CCI Closeout Training

Broadband Technology Opportunities Program (BTOP)

WASHINGTON, DC April 25, 2013



Agenda

- 1. Presentation on CCI Closeout Process.
 - Aimee Meacham, Director, BTOP Program Services
- Q&A
 - Aimee Meacham, Director, BTOP Program Services
 - Jennifer Lane, Attorney-Advisor, Federal Assistance Law Division
 - Alan Conway, Branch Chief, NOAA Grants Management Division
 - Larry Jenkins, Grants Officer, NOAA Grants Management Division



Objectives

- Define Closeout and Stakeholder Roles
- Understand the Timing Related to Closeout Activities
- Identify Recipient Closeout Requirements and Closeout Documents

What is Closeout?

- Closeout is the process of ensuring that all funded project activities are complete and that recipients have met all requirements imposed by applicable laws, regulations, Office of Management and Budget (OMB) circulars, and award terms and conditions
- Recipients can facilitate the closeout process by
 - Demonstrating completion of funded project activities
 - Understanding all administrative and legal requirements
 - Completing and submitting closeout materials in a timely manner within the closeout period



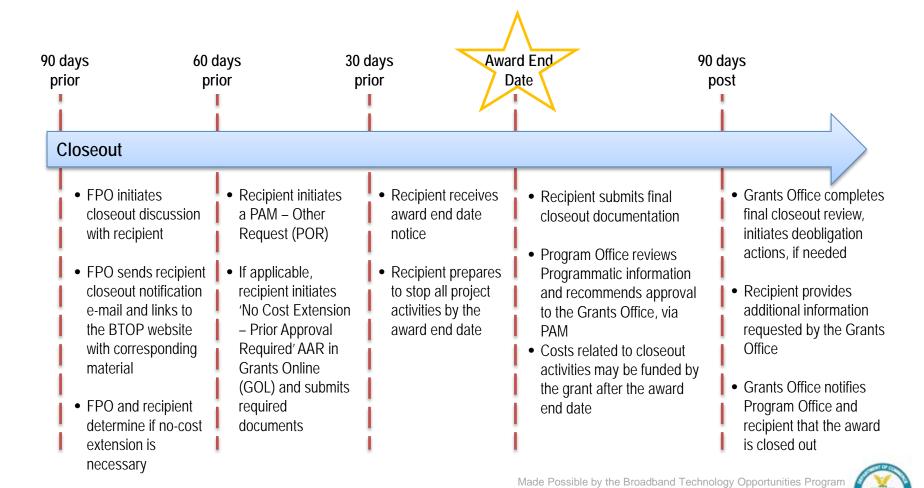


Closeout Points of Contact

- NOAA Grants Specialist
 - Serves as the recipient's main point of contact throughout the closeout process, ensuring the proper submission of documents, addressing issues with document preparation, and serving as a resource for recipient concerns
 - Performs final award reports and documentation review and evaluation
- NTIA Federal Program Officer (FPO)
 - Initiates closeout discussion, reviews, and requirements with the recipient; FPO remains active throughout the closeout process
 - Conducts preliminary review of draft award reports and documentation
- Closeout Analyst
 - Supports the Grants Specialist and FPO in working with the recipient to facilitate the closeout process



Project Closeout Timeline





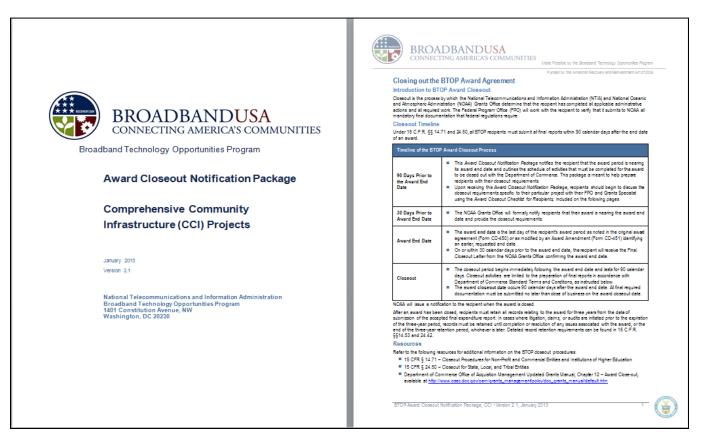
Prior to Award End Date

- FPOs will notify recipients of their upcoming award end dates and provide links to supplemental
 documentation that is posted on the BTOP website. This includes a checklist outlining the activities that
 must be completed for the award to be closed out
- Recipients should begin to discuss the closeout requirements specific to their particular projects with their FPO
- Recipients should also submit all required Federal Interest documentation to the appropriate State
 office(s) during the closeout period; and attach a scanned copy of this documentation to the final closeout
 documentation package. "Federal Interest documentation" refers to filings that establish the government's
 financial interest in substantial assets purchased or built with grant funds
- Recipients should complete any budget modification AARs prior to the award end date, if applicable





FPOs will send recipients the closeout notification memo (via email) which includes standard language regarding the closeout process, a link to the Closeout Notification Package, and the Special Award Condition (SAC) Checklist







Recipients will use the SAC Checklist to self-certify that they have complied with all BTOP award terms and conditions

BROADBANDUSA CONNECTING AMERICA'S COMMUNITIES The Position for Fractional Technology Opportunified Phylogication Pages (Special Control of 2006) Broadband Technology Opportunified Phylogication Pages (Pages) and Pages (Pages) (P	BROADBANDUSA CONNECTING AMERICA'S COMMUNITIES Uses Facility the Seathert Technique Organistics. Program Facility the Limited Facility of Seathert Technique Organistics. Program Facility the Limited Facility of Seathert Technique Organistics. Facility	BROADBANDUSA CONNECTING AMERICA'S COMMUNITIES Uses Paulie by the Facility of Facility Organization Pages Funds by the Facility of Facility Organization Pages Funds by the Facility of Facility of Facility Organization Pages Funds by the Facility Org
Special Award Condition Checklist for Project Closeout	Security Interest Requirements	<u> </u>
Recoard: A ward Number: Project Trie:	Y N N/A The recipient agrees that, for the estimated useful life of the facility funded with this award, the project will be maintained for the purpose suferized by this award and in accordance with the terms, conditions, requirements, and provisions of the award.	Y N NA The recipient completed all project construction and conducted a final inspection and acceptance text. The recipient complicit with all terms and conditions of the award, including appeted award conditions. The recipient is aware that all project records must be retained for a minimum.
Recipient's Authorized Representative:	The recipients will notify and request permission form the National Telecommunication a and information Administration (NTIA) and the Grants Office before engaging in any proposed able or lease of BTOP-danded saxets.	of three years.
Davis-Bason Viage Rate Requirements Y N NA All contractors and subcontractors have complied with the Davis-Bason vage rate requirements.	The recigient will disclose to NTIA and the Granta Office any potential ensumbrance on BTOP-funded sanets, for the estimated until life of these sarets. The recigient will not ensumber BTOP-funded anoth without first receiving permutation from NTIA and the Granta Office.	By aig ning this checklist, I certify that all BTOP-funded activities have been completed in accordance.
All laborers and mechanics emgloyed on work sites have been guid at least	Subasiajest, Requirements	
once a week.	Y N NA The recipient has informed subsections of all comming chilestines, including	Signature of Recipient's Authorized Representative Date
All covered employers have submitted a certified payers on a weekly basis. All certified payers have been signed by an employer affirming that the information is owner been and accurate.	The recipions has informed subprojectors of all enging of sky arism, including said in, non-descrimination, interconnection, findern interest, and other previous that flow down to subprojectors under the terms and conditions of the BTOP word.	Signature of Recipions's Authorized Regresentative Date
If the recipient is aware of any instances where a contractor or subcontractor	Environmental Assessment Compliance Requirement	
was required to make wage restitution: 1.) Has wage restitution been completed?	Y N N/A	Printed Name of Recipient's Authorized Representative
	The recipient has completed any required environmental assessment and related consultations, and has demonstrated compliance with all other	Finites want of Accipies a Administra Acptitionality
Do the Davis-Basen pypell files contain both the provisus certified payed in separate and the new consocied payed in reports certifying wage resolution has been completed?	applicable foderal, state, and local environmental lava and regulations. Single Audit Requirements	
Appropriate co-site interviews have been conducted with labores and mechanics complexed on west into and expenses to these interviews were compared to job charalfections used in the certified payedla reports to crosse compliance with Davis-Basen registerments	Y N N/A State, Local, and Tribal Governments; Universities; and Non-Profit Organizations: The recipient has admitted valid single sadist (i.e., A-1 33	
Has the Department of Labor conducted any investigation involving the	Audit) to the Federal Audit Cleaninghouse within nine menths of the end of the recipient's fascal year, and/or will submit such sadit after the award	
recipient?	period, as required under OMB Circular A-133.	
2.) What was the result of the investigation?	Audt No. FY ending Date submitted or N/A Findings	
The state of the s	1	
	2	
	3	
Page 1 of 3	Page 2 of 3	Page 3 of 3



^{*} The completed SAC checklist must be signed by the recipient's Authorized Organization Representative (AOR)



How Does a Recipient Complete and Submit Closeout Materials?

- Recipients are encouraged to work with their Grants Specialist, FPO and Closeout Analyst as they
 prepare closeout documents
- Recipients must upload the quarterly PPR and APR in their respective report packages in PAM, just as they have done throughout the Program
 - The Final PPR for the award must be submitted by the recipient through Grants Online (GOL)
- Recipients should continue to submit quarterly and Final FFRs in GOL
- Additional closeout documents should be attached to a PAM Other Request (POR) by the end of the 90 day closeout period (e.g., UCC-1 filings)
- Recipients should anticipate and plan for closeout-related costs. Allowable costs during the closeout
 period include such activities as preparing necessary closeout documents, conducting required audits,
 and making payments on invoices for costs of project work completed and/or billed prior to the award end
 date





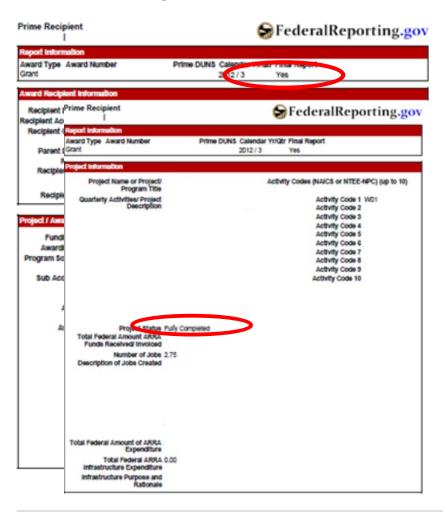
Recipients must submit the appropriate closeout documents before an award can be considered for closeout

Document	Due Date Prior to	Submission vehicle
Final ARRA	10-14 days after end of quarter	FederalReporting.gov
Final FFR (SF-425)	90 days after award end date	GOL
Quarterly PPR	30 days after award end date	PAM
Final PPR	90 days after award end date	GOL
Final APR	90 days after award end date	PAM
Final SF-424C with actuals	90 days after award end date	PAM attached to POR
SAC Checklist	90 days after award end date	PAM attached to POR
Patent/Copyright Statement	90 days after award end date	PAM attached to POR
SF-428 tangible personal property report	90 days after award end date	PAM attached to POR
SF-429 real property report	90 days after award end date	PAM attached to POR
Federal Interest documents (e.g., UCC filings and/or Covenant of Purpose, Use, and Ownership)	90 days after award end date	PAM attached to POR
Program-Specific Audit (if applicable)	90 days after closeout period	PAM attached to POR (if submitted prior to closeout) or after closeout email Grants Specialist <u>and</u> send to DOC OIG

Made Possible by the Broadband Technology Opportunities Program



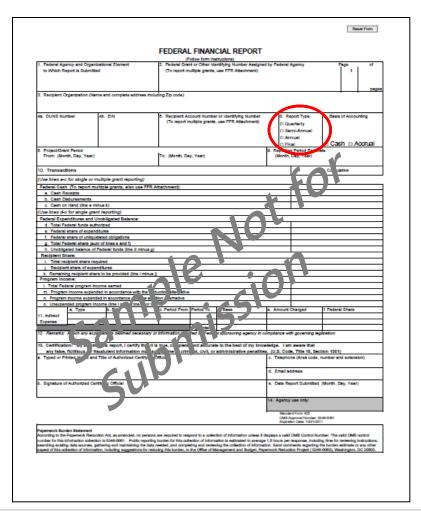
ARRA Report



- The ARRA report must be submitted within 14 days after the end of the quarter
- ARRA report must be marked as "Final" and 100% complete project status
- Funds received should match expenditures
- All vendors and subrecipients from previous reports must be included; report is cumulative
- Recipients should consult their Grants Specialists if any excess funds remain
- If a recipient draws Federal funds during the closeout period, the final ARRA report must be submitted during the next reporting cycle
- Submit via federalreporting.gov



Final FFR (SF-425)



- The FFR details all financial transactions from award inception to the completion of the award, including allowable costs that may be incurred during closeout
- Only one SF-425 is submitted during the 90 day closeout period, this will include expenditures for the final quarter of the award period, costs related to closeout activities, and/or final invoices for work completed during the award period
- Final FFR may not include any unliquidated obligations
- Line C (cash on hand) should be zero
- Submit via GOL



Quarterly and Final PPRs



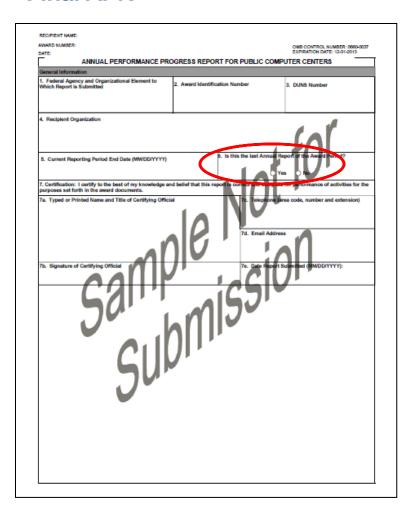
- The quarterly PPR should describe the recipient's cumulative performance against project indicators for the final quarter (or portion thereof), using the same process and definitions as prior quarterly reports
- Recipients should mark the PPR that covers the time period between the last quarterly report and the award end date as "Final"
- Recipients should submit the quarterly PPR via PAM on or no later than the regular schedule, but will have a chance to modify the report up until the end of the 90 day closeout period
- Once the quarterly PPR is approved in PAM by NTIA, recipients should take the approved PPR PDF from PAM and upload it to the GOL package labeled "Performance Progress Report -FINAL" to satisfy GOL's final report requirements

Progress Reports					
<u>Type</u>	<u>ID</u>	Period Start	Period End	<u>Due Date</u>	<u>Status</u>
Performance Progress Report	2218664	07/01/2010	09/30/2010	10/30/2010	Accepted
Performance Progress Report - FINAL	2424869	07/01/2010	03/31/2013	06/29/2013	Not Delinquent
Performance Progress Report	2224752	10/01/2010	12/31/2010	01/30/2011	Accepted
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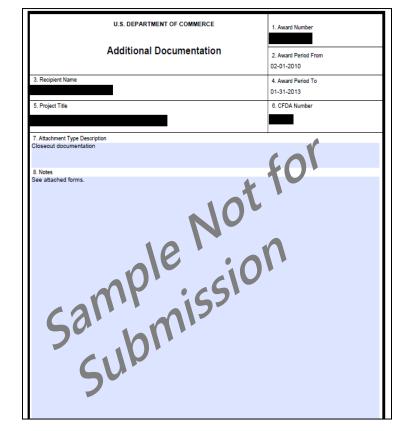
Final APR



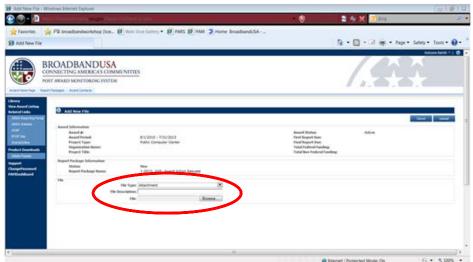
- A Final APR should be completed using the same process and definitions as prior annual reports and include the APR addendum and .kmz file
- A recipient must submit an APR for every year the award was active
- If the award end date falls within 2013, the recipient will submit an APR for 2013 and will mark it as final.
- If the award end date is 1/30/2014, the recipient will submit an APR for 2013 and an APR for 2014, marking the 2014 APR as final
- Submit via PAM (report package)



PAM Other Request (POR)



- The Final Closeout POR should be created as a PAM Other Request package and should specify in the description that the attached documents are being submitted for closeout
- All file descriptions should be noted as "Final" in PAM
- Please include a list of documents under Section 8 in the POR





Final SF-424C

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- Recipients submit a Final SF-424C detailing actual expenditures from award inception to the completion of the grant period, inclusive of closeout costs incurred after the award end date
- The SF-424C totals should align with the total Federal expenditures and total match contributions (non-Federal expenditures) listed in the Final FFR and PPR
- Submit via PAM (POR)





Property Management and Disposition

- According to the Uniform Administrative Requirement (UAR), title to equipment and supplies vests in the
 recipient upon acquisition and it must conduct an inventory every two years as long as the equipment has
 value over \$5,000. Recipients maintain this inventory for their records (i.e., they do not need to submit it to
 NTIA or NOAA)
- However, recipients may be required to compensate the Government if they choose to sell or use acquired property for non-Federally sponsored programs. This includes:
 - Equipment with a per-unit current fair market value of \$5,000 or more
 - Supplies with an aggregate residual unused value of \$5,000 or more
 - Real property (e.g., land, land improvements, structures)
- Fair Market Value can be determined based on the purchase price and depreciation schedule maintained by the recipient



SF-428

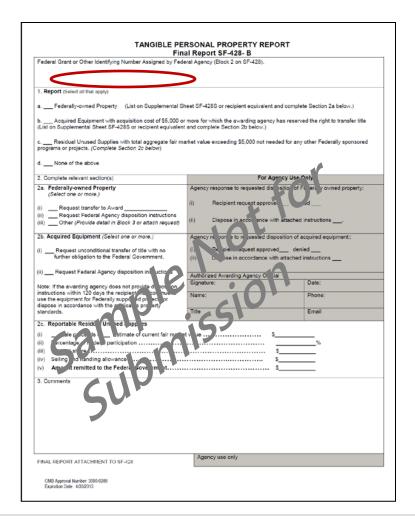
TANGIBLE PERS	ONAL PROPERTY REPOR SF- 428	RT	
		Page	of Pages
1.Federal Agency and Organization Element to Which Report is Submitted Number	al Grant or Other Identifying Assigned by Federal Agency	3a. DUNS	3b. EIN
Recipient Organization (Name and complete address including	g zip code)	5. Recipient Accour Number	nt or identifying
Attachment (Check applicable)		7. Supplemental Sh	eet
Annual Report (SF-428-A)		Yes	
Final (Award Closeout) Report (SF-428-B)	4	No	
Disposition Report/Request (8F-428-C)	\$(),	
8. Comments	* 1		
Bs. Typed or Printed Same an Tis or Authorized Certifying Official	SC Telephone (area code, number)	extenzion)	
Sa. Typed or Printed Name at TIS of Authorized Certifying Official	and the property of the control of t	Ciciany	
	9d. Email address		
9b. Signature of authorized Certifying Official	9e. Date report submitted (Month, I	Day, Year)	
	10. Agency use only		
	SF-428 Tangkle Per OMB Approve Number DUFFIN DATE: 0	r: 3090-0289	

- Recipients account for BTOP-funded tangible personal property by completing a SF-428, SF-428B, and SF-428S
- All recipients must submit a SF-428 cover sheet and Attachment B
- If there is no tangible property to report, recipients should write "Not Applicable" under Section 8.
- A supplemental sheet, SF-428S, may be necessary to provide detailed information for each item
- Submit via PAM (POR)





SF-428 Attachment B



- The SF-428B is used during award closeout to allow recipients to request a disposition of acquired property
- Recipients select all applicable options in Section 1 and complete the corresponding questions 2a-2c
- Submit via PAM (POR)





SF-428 Attachment S



- The SF-428S is used by recipients to provide detailed information on individual items
- Grantees who checked "Yes" to Question 7 on the SF-428S or selected option 1b on the SF-428B should complete Attachment S or submit an equivalent document
- Submit via PAM (POR)





SF-429



- Recipients account for real property (e.g., land or improvements) by completing a SF-429
- All recipients must submit a SF-429 cover sheet even if there is no real property to report
- Only those who purchased/improved real property using BTOP funds or contributed it as match must complete the SF-429A
- Submit via PAM (POR)





SF-429 Attachment A

		ontrol No.: 07/31/201		96
Real Property Status Report ATTACHMENT A (General Reporting) 8F-428-A				
Federal Grant or Other Identifying Number Assigned by Federal Agency (#2 on cover page)	Pa	je:	of:	Pages
omplete the applicable blocks below for each parcel of real property being reported (duplicate this	page to prov	ide Inform	nation f	or each parc
real property being reported under the Federal financial assistance award identified in section 2):				
Period and type of Federal Interest (MM/DD/YYYY): From: To:				
Acquisition Renovation Construction Government Furnished Property 14a, Description of Real Property:				
ina. Description of Real Property.		l.		
14b. Address of Real Property (legal description and complete address including zoning information)				
140. Address of Real Property (legal description and complete address including zoning information)				
14c. Land Acreage or Square Units: 14d. Gross and Usable Jua	Foots eMe			
Enter Amount:	FACE DIME	ters (i.e.,	or buildin	g, nouse,
Select units:AcresSquare Feet Enter Amounts: Gross	Usable			
14e. Real Property Ownership Type(s):	Square Me	nur S		
A Cured B Co-Cured C Fee Simple	_			
D. Corporate E. Joint Tenancy F. Partnership G Cimit _ Lis Partnersh I. Government Furnished Property J. Other (Describe): G Cimit _ Lis Partnersh	р <u> —</u> н.	uo-Opera	ove	
14f. Real Property Cost: \$ Sh. Per Intage %:				
Federal Share: 5 [%]				
Total (sum of Federal and Non-Federal Sha I): \$ %				
Yes No N/A	st in this real p			
f yes (unless previously reported), discourse the insourrent used and enter the date at 1 jurison tiols in white	ch it was recor	ded:		
14h. Has Federally requiry and real erage been secured for this recorded Yes No. See Instructions for eight s.				
141. Are there any lifter Reic atto. Act (URA) requirements ap licable to the real property? Yes	No			
14 Are thr Try Viron ental comulance requirements relited to triple property? Yes	No			
yes, de critic her lattach additional sheets if necessary):				
4k-in act ords ille with the National Historic Triess stion (ct (NFA), does the property possess historic to the description of the property possess historic to the	significance,	and/or is it	t listed o	eligible for
f was districted them (attach add that the control say):				
Has a significant change acculied with the leaf property, or is there an anticipated change expected the leaf property.	a auring the	next repo	rting pe	nod?
f yes, describe (e charle (at) ch a munial sheets if necessary):				
16. Real Project / Disposition () Just:				
A. SoldTerred to different awardC. Used in other Federally sponsored proj	ect/program			
D. Transferred ti E. Retained Title F. N/A				
I. If the Fed Agency provided the recipient disposition instructions to sell or retain title to the real pr	operty, enter t	he amoun	t of fur	nds owed to
the Federal government:				
II. If applicable, enter the amount of any net proceeds from the sale of the real property and describe h	ow the procee	ds were o	dstribute	d:
II. If the Federal agency directed the recipient to transfer title to the real property, enter the amount of t	tunds the Fede	ral Agenc	y owe:	
17. Indicate the cumulative energy consumption for the previous 12 months:				
A. Electric (kWh) or (Btu) B. Petroleum (Gal)C. Natural Gas (cu ft)C). Other (Spec	fy)	_	
18. Remarks (attach additional sheets if necessary):				
Attachment A (General Reporting) to	Real Property	Status Re	eport SF	429
ii	Star	dard Form	129 (9/201	1)

- The SF-429A allows recipients to provide the requested information in section 13-18 of Attachment A for each parcel of real property reported
- Submit via PAM (POR)





Final Patent Report

ATTACHMENT
FINAL PATENT REPORT
Recipient Name:
Cooperative Agreement Number:
I certify that no subject inventions were disclosed during the grant cool feative agreement period.
The final patent report is attached, listing all inventions declared during the award period.
The Recipient shall disclose each subject invention to NISt within to omoths after the inventor discloses it in writing to Recipient personnel responsible for patent made. The disclosure to NIST shall be in the form of a written report and shall identify the award under which he termion was made and the inventor(s). If shall at a minimum, contain the following information: (1) the title of the invention; (2) the names of all inventors; (3) the name and address of the wasignee (if any); (4) an acknowled male of the passage (if any); (5) the filling of the present invention; (6) another fact if the disclosure (7) of decreased is a signe); (8) the filling of the present invention; (9) another fact from disclosure (10) of the provided invention of the provided invention; (11) the standard in the Receive (in the following to the Grants Office: (12) the standard in the receive of the patent standard; (23) the disclosure as issued (including the drawings) and; (24) the name, address, and telephone number(s) of an assignee
Company Authorizing Official Date
Note: In the event that the Recipient determines that an invention or patent was made under the purview of the award after the filing of this document, they are instructed to forward the information to the Grants Officer.
National Institute of Standards and Technology Grants & Agreements Management Division 100 Bureau Drive, Bldg. 411, Mail Stop 1650 Gaithersburg. MD 20899-1650

- The Final Patent Report is included as an attachment in the PAM (POR)
- NOAA will accept a letter on the recipient's letterhead, signed by the AOR, stating an invention or patent was not made under the award





Federal Interest - Covenant Of Use And Ownership

BROADBANDUSA CONNECTING AMERICA'S COMMUNITIES Attachment A - SAMPLE Covenant of Purpose, Use and Ownership Form THIS COVENANT OF PURI UCC FINANCING STATEMENT National Telecommunication 1401 Constitution Avenue. called "NTIA"). Technology Opportunities P Pub. L. No. 111-5, 123 Stat. WHEREAS, by Off assistance award designate (hereinafter called "Award A called "Project"); and WHEREAS, to exe with funds made available th hereto and incorporated her WHEREAS, on documents attached thereto and pertaining to the Award contained in the Award Agre Regulations (C.F.R.), Parts Reg. 33104 (Jul. 9, 2009) or applicable; and WHEREAS, the A provides, inter alia, that Rec not sell, lease, transfer, conor use the Property for purp the application made by Red prohibited by 15 C.F.R. Part FORM SHOULD BE TYPEWRITTEN OR COMPUTER GENERATED

NTIA retains an undivided equitable reversionary interest in all real or personal property that recipients and subrecipients acquire or improve using Federal or match funds, for the entire useful life of the property

During the duration of the Federal Interest, recipients cannot sell or transfer assets without prior Grants Office approval or use the property for non-BTOP purposes without prior approval

Recipients with a Security Interest SAC have to submit documentation, such as:

- Covenant of Purpose to document the Federal Interest in real property
- UCC-1 to document the Federal Interest in fixtures or personal property other than supplies
- Attorney Certification that documents were properly executed and filed in accordance with state law





Program Specific Audit (For-Profit recipients only)

- Commercial and for-profit entities may have to submit a program specific audit if the recipient received a BTOP award greater than \$100,000
- A copy of the Audit Report must be submitted within 90 days following the closeout date to the DOC Office of the Inspector General (OIG) and in PAM (POR)
- For-profit entities required to do a program-specific audit during the closeout period may pay for those audit expenses using BTOP funds



After NTIA reviews and submits closeout documentation, NOAA conducts a final review and takes the remaining steps to close the grant

- NOAA Grants Office will perform financial reconciliation and notify the recipient that the award has been satisfactorily closed
- If applicable, the Grants Office prepares a Deobligation Memo and submits it to the NTIA Budget Office
- Recipients must maintain records relating to the grant for at least <u>three years</u> after the recipient submits its final federal expenditure report
- Recipients must continue to comply with any ongoing audit and property management requirements





Early Closeout

- A recipient may want to terminate its award early after completing all project goals
- To initiate the process, a recipient should initiate a "Termination for Convenience" AAR and attach a letter from the recipient's AOR requesting that the award terminate early. Once approved, this action will amend the award end date to the new requested end date. Upon project completion, the recipient will need to send all final closeout materials to its Grants Specialist, FPO, and Closeout Analyst to close out the award
 - Amended award end dates will always fall on the last day of the quarter
- Recipients wanting to terminate their awards early should submit their requests in GOL





What happens after the award closes?



- After the award is closed, recipients must continue to:
 - Use BTOP-funded equipment for the purposes under the award
 - Retain grant file and related records for at least three years
 - Complete an inventory of grant-funded equipment at least every two years and for the useful life of the equipment
 - Update UCC-1 filings every five years





Additional Resources

- 15 CFR § 14.71 Closeout Procedures for Non-Profit and Commercial Entities and Institutions of Higher Education
- 15 CFR § 24.50 Closeout Procedures for State, Local, and Tribal Entities
- Department of Commerce Office of Acquisition Management Updated Grants Manual, Chapter 12 – Award Close-out, available at http://www.osec.doc.gov/oam/archive/docs/Ch12%20Award%20Close-out%20[revised%20June%202007].pdf
- Closeout documents are available on NTIA's website under Award Closeout Requirements at http://www2.ntia.doc.gov/compliance
- Additional guidance on completing closeout forms is available on the <u>BTOP</u> Collaboration Wiki



Questions