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POST AWARD ADMINISTRATION II

CALIFORNIA INSTITUTE OF TECHNOLOGY

We are in this together.....

ORA

Other units

Provost Office

ASIC OGC OTT

Division

Grad Office Int'l Offices

Finance

PI

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Financial Management of Sponsored Awards

- Contracts vs. grants & cooperative agreements
- Responsibilities of the PI
- Responsibilities of Project Accounting
- Expenditure categories and types
- Special award conditions
- Audits
- Award closeout

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Terms and Conditions….

T&Cs…

Award Terms

Institutional Policies

Sponsor Terms & Conditions

Federal Terms and Conditions
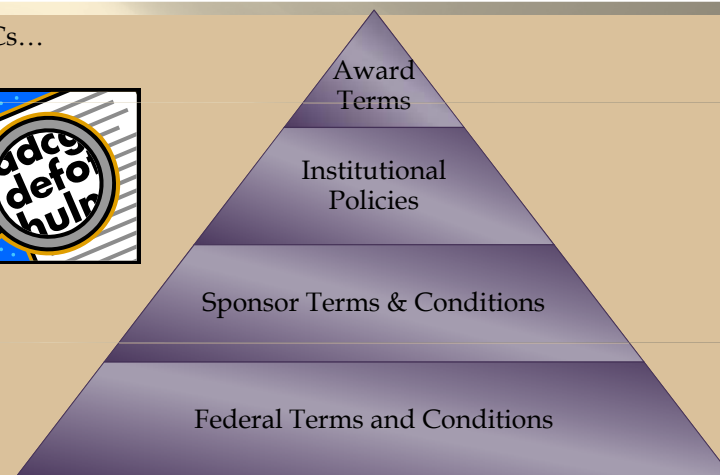
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Financial Compliance

- allowability
- allocability
- consistency
- reasonability

- questionable costs (food, foreign travel, honorarium)
- distribution of costs for related activities
- direct vs. indirect costs
- cost price analysis, prudent person rule

Referenced documents:
OMB Circular A-21 Cost Principles for Educational Institutions
OMB Circular A-110 Uniform Administrative Requirements for Grants and Other Agreements

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Contracts vs. Grants/Cooperative Agreements

CONTRACT	GRANT & COOPERATIVE AGREEMENT
- Acquisition (procurement) - SOW defined by the Gov - Intent to accomplish Gov purpose - Subject to federal cost principles (OMB A-21) - Terms based on FAR & other contract language	- Financial Assistance - PI develops research theme/goals - Intent to accomplish public purpose - Subject to federal cost principles (OMB A-21) - Terms based on federal cost principles in OMB A-110 and Grants Policy Statement.

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FAR vs. OMB Circular A-110

FAR

- Applicable to Federal Contracts

- Intent is to contain all the administrative requirements for all types of entities (commercial-educational, contractors vs. subcontractors)

- Full text of clause may be in contract or incorporated by reference

  FARSITE url:
  http://farsite.hill.af.mil/farsite_alt.html

OMB A-110

- Applicable to Federal Grants & Cooperative Agreements

- Contains all the administrative requirements, specifically for educational institutions

- Text is incorporated by reference into grant or cooperative agreement

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PI Responsibilities

- **The PI has the primary responsibility to:**

  Financially

  - Manage the research expenditures with diligence

  - Understand and adhere to all terms and conditions

  - Certify that:
    - Expenditures, including costs incurred by subawards, charged are appropriate and benefit the award
    - salary charged commensurate effort spent

  - Review expenditures posted to the award on a regular basis (recommend monthly review)

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PI Responsibilities

□ **The PI has the primary responsibility to:**

Programmatically

➢ Execute the project according to the scope of work
➢ Monitor progress of subawardees/collaborators
➢ Achieve research objectives
➢ Ensure compliance with all applicable rules, regulations and terms and conditions of the award, including those of the Institute
➢ Ensure compliance with technical report requirements

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Project Accounting Responsibilities

Project Accounting has primary responsibility to:

□ Review Caltech expenses for compliance with all sponsor and institutional policies
  ▪ approve and process cost transfers
□ Ensure compliance with special award conditions
□ Work with PI and OSR to obtain agency approvals
□ Invoice sponsors or request reimbursements via LC draws
□ Process payments to JPL
□ Submit financial reports and process financial closeout
□ Coordinate all external audits related to sponsored research (with the exception of audits involving indirect cost rate proposals)
□ Provide training to campus

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How it all starts

▫ OSR notifies PI when an award is received

▫ Division requests expenditure account (PTA)

▫ OSR activates PTA - appropriating approved budget and noting sponsor's terms & conditions

▫ PI starts spending from the PTA

  ▪ Charges salaries for self, researchers, student workers
  ▪ Purchases supplies, equipment
  ▪ Allocates funding for subawardees
  ▪ Attends project meetings, conferences
  ▪ Covers portion of graduate assistant's tuition

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Expenditure Categories

▫ Expenditure categories are major cost categories:

  ▪ Salaries, benefits, paid leave
  ▪ Student aid
  ▪ Stipends
  ▪ Materials and Supplies
  ▪ Subcontracts
  ▪ Travel
  ▪ Equipment
  ▪ Overhead or Indirect Cost
  ▪ Tuition Remission Allocation
    ▫ and many more…….

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Expenditure Types

- ▣ Expenditure types are more definitive cost types linked to expenditure categories:
  - Salaries may be: Bi-weekly salaries, professorial salaries, grad assistantships, student wages, etc.
  - Stipends may be: Post doctoral fellowship, participant support
  - Student aid includes: Grad fellowships, NTR grad fellowships
  - Materials & Supplies include: Supplies allocable, temp services, JPL exempt, food, hotel, parking, shipping, facilities, postage, etc.
  - Other internal charges: "WIC" charges processed by another Caltech department
    - ▫ Remember to set up TechMart PO for >$5K (equipment) purchases from Caltech Wired

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Expenditure Types-Salaries

EXPENDITURE TYPE	DEFINITION	Overhead *	Paid Leave	Staff Benefits	Tuition Remission
Bi-Weekly Admin Staff	Salaries for administrative staff (i.e., those who support the administrative activities of the Institute)	Yes	Yes	Yes	No
Bi-Weekly Technical Staff	Salaries for technical staff (i.e., those who support the technical activities of the Institute)	Yes	Yes	Yes	No
Bi-Weekly Research Staff	Salaries for research staff (i.e., those who support organized research projects)	Yes	Yes	Yes	No
Monthly Admin Staff	Salaries for administrative staff (i.e., those who support the administrative activities of the Institute)	Yes	No	Yes	No
Monthly Technical Staff	Salaries for technical staff (i.e., those who support the technical activities of the Institute)	Yes	No	Yes	No
Monthly Research Staff	Salaries for research staff (i.e., those who support organized research projects)	Yes	No	Yes	No
Monthly Staff	Salaries for staff (other than research and administrative staff)	Yes	No	Yes	No
Other Faculty Salaries	Monthly salaries for non-professorial faculty	Yes	No	Yes	No
Professorial Faculty	Monthly salaries for professorial faculty	Yes	No	Yes	No

* Modified Total Direct Cost Base

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Expenditure Types-Salaries/Stipends

Expenditure Type	Definition	Overhead	Paid leave	Staff Benefits	Tuition Remission
Postdoctoral Fellowship	Monthly stipends for postdoctoral fellows, recipients of NIH, NSF and NASA fellowship /training grants	No	No	Not in benefits pool	No
Postdoctoral Scholar Sal	Monthly salaries for post doctoral scholars working on research projects	Yes	No	Yes	No
Res/Postdoctoral Fellows	Monthly stipends paid to research/postdoctoral scholars	No	No	Not in benefits pool	No
Grad Assistantships	Monthly salaries for graduate research assistants for working on institutional research	Yes (on salary only)	No	No	Yes
Grad Fellowships	Stipends paid to graduate students under fellowships	No	No	No	Yes
NTR Grad Assistantships	Monthly salaries for graduate research assistants for working on institutional research	Yes	No	No	No
NTR Grad Fellowships	Stipends paid to graduate students under fellowships	No	No	No	No
Stipend-Participant Support UG	Used only for stipends paid to Undergraduate students on NSF-REU awards	Yes at 25%	No	No	No
Student Wages NB	Salaries for students who do not receive benefits under the work study program, includes SURF students	Yes	No	No	No

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Expenditure Types

- ▫ More examples of expenditure types
  - Subcontracts: 1st $25K
  - Subcontracts-over $25K
  - Genome Array costs: 1st $75K
  - Genome Array costs: over $75K
  - JPL Exempt
  - Travel: domestic, foreign
  - Equipment: Caltech owned, equipment-govt., or equipment-other owned
  - Relocation or moving costs
    - ▫ employee is essential to the project on a full time basis for a continuous period of at least 12 months

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Restricted Expenditure Types
under federal awards & some other sources -

- Administrative salaries and other F&A type expenses
- Food, bar and Athenaeum hotel charges
- Equipment
- Foreign travel
- Honoraria
- Participant support costs

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Administrative costs

- **C**onsistent Treatment-Direct vs. Indirect Cost
  - Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or as F&A costs
    - Costs that can be identified specifically with a particular sponsored project or can be assigned to such activities relatively easily are direct costs
    - Costs incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project are F&A costs
- Administrative salaries are normally charged as F&A costs, but may be acceptable if falls under OMB A-21 major project
- Project Accounting reviews administrative costs charged to federal projects

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Food and hotel

▣ Ask if food is entertainment

- Caltech business expense guidelines state that federal contract and grant funds may not be used to fund entertainment
- In case of a conflict between agency policy and Institute guidelines, more restrictive guidelines will apply
- Project Accounting will follow-up with divisions if food and hotel costs charged to federal awards

http://researchadministration.caltech.edu/documents/32-cit_business_expense_guidelines.pdf

http://researchadministration.caltech.edu/documents/33-cit_entertainment_guideline.pdf

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Equipment

▣ General Purpose Equipment (not allowed as direct cost)

- Equipment not limited to research, scientific or other technical activities
- Examples: office equipment and furnishings *(please don't try to buy a sofa)*, telephones, information technology equipment, printing equipment, etc.
- Unallowable as direct charges except where approved in advance by the sponsor

▣ Special Purpose Equipment (may be allowed as direct cost)

- Equipment limited to research, scientific or other technical activities
- University definition of equipment:
  - ▫ Stand-alone movable item, acquisition value of $5,000 or more AND useful life of at least one year (Note: JPL equipment threshold is $1,000)
- University-wide equipment tracking required if using Federal funds

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Participant Support Costs

- NSF research grants may include funds for participants or trainees attending meetings, conferences, symposia or training projects
- Allowable direct costs are stipends or subsistence allowances, travel allowances and registration fees paid to or on behalf of participants or trainees (not employees)
- NSF approval is required both to use funds for participant support, and to use such funds for other purposes

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Participant Support Costs

Expenditure type	Expenditure definition
Mtgs - Participant Support	(Materials & Supplies) Direct costs for registration or conference fees associated with meetings, conferences, symposia or training projects that are paid to, or on behalf of, participants or trainees who are not employees of the Institute
Travel - Participant Support	Direct costs for stipends, subsistence allowances and travel allowances associated with meetings, conferences, symposia or training projects that are paid to, or on behalf of, participants or trainees who are not employees of the Institute
Stipend Participant Support	Stipends paid under NSF grants that provide for participant support costs
Stipend Participant Support UG	Use only for stipends paid to undergraduate students on NSF- REU awards

- Why is it important to use the correct expenditure type? Because participant support costs are overhead free and are restricted by the sponsor
- Administrative costs such as room rental, copying, postage, and clerical services do not qualify as Participant Support costs.
- To rebudget funds from participant support cost category to another category requires Program Officer approval

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Travel-Domestic and Foreign

- ▫ Travel
  - ▪ Airfare in excess of lowest available rate is unallowable
    - ▫ Exceptions usually available if "lowest available" would result in traveling at unreasonable hours, excessively prolong the duration of travel, etc.
  - ▪ International travel
    - ▫ Often requires prior approval from sponsor
    - ▫ Federal funds: Fly America Act
  - ▪ Supporting documentation for travel:
    - ▫ Travel Expense Form
    - ▫ Trip receipts
    - ▫ Per Diem rates
    - http://procurement.caltech.edu/documents/purchasing/travelpolicy.pdf

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Special Award Conditions

- ▫ Special compliance monitoring
  - ▪ cost sharing
  - ▪ cost transfers
  - ▪ payroll distribution confirmation
- ▫ faculty effort monitoring
  - ▫ NIH salary cap compliance
  - ▫ NSF salary restrictions
  - ▪ JPL IA and Transfers
  - ▪ audits

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Cost sharing

Portion of project costs not borne by the sponsor

Types of cost sharing

- Mandatory (required by sponsor)
- Voluntary committed (PI proposed and sponsor awarded)
- Voluntary uncommitted (not mentioned in the proposal or award)

Mandatory and voluntary committed require tracking

- Set up cost sharing companion awards (ZOACS Awards)
- Set up NIH or other sponsor mandated salary cap companion awards

Caltech policy on cost sharing

OMB A-110, Subpart c-Post Award Requirements, .23 Cost Sharing

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Cost Sharing

Verifiable from recipients records

Not included as contributions for any other federal projects

Necessary and reasonable for proper and efficient accomplishment of project goals

Allowable under federal cost principles

Not paid by federal government under another award

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Cost Sharing

Only allowable costs can be cost shared

- Faculty salaries/benefits
- Non faculty salaries/benefits
- GRA assistantships and tuition
- Equipment and M&S
- Other direct costs
- Imputed indirect costs
- Unrecovered indirect costs only with prior approval from federal awarding agency
- Cost sharing coming from third party, needs to be documented

OMB A-110, Subpart C-Post Award Requirements, section .23
http://www.whitehouse.gov/omb/circulars_a110/#23

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Cost Sharing – Companion Awards

At acceptance of the award*

- OSR
  - Provides PTA create information
  - Requests cost share funding source/s
- Division
  - Submits request for main and companion PTAs
  - Provides cost share funding source/s to OSR
- OSR activates main PTA only <u>after</u> receiving cost share funding source information

*Same process applies to "At Risk" PTAs
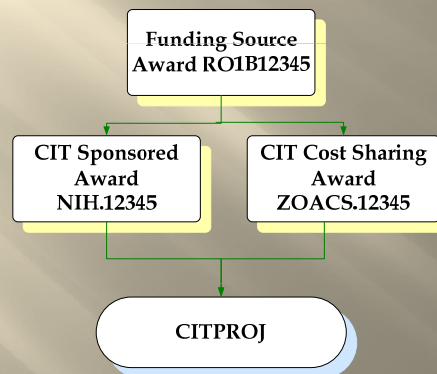
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Cost Sharing – Companion Awards

Naming convention for companion awards

- Mandatory and voluntary cost sharing = ZOACS.XXXXX
  - Z - so this PTA always appears last on PTA listings/reports
  - OACS = Other Activities Cost Sharing
  - XXXXX – Should be the same as Caltech award number
- Salary cap = <Sponsor Prefix>SAL.XXXXX
  - Example: NIHSAL.12345; or subaward: USCSAL.12345

When setting up companion PTA (including salary cap), select "**CIT Cost Share**" for Funding Source Name

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Cost Sharing Companion PTA Example

Funding Source
Award RO1B12345

CIT Sponsored
Award
NIH.12345

CIT Cost Sharing
Award
ZOACS.12345

CITPROJ

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After the Fact Cost Sharing- Voluntary Committed Cost Sharing

☐ Reductions in committed effort of key personnel may require cost sharing (from ITD Balance Report)

- If salary charged is < % of effort committed in the awarded budget & the reduction is ≥ 25%, then either:
  - the PI did not work at the level committed
    - requires sponsor approval OR
  - the PI did not charge all of the effort to the project and the difference is voluntary committed cost sharing
    - requires ZOACS companion award
    - requires PI to cover the unrecovered F&A

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After the Fact Cost Sharing – Voluntary Committed Cost Sharing

- If salary charged is < % effort committed in awarded budget & the reduction is < 25%:
  - the PI did not charge all of the effort to the project, the difference becomes voluntary committed cost sharing
    - requires ZOACS companion award
    - requires PI to cover unrecovered F&A OR
  - the PI did not perform at the committed level of effort and the reduction needs to be formally documented, via progress report (NIH, NSF)

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Voluntary Committed Cost Sharing-Resulting from PI Effort Deviations

▫Example 1: PI *committed* 10% effort, *charged* 8% salary to the award and indicated 10% effort on the *PDC* report
- ▪2% difference is voluntary committed cost sharing
- ▪Requires ZOACS companion award

▫Example 2: PI *committed* 10% effort, *charged* 8% salary to the award, and certified *PDC* for 8% effort commensurate with payroll
- ▪2% difference is voluntary committed cost sharing
- ▪Requires ZOACS companion award

▫Example 3: PI *committed* 10% effort, *charged* 8% salary to the award and certified *PDC* for effort commensurate with 8% pay; but indicated 15% in the *progress* report submitted to sponsor (NIH, NSF)
- ▪2% difference between committed effort and payroll distribution is voluntary committed is cost sharing
- ▪Requires ZOACS companion award
- ▪Remaining 5% (difference between effort *committed* and declared in the progress report) is voluntary <u>uncommitted</u> cost sharing and <u>*will not require a ZOACS companion award*</u>

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ITD Commitment Balance Report – Monitoring Key Personnel Effort

Award Manager	Award Status	Funding Source Award Number	Sponsored Award Number	Cost Share Award Number	Cost Share Project Number	Employee Name	Commitment Start Date	Commitment End Date	Total Effort Committed %	Cost Share Effort Committed %	Salaries Charged to Sponsored Award %	Salaries Charged to Cost Share %	Reduction of 25% and above
Vincent, Steve J	Active	ABCDEF-2008	ABXDEF.2008			Vincent, Steve J	01-Jan-2009	28-Feb-2010	2.00	2.00	2.00		No
Vincent, Steve J	Active	R01 DC12345	NIH.12345	NIHSAL.123 45		Vincent, Steve J	15-Sep-2008	30-Aug-2011	20.00		15.6	4.4	No
Vincent, Steve J	Active	R01 DC67890	NIH.67890	NIHSAL.678 90		Vincent, Steve J	15-Sep-2008	30-Aug-2011	30.00		23.4	6.6	No
Vincent, Steve J	Active	P50 DCAM	NIH.PROGR M			Vincent, Steve J	01-Mar-2009	30-Sep-2009	5.00		0		Yes

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NIH Salary Cap
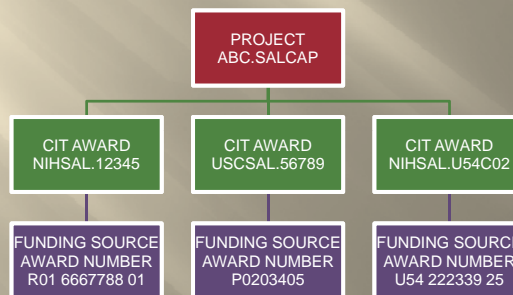
- NIH mandates salary limitations on NIH awards
- Restricts institutional base salary of personnel working on NIH awards to Executive Level I pay scale
- Requires universities to monitor salaries charged to NIH awards to match the legislative salary limitation
- Universities are allowed to pay salary amounts in excess of the salary cap with non-federal funds
- Salary cap calculator is available for divisions to calculate over the cap salary

http://www.imss.caltech.edu/cms.php?op=wiki&wiki_op=view&id=604

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Salary Cap Companion PTA Example

- Create one salary cap project # with indefinite end date per faculty/PI using PI initials: XXX.SALCAP
- Create salary cap award for each discrete award: <sponsor prefix>SAL.XXXXX
  - When submitting PTA request, use "CIT Cost Share" for Funding Source Name
- Salary cap project is linked to CIT salary cap award, NIHSAL.12345
- CIT salary cap PTA is linked to the main PTA by the funding source award #

PROJECT ABC.SALCAP

CIT AWARD NIHSAL.12345 — CIT AWARD USCSAL.56789 — CIT AWARD NIHSAL.U54C02

FUNDING SOURCE AWARD NUMBER R01 6667788 01 — FUNDING SOURCE AWARD NUMBER P0203405 — FUNDING SOURCE AWARD NUMBER U54 222339 25

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Funding Cost Sharing & Salary Cap PTA/s

Project Accounting notifies divisions & then:

- Debits *funding source* PTA/s
  - Expenditure type-Cost Share Trfs Out GB
  - Expenditure type-Cost Share Trfs Out Non GB
- Credits *cost share* PTA/s
  - Expenditure type-Cost Share Trfs In GB
  - Expenditure type-Cost Share Trfs In Non GB

Cost share PTA/s will always have *zero* budget

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Final Review of Cost Sharing Awards

Project Accounting

- confirms cost sharing commitment is met
  - ZOACS expenditures = cost share commitment
  - Requests divisions for cost sharing certifications from third parties
- verifies faculty effort from ITD Balance reports
  - Faculty effort = % on main award + % on ZOACS
- requests new CS PTA/s for after-the-fact cost sharing situations
  - faculty salary is < committed/reported level of effort
- reports cost sharing expenditures to sponsor

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NSF Salary Restrictions

NSF limits academic salary for senior project personnel to no more than two months of their regular salary received from all NSF funded grants in any one year

If anticipated, any compensation for such personnel in excess of two months needs to be disclosed in the proposal budget, justified and specifically approved by NSF

Caltech's NSF Compliance Report in Cognos Labor Distribution can be used to monitor NSF salary restriction

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Cost Transfers

What is a cost transfer ?

- Error correction
  - clerical or other errors identified during review of expenditure reports
- Reallocation of effort and other non-labor expenses where multiple projects benefit
- Reallocation of shared services
- Transfer of pre-award costs

Caltech policy on cost transfers
http://researchadministration.caltech.edu/documents/29-policy_costtransfers.pdf

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Cost Transfers

Cost transfers

- Policy does not apply to transfers from suspense to federal account within a month of the GL date
- Transfers between PTAs funded under same federal award are considered intra-award reallocation
  - Intra-award transfer form or cost transfer form without extensive justification can be used

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Cost Transfers

Cost transfers

- Need to occur within the first 90 days of the GL date
- Submit requests with backup and authorization to **PACostTransfers@caltech.edu** (new mailbox)
- Late transfers are high audit risks
- Over 90 days and/or transfers from overdrawn awards require PI and division chair's approval
- Overdraft transfers between sponsored projects are not allowed unless certain circumstances exist
- Transfers between two sponsored awards may require additional justifications

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Cost Transfers

Non-labor cost transfers under 90 days require:

- cost transfer and justification form with questions 1 through 3 answered in Section C
- supporting documentation
- approval by PI or cognizant administrator
- completed cost transfer package submitted to Project Accounting

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Cost Transfers

Labor cost transfers under 90 days require:

- adjustments entered in OGM Labor Distribution Module
- addressing the following in the text box
  - name of designated/knowledgeable individual who has reviewed and approved the transfer
  - explanation why the payroll costs were posted to the original PTA
  - explanation how the receiving account benefit from the payroll costs
  - explanation of why, based on the terms of the receiving award, the charges are allowable and allocable
- review and approval by Payroll at Caltech
  - *Payroll may request for a signed cost transfer and justification form*

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Cost Transfers

Cost transfers <u>over 90 days and/or from overspent awards</u> require:

- cost transfer and justification form with questions 1 through 5 answered in Section C
- original signatures (no rubber stamps) or email authorizations from PI, Division Chair and Project Accounting official
- labor transfers impacting certified PDCs may require recertification
- justifications need to meet extenuating circumstances from CIT Cost Transfer policy

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Cost Transfers

What will qualify as an extenuating circumstance?

Late issuance of appropriate documentation for reasons beyond the control of the requestor, such as late issuance of an award by a funding agency

Failure of another department to take action when supporting documentation had been properly submitted

Transfer of expenditures from an unrestricted account to a federal award that was not in place when the expense was incurred

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Cost Transfers

What will not qualify as an extenuating circumstance?

- Absences of the PI or cognizant administrator
- Shortage or lack of experience of the staff administering the awards
- Federally funded sponsored accounts used as a holding account for expenditures

If in doubt send PA a draft for pre-review and feedback before obtaining signatures

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Payroll Distribution Confirmation

Federal government requires effort reporting or salary certification for all directly charged salaries

Key personnel effort

- effort committed=salaries paid (direct +cost shared)
- reductions greater than 25% require sponsor approval
- reductions may create cost sharing situations

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Payroll Distribution Confirmation

PA distributes semi-annual reports

- Faculty PDC
  - faculty certifies work performed commensurate to salary received
- Award Manager PDC
  - PI certifies work performed by all personnel commensurate to salaries received

Discrepancies result in labor cost transfers

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JPL IAs and Transfers

Interdivisional Authorization (IAs)

- JPL authorizes Caltech to perform work (research or other services)
- JPL is treated as the "sponsor"
- Caltech PI and JPL PI concur on technical merit
- OSR accepts research IA from JPL
- OSR activates division's PTA request and allocates budget
- Caltech overhead rates are applied
- Caltech bills JPL for costs incurred

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JPL IAs and Transfers (cont.)

Research IAs

- Special Consideration
  - Equipment
    - JPL equipment threshold is $1,000
    - Purchase or fabricated equipment JPL is considered Government-owned equipment
    - Upon completion of the IA, Caltech will be required to return the equipment to JPL

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JPL IAs and Transfers (cont.)

JPL Transfer

- Caltech authorizes JPL to perform work (reverse of a JPL IA)
- Caltech division generates PO to JPL (via TechMart)
- Caltech Purchasing Services issues Purchase Order (PO)
- Costs are incurred on Caltech PTAs under "JPL Expenditure Exempt" expenditure type
- JPL bills Caltech for costs incurred

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Audits

OMB A-133 requirement

- annual audit for awardees expending > $500K of federal funds
- conducted by third party, PwC

Defense Contracting Agency Audits

Sponsoring agency specific

Internal reviews by ASIC

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A-133 Compliance Supplement

▣ Auditors perform 14 compliance checks
  ➢ Activities Allowed or Unallowed
  ➢ Allowable Costs/Cost Principles
  ➢ Cash Management
  ➢ Equipment and Real Property Management
  ➢ Cost Sharing
  ➢ Period of Availability
  ➢ Procurement and Suspension and Debarment
  ➢ Reporting
  ➢ Subrecipient Monitoring
  …….and other miscellaneous checks

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Federal Agency Audits

- DCAA auditors conduct year-long audits
  - Interview employees including staff, students and faculty
  - Audit charges to federal awards:
    - Supplies-documentation invoices, pos
    - Equipment-invoices, pos, physical location
    - Consulting charges-agreements, pos, invoices
  - Audit refunds issued on federal awards:
    - Vendor credits, etc.

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Agency Specific Audits

- Investigations conducted by the Inspector General's Office
- Program specific audits conducted by sponsor
- Federal Financial Report reviews conducted by NSF
- Requests for back up received from prime recipients

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Award Closeout

Project Accounting
- sends 90 day notifications to divisions
- closes main award, fabrication, cost sharing
- submits final financial report or invoice

Division
- clears open encumbrances
- approves subawardee's final invoices
- ends labor distributions
- assigns personnel to other projects

PI
- Submits final technical report/deliverables

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Award Closeout (cont.)

Property Management
- submits final property report

OSR
- submits final patent report
- follows up on late technical reports

Sponsor
- accepts final reports/deliverables
- releases final payment

Record Retention
- records are retained according to Caltech policies

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THANK YOU!

For more information check out our website:
http://researchadministration.caltech.edu
http://researchadministration.caltech.edu/theguide