



Policy Brief

Last Revised: 10/22/2024

7.37 Sponsored Award Close Out Policy

Administering Department: Office of Research Administration/Research Grants & Contracts

Scope:

Summary

This policy addresses the management of award closeout related to sponsored award administration at Emory University. Award closeouts must be addressed in a timely, consistent fashion to ensure proper stewardship of sponsored award funds in accordance with regulations outlined in OMB 2 CFR 200 (Uniform Guidance) and other applicable sponsor requirements.

Applicability

This policy applies to all Principal Investigators (PIs) and research administrators responsible for the administration of sponsored programs at Emory University.

How to Comply with the Policy

To comply with this policy:

- It is Emory's policy that all sponsored award closeout deliverables are completed and submitted to sponsors in compliance with the sponsors' policies not to exceed 120 days. [2 CFR § 200.344 Closeout](#) and [2 CFR § 200.345](#) requires that final financial, performance, and other reports be submitted within 120 calendar days after the award end date.
- Funds may not be obligated after the termination date of the sponsored agreement, therefore any purchase orders for supplies, or other materials or services must be executed and received prior to the close of business on the final day of the award performance period (budget period) and be authorized, allowable, and necessary for the completion of the project.
- Expenses may not be applied to a sponsored account after Research Grants & Contracts has reviewed and reconciled the award without approval from RGC.
- Clinical trials are considered ready for close-out when no additional patients are being enrolled or in a follow-up period. The PI is responsible for notifying Research Administration Post Award when projects are ready to be closed out.

***A full list of conditions that must be met for an award to be considered institutionally closed out are outlined in the full policy.**

Noncompliance with the Policy

As part of the terms and conditions for sponsored awards, noncompliance with proper award close out may result in the corresponding Federal agency reporting the noncompliance. Subsequent consequences of noncompliance include but are not limited to:



- delay of award close out
- the Federal agency disallowing noncompliant costs, and/or
- the Federal agency withholding new awards or continued funding.