

SPA – Pending Adjustments Policy



- Uniform Guidance: § 200.343 Closeout
- Award Closeout Policy for Sponsored Programs
 - Current State and Changes
- Exciting Developments

PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

The Federal awarding agency or pass-through entity will close-out the Federal award when it determines that all applicable administrative actions and all required work of the Federal award have been completed by the non-Federal entity.

Award Closeout Policy for Sponsored Programs

- It is the policy of New York University (NYU, “the University”) to comply with the requirements of the Federal Office of Management and Budget Uniform Guidance ([OMB Uniform Guidance](#)) for the financial management of sponsored projects including the timely and accurate closeout for awards.
- The purpose of this policy is to provide guidance on the Federal and other sponsor requirements for award closeout.
- This policy is applicable to all schools, departments units and personnel of the University involved in managing sponsored awards and contracts.
- On a timely basis, Department Administrators (DA’s) should run reports to identify projects expiring within 90 days. The Principal Investigators (PI’s) and the DA should ensure that all project costs have been appropriately charged. As the project nears termination, it is important to review all costs and remove those that are unallowable or inappropriate.

Current Process

- Currently, SPA provides a Final Cost Analysis to the Department to review all charges with the Principal Investigator.
- The Final Cost Analysis provides a column for pending adjustments to be listed.
- The PI certifies the Final Cost Analysis is correct, the department provides a copy to the corresponding SPA Financial Analyst and a final invoice or final financial report is generated to be submitted to the sponsor.

New Process

- In our the new process SPA will continue to provide a Final Cost Analysis to the Department to review all charges with the Principal Investigator.
- The Final Cost Analysis will no longer accept pending adjustments to be listed. Any exception will need to be reviewed and approved by SPA's senior leadership.
- The PI certifies the Final Cost Analysis is correct, the department provides a copy to the corresponding SPA Financial Analyst and a final invoice or final financial report is generated to be submitted to the sponsor.

Exciting Developments

- RPA implementation is underway – SPA Bot for prompt close outs.
- Automated Email Notifications
 - 60 Days prior to Project End Date
 - Notification on Project End Date Anniversary
 - Cost Analysis
 - Closeout guidance
- SPA quarterly meetings with Departments

Next Steps

- An updated Award Closeout Policy will be rolled out to the university community.
 - SPA has partnered with OSP in this endeavor.
- The SPA handbook will also be updated to reflect the updated pending adjustment policy change.
- Emails on the effective date of the policy will be provided to all, principal investigators departmental administrators and key grants management personnel.

Importance of Change

- Sponsored Programs Administration (SPA) will be able to prepare all interim and final Financial reports based on amounts recorded in the University's general ledger.
- Reduce the university risk on late refunds to federal agencies or other sponsors due to pending adjustments that did not post.
- Reduce audit risk.

Helpful Links

https://grants.nih.gov/grants/closeout/faq_grants_closeout.htm

https://www.ecfr.gov/cgi-bin/text-idx?SID=f98c3e4f2462625848247dfd5a53c53a&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1343

<https://www.nyu.edu/research/resources-and-support/offices/sponsored-programs-administration-handbook/closing-awards.html>

Questions?

