



## PCC /SBA Closeout Training Questions and Answers April 11, 2013

### Reporting Timelines

Q: *When are the final reports due? What time period should the final reports cover?*

A: NTIA requests that recipients submit drafts of the final **FFR**, **APR**, and **PPR** no later than 30 days after the close of the quarter in which the award end date falls. This will allow NTIA to provide critical information to Congress and other stakeholders on a timely basis. **Recipients will then have the option to revise the reports throughout the 90-day closeout period.**

The final **PPR (the Quarterly Performance Progress Report)** covers the period from the most recent PPR to the award end date. Award end dates generally fall on the last day of the quarter, but if they do not, the PPR should cover that portion of the quarter during which the award is active.

The final **APR (Annual Performance Report)** is due by the end of the 90-day closeout period. A recipient must submit an APR for every year the award was active. Thus, if the award end date is 1/31/2014, the recipient will submit an APR for 2013 and an APR for 2014, marking the 2014 APR as final.

The final **FFR (Federal Financial Report, or SF-425)** covers the period between the most recent FFR and the end of the closeout period.

Submission of the final **ARRA (American Recovery and Reinvestment Act)** report follows the OMB schedule of 10-14 days after the end of the quarter. The final ARRA report covers the time period between the most recent ARRA report and project completion. For ARRA reporting purposes, the project is complete only when the recipient has executed all project activities and drawn down all funds from **ASAPS (Automated Standard Application Payment System)**. In some cases, this will mean that a recipient will need to file the final ARRA report in the quarter that *follows* the 90-day closeout period.

Please refer to the following chart for a summary of deadlines.

If your award ends in...	Submit ARRA by	Submit Draft FFR, APR and PPR by	Submit FINAL FFR, PPR and APR by
<b>January</b>	April 10-14	April 30	90 days after award end date
<b>February</b>	April 10-14	April 30	90 days after award end date
<b>March</b>	April 10-14	April 30	90 days after award end date
<b>April</b>	July 10-14	July 30	90 days after award end date
<b>May</b>	July 10-14	July 30	90 days after award end date
<b>June</b>	July 10-14	July 30	90 days after award end date
<b>July</b>	October 10-14	October 30	90 days after award end date
<b>August</b>	October 10-14	October 30	90 days after award end date



<b>September</b>	October 10-14	October 30	90 days after award end date
<b>October</b>	January 10-14	January 30	90 days after award end date
<b>November</b>	January 10-14	January 30	90 days after award end date
<b>December</b>	January 10-14	January 30	90 days after award end date

Q: *When should I submit the final FFR? Should it cover the period through the award end date only or should it include closeout-related costs?*

A: The final FFR should reflect all expenditures, including any closeout related costs. The final FFR should not reflect any unliquidated obligations or remaining share due from the recipient. Recipients should submit the final FFR after identifying all expenditures , but no later than 90 calendar days after the award end date.

Q: *Do I need to submit an ARRA report while I am in closeout?*

A: Recipients must submit an ARRA report for every quarter in which they make a drawdown. Depending on the timing of the final drawdown in ASAP, recipients may have to submit their final ARRA report in the quarter following the 90-day closeout period.

Q: *If NIST discovers an error requiring correction after I have submitted all required closeout documents, should I submit the revised document(s) through the PAM system or email them directly to my Grants Specialist?*

A: NIST will instruct recipients how to submit revisions.

**Eligible Closeout Costs**

Q: *May I incur costs after the award end date? When should I request final costs through ASAP?*

A: Recipients may only incur costs for closeout activities after the award end date. Closeout activities are limited to the preparation of final reports, such as progress, financial, and audit reports. Recipients should request final costs through ASAP prior to the end of the 90-day closeout period.

Q: *Do I have to contribute all match before the award end date or may I count as match staff costs for preparing final reports during the closeout period?*

A: Recipients may count as match staff costs for preparing final reports during closeout and should reflect these contributions in the recipient share of expenditures reported on the FFR.

Q: *May I initiate closeout with a provisional indirect cost rate? For example, my grant ends in the fall of 2013; however, my deadline to submit my 2013 indirect cost proposal is June 2014.*

A: The recipients should use the latest approved rate in closeout. If a lower rate is approved after the award closes, then recipients should identify disallowed expenditures during the audit and request a refund during the audit resolution process.

**Budget Modifications**

Q: *How long will it take to receive approval for a budget modification?*

A: If recipients provide all the required information at the time of submittal, and minimal revision is necessary, then the Program Office may recommend approval of the budget modification from the Grants Office. The Grants Office may take up to 45 days to approve the budget change. When submitting a budget modification, recipients will need to submit a SF-424A or SF-424C that reflects the



requested budget, a revised detailed budget, and a budget narrative that describes all of the requested changes.

Q: *When should I submit a budget modification?*

A: NIST strongly recommends that recipients submit changes to the budget that require Grants Office approval and obtain such approval before initiating an AAR for closeout. As soon as recipients are aware of the need for budget revisions, they should contact their FPO and the Grants Office.

### Completing the SF-428

Q: *Should I include on the SF-428 and UCC-1 subrecipient equipment purchased with BTOP funds and valued over \$5000?*

A: Yes, recipients must report subrecipient equipment valued over \$5000 on the SF-428 and the UCC-1 form.

Q: *Please clarify the rules regarding federal security interest obligations on BTOP-funded equipment versus equipment contributed to BTOP as match. Do I need to provide documentation for equipment contributed as match?*

A: If you purchased equipment prior to the start of your BTOP award, then you do not need to provide documentation for equipment contributed as match. If, however, you used matching funds to purchase equipment after the award, the Federal Interest applies to that item and is equal to the share of Federal participation in the project as a whole. This means that if project support included 80 percent federal funds and 20 percent matching funds, then the Federal Interest in all property acquired under the award is 80 percent. Review the [Federal Interest Documentation Requirements](#) on NTIA's website.

Q: *How does depreciation factor into the value of items for purposes of completing the SF-428? Should I use the purchase price, the depreciated value, or some other fair market value (FMV) source when determining whether to report equipment?*

A: Please follow the directions in the SF-428.

Q: *If an item has depreciated below the \$5000 per unit threshold, would I then consider it as a supply? Would I need to include the residual value in my calculation of unused supplies?*

A: If you placed an item meeting the definition of supply in the DOC regulations (e.g., 15 CFR 14.2 (kk), 14.37) supply into service during the award, then it is not "unused" for the purpose of calculating the residual value of unused supplies.