Necessary Changes to Meet the NEW Federal Closeout Policies

How to prepare for the new policies and avoid loss of funds for NURAP@ Noon
March 17th (EV) and March 18th (CH)
May 2014 we talked about …

1. Payment Management System (PMS) cash payment requests for HHS LOC grants will be transitioned from the “pooling” method to individual Subaccount requests

2. New Payment Management System (PMS) grant expiration/closeout process

In addition Uniform Guidance directives came out this year.

Today’s Focus is on bold items Only
Today’s Discussion

Focus is on Financial Closeout

- Policies
  - What do the new and different policies mean?
  - What it means for NU?
  - How we can prepare?
  - What coordination is required for a timely and smooth closeout?
  - Concentration on DHHS complexities as well as NSF, DOD and other agencies’ closeout differences

- Proactive activities we can take to get ready for new closeout process
Bottom-line

- Federal Government wants to close awards out faster
  - Shortly after the end date of a grant in many cases
- Wants transparency
- Wants all financial reports to match within 90 days after end date with little to no wiggle room for adjustments. Even with the NIH/NSF 120 allowance for awards closing after 10/2014
  - Financially an award has to be ready for reporting and closeout within ~45 days after the end date
  - Agencies that have Federal Cash Transaction Report (FCTR) due are the awards most affected by changes we have to implement
## Reminder of the HHS Closeout Reports

<table>
<thead>
<tr>
<th>Report</th>
<th>Form</th>
<th>Description</th>
<th>Due</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Financial Report (FFR)</td>
<td>(SF425) Submitted in Commons</td>
<td>Federal Financial Report is required on an annual basis, except for domestic awards under the Streamlined Noncompeting Award Process (SNAP). Final FFRs must indicate the exact balance of unobligated funds and may not reflect any unliquidated obligations (encumbrances)</td>
<td>90 days from End date</td>
<td>*Fellowships (F30-F32) do not require these. Adhere to strict closeout time line Draw down and FCTR are the only reports for those awards</td>
</tr>
<tr>
<td>Federal Cash Transaction Report (FCTR)</td>
<td>(SF425) Submitted in PMS</td>
<td>Quarterly Federal Cash Transactions report data included for the final quarter of the project period, must be submitted to the Payment Management System. DOE, DOL, DOJ, HRSA, NEH, NIH, HS, NASA have FCTRs due</td>
<td>Specific Qtrs. Due every Jan, April, July, Oct</td>
<td>aka PMS FFR but NU will refer to it as FCTR to avoid confusion</td>
</tr>
<tr>
<td>Drawdown / Cash Disbursements</td>
<td>Submitted in PMS</td>
<td>NU request for reimbursement of expenses paid.. Advanced funds requested on an as-needed basis</td>
<td>Last day to draw funds is 90 days from the end date</td>
<td>Generally, a weekly action. May occur more frequently for “P” subaccounts</td>
</tr>
<tr>
<td>Final Invention Report</td>
<td>(HHS 568) Submitted in commons</td>
<td>A report that should include all inventions which were conceived during the course of the work under the grant. Inventions should be reported in iEdison. The report is submitted in commons</td>
<td>90 days from End date</td>
<td>Required for all awards except Training grants, Fellowships, and certain other programs—e.g., activity codes C06, R13, R25, S10.</td>
</tr>
<tr>
<td>Final Progress report</td>
<td>(PHS 2590/RPPR) Submitted in Commons</td>
<td>Report summarizes progress made toward the achievement of scientific aims and identifies significant outcomes.</td>
<td>90 days from End date</td>
<td></td>
</tr>
<tr>
<td>Termination Notice</td>
<td>(PHS 416-7) Submitted in Commons</td>
<td>For Training Grants, Fellowships and some K awards only..</td>
<td>30 days from appointment</td>
<td></td>
</tr>
</tbody>
</table>
Terminology

**Bilateral Closeout**
- Defined as closeout with the cooperation of the recipient and the funding agency.
- This means we are all in agreement.
- All reports say the same thing

**Unilateral Closeout**
- Is the process by which the funding agency closes out an award without receipt of acceptable final reports required by the terms and conditions of an award, after making reasonable efforts to obtain them.
- NIH says they will close expenses at lowest report...
Summary of Notices Received

- Federal government agencies want to close awards bilaterally within 90 days.

- UG §200.343 tells us reports are due 90 days from the end date with mention of 120 days (extra 30 days) for some cases (ex: NIH and NSF have 120 days).
  - Because of this the NIH will not grant extensions for more time to send a final report (financial, progress or invention).
  - Extra 30 days are not for financial reporting—Future slides address this.

- NIH Closeout FAQ informs us of unilateral close at 180 days.
  - Unilateral Close means NU has submitted reports that do not match by 179th day after closeout. NIH will close out the award without NU consent or affirmation on 180th day.
  - Also mentions FFR should match the FCTR, if they do not, they will close at the lowest reported amount.
Consequences of Missing Deadlines

- NIH
  - unilateral action to close the grant and/or enforcement actions for recurring reporting problems
    - *It is important to note that for financial closeout, if a grantee fails to submit a final expenditure FFR, NIH is directed to close the grant using the last recorded cash drawdown level
      - Loss of funding for departments.
      - If closed at a lower expenditure amount, this could be considered a debt or result in disallowed costs.
    - Potential corrective actions: withholding of further awards, suspension or termination
    - removal of authorities (e.g., SNAP, automatic carryover) on active grants.
  - Watch Invention, Progress/Technical reports
    - We don’t want NU as a whole to be punished because of missing reports
When did this begin and How do we start to prepare for this?

- PMS closeout changes began 10/1/2014 on all awards P (subaccount) and G (pooled)
  - At first we thought it was just P, but it’s everything
- In order for NU to get full reimbursement, departments need to reconcile early and often to prevent a loss of funding
- DOD, NSF and NASA already in effect

Note: in order for reports to be submitted on time and maximize reimbursement, cutoffs of final actions are required.
New Closeout Timeline

for 610 funds (DHHS and NSF)

12 Month Budget Period → 120 days after Expiration of Budget

Dept. Processes Transactions ➔ Final Action Date ➔ GCFA Prep's Final Invoice/Report ➔ Final Report/Invoice Due ➔ Closeout

15-45 Days After Budget End Date
30-90 Days After Budget End Date

NASA, Dept. of Ed, Dept. of Energy, DoD, are only 90.

Not mentioned on this slide is the Federal Cash Transaction Report.
Federal Cash Transaction Report (FCTR) is submitted based on US Government Fiscal quarters. Figures reported on the FCTR are based on budget statement financial data for that quarter. FCTR is due 30 days after the quarter ends.

<table>
<thead>
<tr>
<th>FCTR quarter</th>
<th>FCTR Due</th>
<th>NUFIN Budget statement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oct 1ST- Dec 31st</td>
<td>Jan 30th</td>
<td>December 31st</td>
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<tr>
<td>Jan 1ST- March 31st</td>
<td>April 30th</td>
<td>March 31st</td>
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<tr>
<td>April 1ST- June 30th</td>
<td>July 30th</td>
<td>June 30th</td>
</tr>
<tr>
<td>July 1ST- Sept 30th</td>
<td>Oct 30th</td>
<td>September 30th</td>
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Agencies that Require Federal Cash Transaction Reports (FCTR)

- Agencies that have FCTR’s due Quarterly
  - Department of Energy (DOE)
  - Department of Justice (DOJ)
  - Department of Labor* (DOL)
  - Department of Homeland Security
  - National Endowment for the Humanities (NEH)
  - National Institutes of Health (NIH)
  - NASA (National Aeronautics and Space Administration)
  - Health Resources and Services Administration (HRSA)
How FCTR and FFR don’t line up

30-45 day window to finalize expenses

**Day 120** (DHHS/NSF Reporting Deadline)
Note in this example This award can’t afford to not have expenses on after September

Day 180
UNILATERAL CLOSE
• For Grant ending July that date is Jan 30th

All Expenses posted by Sept 30th

Draw Down Deadline
• Oct 29th

FFR Due
• Oct 29th (90 days from end date) **

FCTR Quarterly Report Due
• For September due October 30th

FCTR Quarterly Report
• For December due Jan 30th

Some Agencies only give 90 day cut off

**90 days means exactly 90 days not the end of the month**
New Business Practices

• Expenses **MUST be posted** on the grants **to be reported**
  o Hint: **IF** it is visibly posted on the GM045 in Column B, C or D it counts.

  • **If it is encumbered or budget checked (it does not count) it will not be included on invoice or FFR’**
    - columns E and F do not count

  • Remember, budget overview will not decipher between budget checked and posted for certain transactions. It’s best to use GM045 when looking at what posted

• Awards need to be **reconciled and complete by the end date.** That means all errors were found and corrections have been processed and routed to post before the end date

• If expenses are on the grant by the end date it will be on the report
  o Everything else requires special care and potential special requests
## Fund 610
### 45 day bilateral closeout deadlines

<table>
<thead>
<tr>
<th>End date of a 610 fund award</th>
<th>Last day to submit 90 day SALARY journal to ASRSP</th>
<th>Bilateral Close deadline for departments</th>
<th>FFR Due and Draw-down deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jan 31st</td>
<td>Jan 31st</td>
<td>March 15th</td>
<td>May 1st</td>
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<tr>
<td>Feb 28th</td>
<td>Feb 28th</td>
<td>April 15th</td>
<td>May 29th</td>
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<td>March 31st</td>
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<td>July 30-31st</td>
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<td>Nov 30th</td>
<td>November 25th**</td>
<td>Jan 15th</td>
<td>Feb 28th</td>
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<tr>
<td>December 31st</td>
<td>December 15**</td>
<td>Feb 15th</td>
<td>March 31st</td>
</tr>
</tbody>
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**During Holiday season AND NU fiscal year close keep in mind journals take longer to process due to vacations please try to submit earlier**
### Fund 620
30 day bilateral closeout deadlines. May be less if sponsor gives us shorter deadline

<table>
<thead>
<tr>
<th>End date of a 620 fund award</th>
<th>Last day to submit 90 day Salary journal to ASRSP. All approvals are on journal</th>
<th>Bilateral Close deadline for departments</th>
<th>Final Invoice is due ASRSP GCFA will need to send by this date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jan 31st</td>
<td>December 15&lt;sup&gt;th&lt;/sup&gt;**</td>
<td>Feb 28th</td>
<td>March 15th</td>
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<tr>
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<td>January 31st</td>
<td>March 31st</td>
<td>April 15th</td>
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<tr>
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<td>February 28th</td>
<td>April 30th</td>
<td>May 15th</td>
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<td>May 31&lt;sup&gt;st&lt;/sup&gt;</td>
<td>July 31st</td>
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<tr>
<td>July 30- 31&lt;sup&gt;st&lt;/sup&gt;</td>
<td>June 30th</td>
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<td>Sept 15&lt;sup&gt;th&lt;/sup&gt;</td>
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<td>August 31st</td>
<td>July 31st</td>
<td>30-Sep</td>
<td>Oct 15th</td>
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<tr>
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**During Holiday season And NU FY Close keep in mind journals take longer to process due to vacations please try to submit earlier**
How are we going to deal with this?

Communication is the KEY

• GCFA has to submit the reports on time, so communication is key to reporting accurately and timely.
  o Both from GCFA and Dept. staff should be in agreement about expenses on the 45th day.
  o RA’s need to inform GCFA about anything that is pending that did not post on the grant by the end date.
  o GCFA is juggling many award closeouts at once in addition to other duties so the clearer an email is the better we can prepare for what is to come.
All valid expenses must be on the grant no later than 30-45 days from the end date. Additional Expenses cannot be added after 60 days.

Final expenses posting after the end date should be limited to:

- Subcontract invoices
- Expense Reports for travel in the last month of the grant
- Encumbrances should be paid out ASAP cleared by day 45.
- Payroll adjustments should be limited
- Any outstanding DPRs should be approved and paid
Cost Transfers- All kinds

• Avoid cost transfers after the grant end date
  o Consider it worst time to send one for two reasons
    • Time it takes to approve and post
    • Audit RED flag.
• Remember for payroll journals over 90 days old: from the time you hand expenses to the dean’s office it takes 30 days assuming the journal packet is correct. Please submit as early as possible
• Do it right the first time
Payroll Over 90 days Old

- 610: Last day to submit a payroll journal to ASRSP that is over 90 days old should be the grant end date. This means you review payroll 60 days before the grant and submitting journals to the Dean no later than 30 days before the grant end date.
  - If a special situation is occurring—discuss it with the GCFA. They may need to communicate with other personnel to ensure the receipt of journal can be still be accomplished.
    - Keep in mind the approval process depends on availability of other approvers and departments.
- 620 funds have a 45 day closeout window, so we may need to limit 90 day journals for 620 funds to ASRSP at 30 days before the end date. This means you have to have it submitted to the Dean 60 days before the grant ends.
- Please see routing documentation http://www.northwestern.edu/asrsp/grant-management/monitoring-your-grant.html
Deployed Payroll

- Deployed Payroll approvals are all online and do not involve ASRSP GCFA or Effort Coordinators approval
- Deployed journals should show up on NUFIN (not FASIS) before the report is due. Remember FASIS GL Run has about a 1 week processing time
- **RULE to avoid a loss of funds:** The journal should post in FASIS 2 weeks before the bilateral deadline
  - Talk with GCFA if you’re processing a deployed journal after the grant end date so coordination of report is in line with the journal posting.
  - Ex: a grant ends Jan 31st, the bilateral deadline is March 15th all deployed journals should be approved and ready to post no later than Feb 28th to ensure it actually posts in NUFIN.
- Deployed journals that are rejected and don’t make it on the GM045 by the time the report is due will not be included on the report.
  - Expenses must show on the GM045 not in FASIS to be included.
Effort Review

• Effort Coordinators review certified effort against payroll charges ~60-90 days before grant ends

• Monitoring items include
  o Salary charges vs. certified effort
  o NIH Salary cap
  o Career award effort (generally 75%)
  o Mandatory and Voluntary Committed Cost Share

• If issues detected, Effort Coordinators follow up with the department to resolve issues and compliance risks

• Please make sure to review and take action timely
Closing Letter

• Closing letter is a tool that should be used to manage your grant.
• Use it to Generate conversations with PI and other staff about what is needed. Especially if a NCE is required.
• When you receive it, use it as your trigger to…
  o Review payroll
    • Is anything missing?
    • Are there any corrections? if so. they have to be submitted ASAP; you only have a few days left
  o Subcontracts:
    • Is the invoicing up to date?
    • Send a reminder email that final invoice is needed 45 days from the end date of their agreement or sooner.
  o Review the original detailed budget or financial plan you developed for items you may have overlooked.
• You will not get a closing letter for…
  o Pre-spending /Pre-award accounts
  o Awards that arrive late for execution- Reports are still due on time
    • If you get a PAS with a closeout that is approaching you may need to drop everything and set time aside to get expenses posted for reporting
    • Ask yourself why you didn’t get a pre-spend account
Pre-award / Pre-spending

- Pre-spend accounts for
  - Tool supported by Federal Government (Audits mention it)
  - Set up pre-spend accounts to avoid cost transfers
  - Great tool to charge expenses correctly the first time
  - Time saver and after the award is set up a stress saver too
  - Allows for correct Effort Certification

- Responsibility of set up is between Department and OSR via ESPR request. ASRSP is not involved until the full execution of the award

- Department is responsible for financial outcome until award is fully executed. Less of a risk on federal awards that seem to just be taking time to negotiate

- Common for 620 fund to have a chart string set up until the agreement is executed
  - Typically it is subcontracts that take time to get awarded

- Please use this tool to avoid timeliness issues that could cost loss of funds
What about Outgoing Subcontracts Final Invoices?

- OSR is working on sending a 45 day deadline on new agreements
  - Look over your agreements. If any say 60 days you may need to make special request to the institutions to please help you get a final invoice to NU within 45 days or earlier.

- Depts. should request subcontractors to send invoices earlier if they can. But if they need all 45-58 days we can work around it so long as the PI is available for signature and department can send the certified statement to ASRSP by day 58 (after the end date). So that GCFA can submit on time.

- Need to pay invoices no later than day 50-59 after the end date.

- There is discussion about whether in the final year of a project if subcontracts should be terminated earlier than the agreement in order to obtain reports and invoices.
  - This method will not work for salary recovery awards.
Recharge Centers

Recharge Center Owners

- Bill Monthly
- Have expense posted by the 15th of the proceeding month of service to allow for approval and posting on a grant
- Attach copies of invoices if you are sending items through the portal. We need to know what is being charged and why.
- Dates of service are REQUIRED.
  - NUCore awards are now showing this on statements
- If you notice a recharge service is missing call the center for assistance
- Notify the Recharge centers of a closeout, asking them to charge the services thru XX/XX/XX end date by bilateral date and then to start charging the new services to whatever chart string is going to pick up the services.
  - Ex: CCM services for grant ending in March. Contact Lot Bercasio
    - 610-5000000-60012345 closes 3/31/15. Please have all charges for March on the grant no later than May 15, 2015. Please begin to charge April 2014 expense to 110-5000000
What to do to Prevent Financial Losses?

• Begin planning for closeout when a budget is established.
  o Be aware of when your last days to post expenses are.
  o Have all expenses on the award 45 days in advance of the report deadline.
  o Manage awards on a monthly basis to help identify potential challenges early!

• Communicate with PI regularly

• Communicate with subcontractors regularly
  o Make sure they are billing us timely
  o Remind them of final invoice due date and request invoices be sent on TIME.

• If dept. can post all expenses **by the end date**, the 3 reports should definitely match. But that is hard if you have valid trailing expenses, therefore follow up will become very important
  o Charges incurred prior to the budget end date **MUST post** to the project within that 30-45 day window.
  o Keep an eye on most common late posting charges including travel, ProCard charges, subcontract invoices, recharge center expenses, contracted services forms. **Identify these early!** And follow up with getting them posted 30-45 days from the end date.

• Identify early on when a no-cost extension will be needed to complete the work.
  o Including work being done by a sub-contractor.
  o Remember to check if you can afford the effort before proceeding with a NCE
Certifications- Proactive Actions

• **Certified Budget statement**
  - Expenses on the Statement match what you want reported.
    - Upon close of a grant as soon as you are satisfied with expenses feel free to obtain the signature and submit to the GCFA.
      - Note: coordinate this with the GCFA so they have audited and made modifications to F & A if necessary.
  - Submitted to ASRSP in time for report
    - Day 46-80 after the end date is ideal time, but earlier is better!
    - Use Cognos to download your GM045 and submit it if you are ready anytime from day 0-89 after the end date
      - You know when your PI is available, if he/she is going on vacation you may need to get the grant as ready as possible and discuss with GCFA about how to proceed.

• **Program Income statement**
  - Can be found on ASRSP Website under Cash Management
  - Please forward anytime between day 0-89. Earlier is better

❖ Note that the earlier you send certifications, the more likely all reports will match and the sooner your GCFA can submit a report
Areas to watch out for

• PI leaves NU without a progress report or invention report completed can be problematic.
  ○ Have them provide OSR a copy to file

• Turn over/Medical Leave/Vacation of an RA or payroll staff: Decide how your department and school will deal with the absence and what is there to take care of immediately
  • Consider exit interviews to help transition the work to new staff or the substitute are in order to manage closeouts
  • Communicate who the new contact is for the award at your department to the GCFA
Final Action Day

Safe Zone
Maybe OK
Danger Zone – may not get reimbursed

Departments’ action time, period to charge modify and post changes
ASRSP’s Time to work on report and submit it
Government Agency Closeout
NSF Closeout

- National Science Foundation (NSF)
  - Award does not have the FCTR
  - Drawdown is reported by Individual award
  - NU is allowed to request funds in ACM$ up to 120 days after the end date *Only on awards that have an end date of 10/31/2014 and forward, otherwise 90 days.*
  - Area to watch out for: Just because the NSF may give NU more time, it is still recommended you focus all spending to no later than 45 days from the end date
    - Will close the grant in the 91st or 121st (whichever applies)
    - “Improper Payment Review” and “Adjustment to Close Award” Audits
Dept. of Defense (DOD)

- 2 types of Reimbursement methods (both are cost reimbursable)...
  - Invoicing – Majority of awards are billed by ASRSP
  - Scheduled (SCH): This means payment is made at milestones/deliverables

- Areas to watch out
  - DOD is watching spending trends.
    - If you are too slow or too fast they ask a lot of questions
    - Warned of spending cuts -- they cut the funding if the PI is not spending fast enough
    - Sometimes the funding expires **30 days** after the Grant Ends
      Financially DOD may not have 90 days for close out
Others

• NASA
  o Billed through PMS
  o Has an FCTR
  o Be ready before 90 day closeout

• Energy, DOE, HRSA other agencies
  o Be ready before 90 day closeout they don’t have 120 days
  o Some agencies will reject the FFR until expenses line up with FCTR. Rejected FFR prevents a department from asking for the carryover. We are not compliant with a rejected FFR.
  o Billing may not be PMS so be careful that means different rules.
We Can do it!

- Be your own Auditor, audit the awards when you reconcile so you catch things upfront.
- Reconcile Monthly to avoid problems
- Ask for help before problem gets out of hand
- Establish business practices at your school department/ lab to help manage issues or assistance
Consider this…

• How should ASRSP deal with cost overruns not cleared up after 60 days from the end date?
  o Currently there is a 30 day notification process. Watch for those emails

• Escalation emails – managers will be contacted if there is no reply to email requests. In some cases it may be necessary to inform the PI

• Department feedback on how we can assist you is important
Conclusion

• Majority of expenditures need to be on the grant by the end date

• Regardless of the federal Agency be ready for reporting as close to the grant end date as possible

• Subcontract Federal Flow thru awards (620 funds) may end earlier or be subject to short financial closeout period (such as 15-30 days from then end date) be ready!
HHS, NIH, and UG Policies & FAQ’s

NIH Updating Grant Closeout Policies and Procedures to Align with New HHS Requirements
NOT-OD-14-084

Grants Closeout FAQs
http://grants.nih.gov/grants/closeout/faq_grants_closeout.htm

Uniform Guidance FAQ
Special Thank You

Following staff for advice and input!

- Eskedar Alem, Sr. Research Administrator, IPHAM
- Eugenie Chao, Grant Officer
- Melody Delfosse, Information Manager, ASRSP
- Lauren Ellis, GCFA
- Janet Maher, Project Manager, ASRSP
- Jennifer Mitchell, Director of Cost Studies & Effort Reporting
- Jane Roy-Singh, Associate Director ASRSP
- Howard Ventura, Assist. Director, ASRSP