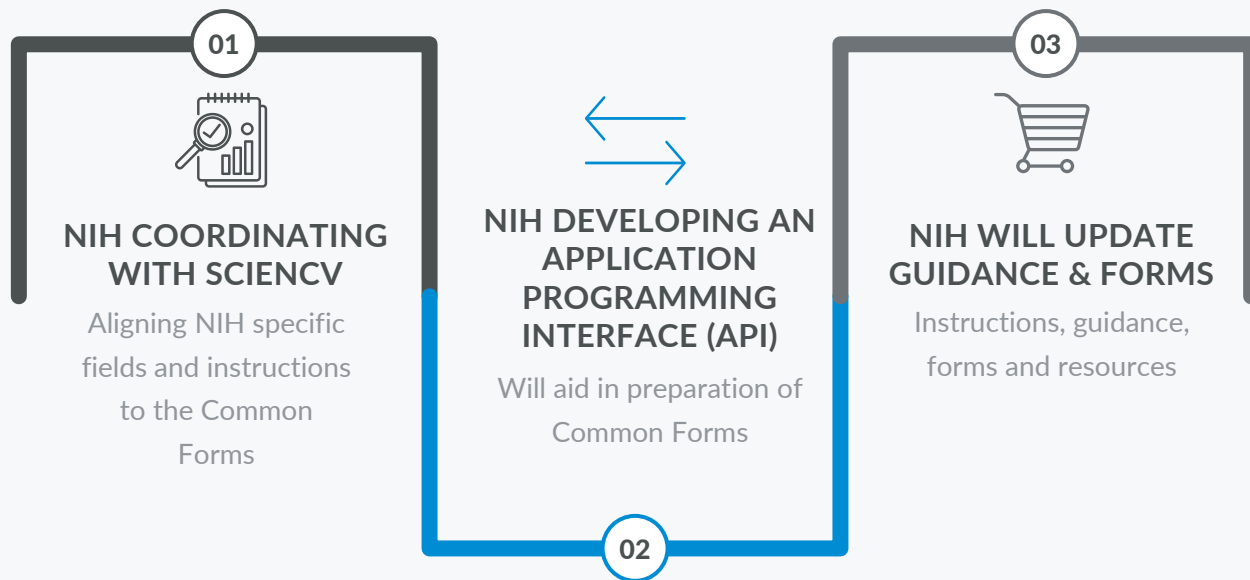
# NIH COMMON FORMS TIMELINE

If your intended application due date or RPPR submission is?	You must...
<p>On or before May 24, 2025, including:</p> <ul style="list-style-type: none"> <li>• Applications submitted for due dates on or before May 24, 2025.</li> <li>• Applications submitted under NIH Late Policy 2-week window of consideration for intended due dates on or before May 24, 2025.</li> <li>• Applications submitted by June 1, 2025, under NIH Continuous Submission Policy for the May 7, 2025, AIDS intended due date.</li> </ul>	<p>Continue using the current <a href="#">NIH Biosketch</a> and <a href="#">Other Support</a> format pages for applications, Just-in-Time (JIT) and RPPRs.</p>
<p>On or after May 25, 2025, including:</p> <ul style="list-style-type: none"> <li>• Applications submitted for due dates on or after May 25, 2025.</li> <li>• All application types (New, Resubmission, Renewal, Revision).</li> <li>• Applications submitted early for intended due dates on or after May 25, 2025.</li> </ul>	<p>Use the Common Forms (i.e., Biographical Sketch, Current and Pending (Other) Support) and NIH Biographical Sketch Supplement along with the updated instructions for applications, JIT and RPPRs.</p>

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# NIH: COMMON FORMS FOR BIOGRAPHICAL SKETCH AND CURRENT AND PENDING (OTHER) SUPPORT

[NOT-OD-24-163](#)



Look for additional guidance later this year



Questions About  
Today's Topics?