

The letters S, M, A, R, and T are arranged vertically. Each letter is enclosed in a circle. A dashed orange line connects the top of the 'S' circle, loops around the 'M' and 'A' circles, and ends with a downward-pointing arrowhead at the bottom of the 'T' circle. The background features a pattern of overlapping light blue and orange circles.

S
M
A
R
T

Strategies

Monitoring

Accountability

Risk Mitigation

Transparency

Closeout and Post Closeout

SMART 4.0

Hosted by the Office of Grants Management
Division of Compliance Assistance and Policy
Employment and Training Administration
U.S. Department of Labor.

SMART 4.0 Training Series

- The training modules are focused on: **S**trategies for sound grant management that includes **M**onitoring, **A**ccountability, **R**isk mitigation and **T**ransparency.
- **4.0 focuses on Risks Identification and SMART Practices!**

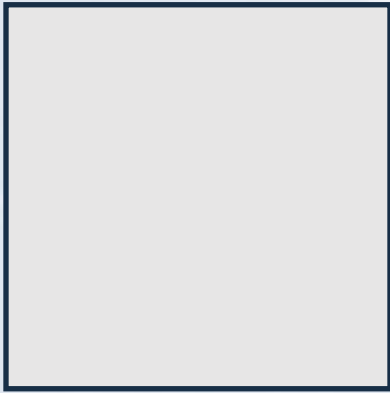


Disclaimer

SMART 4.0 is part of the catalog of SMART grant management tools. This conference and its materials should be viewed primarily as a support resource. It is not intended to be comprehensive but rather to provide an understanding of 2 CFR 200, 2 CFR 2900, and the management of ETA grants. The use of these SMART 4.0 modules does not ensure compliance. Any omission of an applicable Federal requirement does not waive a grant recipient or subrecipient's responsibility to comply with that requirement.

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Today's Speakers



First Last

Occupation/Title

Company Name



First Last

Occupation/Title

Company Name

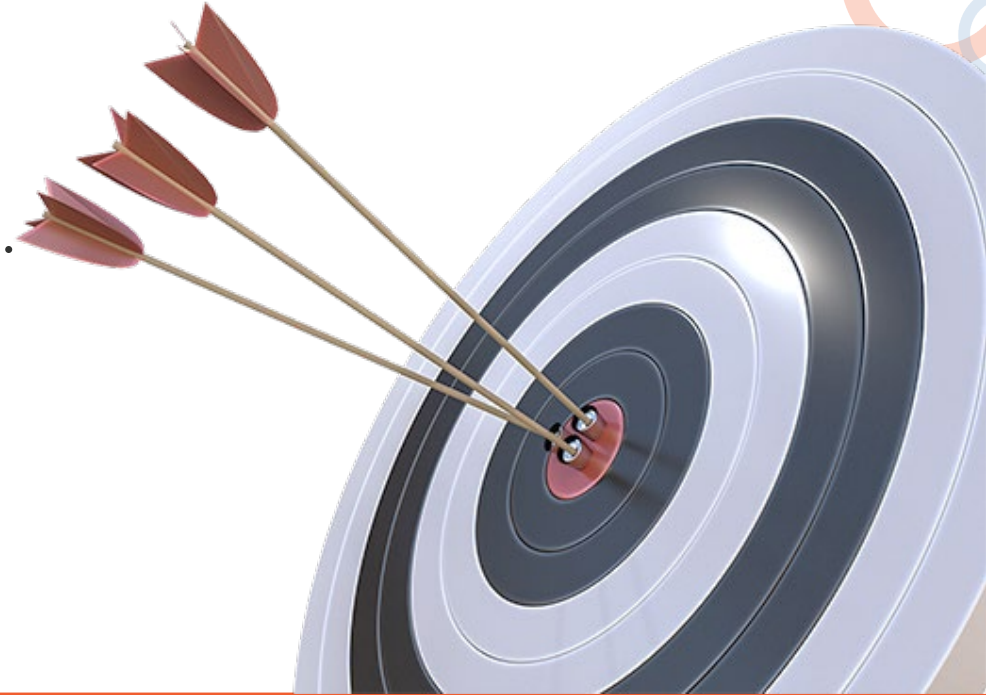
Module Overview

■ Closeout.

- Process – DOL-ETA with Award Recipients.
- ETA Closeout Package.
- Common Delay Issues.
- Process – Award Recipients With Subrecipients.

■ Post Closeout.

■ Risks and SMART Practices.



S
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Closeout



Process – DOL-ETA with Award Recipients

What is Grant Closeout?

[2 CFR 200.1](#)

- *Closeout* means the process by which the Federal awarding agency or PTE determines that all applicable administrative actions and all required work of the Federal award have been completed, and takes required actions described in [2 CFR 200.344](#).
- Completion of the grant life cycle.
- Official end of the grantor/grant recipient relationship.
- Closeout period:
 - For grants awarded **before** November 12, 2020; **90 calendar day** period following end of the grant's period of performance.
 - For grants awarded **after** November 12, 2020; **120 calendar day** period following end of the grant's period of performance.

Requirements

- [2 CFR 200.1](#) Closeout defined.
- [2 CFR 200.344](#) Closeout requirements.
- [2 CFR 200.345](#) Post Closeout adjustment.
- [2 CFR 200.346](#) Collection of amounts due.
- [2 CFR 2900.15](#) and [2 CFR 2900.17](#) Post Federal award requirements.
- WIOA.
 - [20 CFR 683.150](#) WIOA Closeout requirements.

What are the Required Closeout Actions?

2 CFR 200.344

- Federal agency.
 - Makes prompt payments to the grant recipient for allowable reimbursable costs.
 - Makes settlement for any upward or downward adjustments to the Federal share of costs.
 - Completes all closeout actions for Federal awards.
 - › **No later than one year after receiving and accepting all required final reports (Grants Oversight and New Efficiency Act - GONE Act 2016).**

<https://www.congress.gov/bill/114th-congress/senate-bill/1115>

DOL-ETA's Responsibilities

- **Track workload** one year out to ensure timeliness of closeout.
- **Notify the Authorized Representative** via email not less than 7 days prior to the grant's period of performance's end date.
- **Follow up** with grant recipient when delays are encountered.
- **Report** the grant recipient's failure to comply with the terms and conditions to OMB [2 CFR 200.344.\(i\)](#).
- **Impose conditions** on grant recipient for noncompliance [2 CFR 200.339](#).
- **Issue initial and final determinations** when disallowed costs are identified.

Closeout Process

Direct Grant Recipients.

- DOL email notifications to grant recipients, typically within 7 days before a grant expires.
- Closeout package emailed to the correct point of contact.
- Documentation within 90 calendar days of the end of the grant's period of performance (for awards made prior to 11/12/2020); within 120 calendar days for awards made after 11/12/2020).

TIP: Any Changes to the Authorized Representative must be made during the period of performance through a formal request to the FPO.

What are the Closeout Required Actions?

[2 CFR 200.344](#)

■ **Grant Recipient.**

- Submits all final required financial, performance, and other reports.
- Liquidates **all accrued expenditures** ([2 CFR 2900.15](#)).
- Refunds all unexpended funds.
- Accounts for real and personal property.

Liquidation of Accrued Expenditures

- No new obligations may incur after the grant's period of performance.
- The only liquidation that can occur during closeout is the liquidation of accrued expenditures (NOT obligations) for goods and/or services received during the grant period ([2 CFR 2900.15](#)).
 - All accrued expenditures must incur prior to the end of the grant's period of performance.
- Grant recipients may not direct charge staff time to work on the closeout of the grant after the period of the performance end date.

Grant Recipients Responsibilities (1)

- Negotiated Indirect Cost Rate Agreements (NICRAs) or Cost Allocation Plans (CAPs) must be provided at closeout if indirect costs are claimed.
 - All provisional rates must be finalized at closeout.
- Review of match requirements [2 CFR 200.1](#), [2 CFR 200.306](#), and [2 CFR 2900.8](#).
 - [2 CFR 200.306\(b\)](#) – funds used for cost sharing or match must have been reported and expended to further the grant objectives if required either by statute or within the grant agreement as a condition of funding.
- Match and leveraged resources must be reported throughout the performance of the grant and during closeout.

Grant Recipient Responsibilities (2)

- Monitor and track ALL grant-related expenditures.
- Timely submit program and financial reports.
- Maintain source documentation.
- Submit all appropriate documents to the Grant Closeout Specialist.
- Grant staff should be familiar with the grant's financial reporting and closeout requirements.
- Unless specifically allowed for by ETA, staff time incurred during closeout **can not** be charged to the grant.

Closeout Timeline

- Final quarterly ETA-9130 financial report due within **90 or 120 calendar days** after the grant's period of performance (POP) ends.
- ETA's Closeout Specialist sends follow-up reminder **70 to 75 calendar days** after the grant's period of performance's end date.
- All closeout documents are due no later than **90 or 120 calendar days** after the grant's period of performance's end date ([2 CFR 200.344\(a\)](#)).
- After the grant's period of performance ends, the Closeout Specialist reviews documents for compliance.

Closeout Timeline Example

September 30, 2023

- Grant expires, closeout begins.

January 30, 2024

- Final quarterly ETA-9130 due.
- Last day to draw down funds.
 - Requests after that time must be made through the OGM closeout unit.

ETA Closeout Package

ETA Closeout Package

Required Documents to be submitted	Formula	Competitive
Final ETA-9130 Financial Report.	X	X
Government Property Closeout Inventory Certification provide list of inventory, if applicable.	X	X
Grant recipient's detailed statement of cost.		X
Approved and negotiated indirect cost rate agreement or CAP.	X	X

**ETA will no longer use the Grant Closeout System (GCS)
after April 2023. GrantSolutions will be used starting May 2023.**

Final 9130 Report

Final 9130 Report is required for closeout.

- Report submitted at the end of the final quarter.
- Report indicates that “yes” in line-item box 6, this is a final report.
- Submitted after the reporting period in which the grant period of performance expires, or all funds are expended, whichever comes first.

NO More Closeout 9130 Report

- Only the Final 9130 is needed for Closeout.

- ETA-9130 Financial Report Forms and Instructions may be found at:

<http://www.dol.gov/agencies/eta/grants/management/reporting>

- PMS Helpdesk at:

<https://pms.psc.gov/support/help-desk.html>.

At the end of a grant, Final 9130 report must be submitted:



For grants awarded **before November 12, 2020**, the Final Financial 9130 report must be submitted no later than 90 calendar days after the expiration of the grant period of performance.

For grants awarded **on and after November 12, 2020**, the Final Financial 9130 report must be submitted no later than 120 calendar days after the expiration of the grant period of performance.

The closeout package will be emailed to the grant recipients within 7 days of the period of performance end date.

Examples of due dates for Final Financial Reports are:

	Grant POP	All Funds Expended or POP Expired	Final Reporting Quarter End Date	Final Report Due Date
Awarded Before 11/12/2020 (90 Days)	07/1/17 – 09/30/20	09/30/2020	09/30/2020	12/30/2020
Awarded On or After 11/12/2020 (120 Days)	12/01/2020 – 09/30/2023	9/30/2023	9/30/2023	1/30/2024

*Grant recipients may request a closeout package early if all monies are expended prior to the end of the POP.

For more information regarding grant closeout, please visit

<https://www.dol.gov/agencies/eta/grants/management/closeout>.

FINAL 9130 Report only

Beginning April 2023, recipients **must** submit the **Final** 9130 report

in the Payment Management System (PMS).

Existing and active grants have a PMS account already.

New grant recipients must request access as a “new user” and update user permissions available at: <https://pms.psc.gov/grant-recipients/user-access.html>.

Property Certification Form

- Certifies that the grant number listed has attached:
 - A property inventory list with a unit fair market value of \$5,000 or more where DOL reserves the right to take the title.

OR

- That no government property with a current per unit fair market value of \$5,000 or more was purchased.
- Contains the signature of the Authorizing Grant Official and date.

Detailed Statement of Costs Form

- Exhibits how costs are spent per category.
- Example of cost categories:
 - Salaries and Wages.
 - Fringe Benefits.
 - Travel.
 - Supplies.
 - Contractual.
 - Indirect Costs.
- Costs approved in the initial grant award or recent modification must be consistent with the last approved budget.

Indirect Costs – Approved NICRA or CAP

- Submit final and approved NICRA and/or CAP.
- Only required for award recipient with more than one Federal source of funds.
- Outline costs tied to all indirect cost rates and/or cost allocation plans:
 - Have **been approved** in advance and receive final approved rates before closeout.
- Indirect costs are **accurately charged** and **reported** in accordance with the approved plan.

Have indirect costs been reported on the FINAL 9130 form?

Common Delay Issues

Common Issues

- Outdated point of contact information.
- Inconsistencies between amounts of cash receipts, cash disbursement and federal share of expenditures.
- Indirect cost not based on the approved NICRA or CAP.
- Exceeding the administrative cost limitations.
- Unresolved questioned costs and disallowed costs.
- Not meeting the match requirement.
- Failure to report program Income.
- Delaying submitting request for Budget Realignment.

Administrative Costs Closeout Example

Refer to your program regulations on your program's administrative threshold.

Federal Expenditures and Unobligated Balance.

- d. Total Federal funds authorized. \$1,310,603.00
- e. Federal Share of expenditures. \$1,245,153.14
- f. Total administrative expenditures. \$122,434.14**
- g. Federal share of unliquidated obligations. \$0.00
- h. Total Federal obligations (sum of lines e and g). \$1,245,153.14
- i. Unobligated balance of Federal funds (line d minus h). \$65,449.86



Be mindful of
the specified
limitation for
administrative
costs.

Match

- Match – Portion of project costs not covered by Federal funds.
 - [2 CFR 200.1](#) and [2 CFR 200.306](#).
 - [2 CFR 2900.8](#) – Match must be **expended** before it is counted as a match to fulfill a match requirement.
- Must be spent on allowable grant activities to fulfill the objective or goal of the program or project.
- If required match is not met:
 - Federal share is proportionally reduced.
 - Shortfall may be subject to debt collection and affect future award potential.

Program Income

WIOA Sec.194(7)(B), WIOA [20 CFR 683.200\(e\)\(8\)](#), and [2 CFR 200.307](#).

ALWAYS expend program income prior to requesting more Federal funds.

- Income generated from allowable grant activity must be reported.
- Interest income earned on Title I of WIOA and the Wagner-Peyser Act program income must be expended first before drawing additional grant funds.
- If unused, it must be returned/refunded to the DOL at closeout.

Budget Realignment in Closeout

DO NOT WAIT UNTIL CLOSEOUT, BUT IF YOU MUST...

- Grant recipient must provide written justification to Federal Project Officer (FPO).
- FPO determines if appropriate.
- FPO sends justification to ETA Closeout Specialist and documented in the file.



Check Your Knowledge in 60 Seconds

Answer True or False:

1. All recipients have 90 days from the end of the POP to submit the final ETA-9130 report.
2. Any program income unspent at the end of the POP must be returned to DOL at closeout.
3. If a grant recipient provides at least 90% of its required match by the end of the POP, the grant recipient has complied with the match requirement.





Process – Award Recipients with Subrecipients

What are the Required Closeout Actions?

[2 CFR 200.344](#)

■ PTEs must:

- Request all final and closeout required reports.
- Make prompt payments to the subrecipient for allowable reimbursable costs.
- Liquidate all accrued expenditures ([2 CFR 2900.15](#)).
- Account for real and personal property.
- Make settlement for any upward or downward adjustments to the Federal share of costs.
- Complete all closeout actions for Federal awards no later than one year after receiving and accepting all required final reports.

Pass-Through Entity Responsibilities

- PTE establish closeout procedures for subrecipients to ensure successful subaward closeout process.
- Ensures subrecipients can meet the closeout requirements timely manner. **PTEs must:**
 - Finalize all indirect costs issues timely.
- Ensure access rights to subaward information for DOL-ETA and OIG continues after closeout of subaward.



Closeout – Subaward Procedures

- Identify each step in the closeout process and assign specific staff responsibilities.
- Deadlines for closing out subawards (no later than 90 calendar days) are incorporated into subawards.
- Notifications for submitting final invoices are sent to subrecipients.
- Limits cash advances to amounts based on need and ensure subrecipients is on a reimbursement basis for payments.
- Request and review of equipment purchased after the award.

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Post Closeout

Closeout Does Not Affect DOL Authority

- Disallowances.
- Debts.
- Access to Records.
- Property Management.
- Audit.
- Refunds.

AUTHORITY

Federal Debt Collection

2 CFR 200.346

- Federal debt collection provisions.
 - Debt established in Management Decision (final determination) payable in 30 days.
- If not paid within 90 days Federal awarding agency may reduce the debt by:
 - Making an administrative offset,
 - Withholding advance payments, or
 - Taking other action permitted by Federal statute.
- Interest charged on the overdue debt.
 - Date interest begins not extended by litigation/appeal.
 - https://www.fiscal.treasury.gov/fsreports/rpt/cvfr/cvfr_home.htm.
- Waiver of liability (rare).
- U.S. Treasury may offset the uncollected debt against any source.

WIOA Special Provisions

- Waive the imposition of sanctions.
 - A waiver of the recipient's liability must be considered by the Grant Officer only if it meets any of the events outlined in 20 CFR 683.730(c).
- Offset/Deduction.
 - The Grant Officer may determine that a debt, or a portion thereof, may be offset against future allotments to the recipient ([20 CFR 683.750](#)).

Waiver (1)

WIOA sec.184(d)(3) and [20 CFR 683.730](#).

- Applicable to Title I WIOA for both competitively-awarded and formula grant recipients.
- Waiver requests related to debt established during the recipient's resolution process of a finding at the subrecipient level must be accompanied by a copy of the audit resolution document(s) or a resolution report.
- Waiver requests during ETA's audit resolution period must be made during the informal resolution timeframe.
- Waiver requests are subject to approval by the DOL Grant Officer.

Waiver (2)

- [WIOA](#) sec.184(d)(2).
- Approval of waiver requests is subject to:
 - Documentation to demonstrate substantial compliance with the following requirements of [WIOA](#) sec.184(d)(2);
 - › Having a proper monitoring system for subrecipients or contractors.
 - › Having a clear written agreement/contract with the subrecipient or contractor.
 - › Taking actions to monitor the subrecipient or contractor.
 - › Taking corrective actions upon discovery of findings.

Waiver (3)

- The Grant Officer must consider waiver requests only if misexpenditures are not due to willful disregard of the requirements of WIOA and regulations, fraud, gross negligence, failure to observe accepted standards of administration, or a pattern of misexpenditure.

Offset (1)

20 CFR 683.750

- Applicable to Title I WIOA and Wagner-Peyser funds.
- State written request.
- Offset only if misexpenditures are not due to:
 - Willful disregard of the requirements of WIOA and regulations.
 - Fraud.
 - Gross negligence.
 - Failure to observe accepted standards of administration.
 - A pattern of misexpenditures.

Offset (2)

20 CFR 683.750

- Debt offset against amounts allotted to the recipient.
 - Recipient-level disallowed expenditures offset against recipient administrative funds.
 - › Debt not fully satisfied until the Grant Officer reduces the amounts allotted.
- Still must expend at the level demanded by the allotment.

Refunds

2 CFR 200.344(d)

- Grant closeout does not affect grant recipients' obligation to return funds to DOL as a result of refunds.
- Prompt refund of any balances of unobligated funds is required.
- Refunds may require revising the final expenditure report.
- Refunds can be processed electronically through Payment Management System (PMS) or [Pay.Gov](#).

Pay.gov

- Reliable, safe, and convenient.
- Payments deducted directly from the account of payment date.
- Reduces processing requirements and mitigates lost or stolen checks.
- Eliminates costs of a paper check system.

<https://www.pay.gov/public/form/start/177233981>

The screenshot displays the Pay.gov website interface. At the top, the Pay.gov logo is on the left, and 'Sign In' and 'Create an Account' links are on the right. Below the header, a navigation bar contains links for 'Browse Payments', 'See All Agencies', 'Help', and 'About Us'. The main content area is titled 'DOL ETA General Payments'. A horizontal progress bar shows five steps: 1. Before You Begin (highlighted in blue), 2. Complete Agency Form, 3. Enter Payment Info, 4. Review & Submit, and 5. Confirmation. Below the progress bar, the 'Accepted Payment Methods:' section lists: Bank account (ACH), Amazon account, PayPal account, and Debit or credit card. At the bottom of this section are two buttons: 'Preview Form' and 'Cancel'. To the right of these buttons is a large blue button labeled 'Continue to the Form'. A small circular icon with a blue arrow is visible in the bottom right corner of the page.

Sustainability After Closeout (1)

Recipients' sustainability plan should identify the following:

- Clear vision for the program with a focus on where your program can have a meaningful impact.
- Specific goals and objectives, including those working directly with participants to those working behind the scene in different offices.
- Strategies for implementation, including policies, activities, and future partnerships.

Sustainability After Closeout (2)

The following are steps to consider when identifying ways to sustain the program services previously provided under the Federally funded award:

- **Evaluate past results.**

- Identify what worked and what did not.

- **Incorporate lessons learned into ongoing service delivery.**

- Identify what part of the program can be implemented in the future and what cannot.

Sustainability After Closeout (3)

Additional steps to consider:

- **Identify funding sources.**

- Grant recipients should pursue all possible funding sources to support the continuation of program services.

- **Build stronger relationships with established partners.**

- Continue to support program partners.
- Engage with program partners in areas that support your organization's mission.
- Share resources.



Risks and SMART Practices

Common Risks (1)

Grant recipient.

- Late bills/requests for grant reimbursement submitted by the grant recipient after the closeout deadline.
- Inadequate accounting for property and its disposition.
- Missing government inventory list form at closeout.
- Match requirements not reported on the grant recipient's financial reporting form or the designated report form.
- Recipient not obtaining a final indirect cost rate at closeout, still using a provisional rate.
- Incurring costs after the period of performance and award expires.

Common Risks (2)

Pass-through entity.

- Failure to make prompt payments to the subrecipient for allowable reimbursable costs.
- Failure to establish closeout process for subawards.
- Not notifying subrecipients on closeout deadlines.
- Not accounting for equipment purchased by the subrecipient.

SMART Practices (1)

Grant recipient.

- Prior to closeout, the grant recipient should ensure that the FPO or GO is provided advance notice of any issue or possible grant or budget modification.
- Review match requirement to ensure that it is reported on your 9130.
- Reporting on program income for all ETA program grants.
- Make all cash drawdowns before the closeout documents are submitted.

SMART Practices (2)

Pass-through entity.

- PTE should provide timely notification to contractors and subrecipients that final invoices must be submitted.
- Develop or update procedures to conduct timely closeouts with subrecipients.
- Limit cash advances to subrecipients near the end of the subaward period.
- Place the subrecipient on a reimbursement basis for payments.
- Require subrecipients to submit a list of equipment purchased under the subaward.

Questions?



Testing For Compliance – Core Monitoring Guide

ETA monitoring aims to assess compliance using the Core Monitoring Guide (CMG). Here is a list of indicators that were discussed during the module's topic.

■ **Objective 2.a.3: Closeout Requirements.**

- The grant recipient has an adequate system in place to manage the grant/project, including any specific award conditions, project modifications, and closeout requirements.
 - › Indicator 2.a.3: Closeout Requirements.

Closeout and Post Closeout Resources

■ [Core Monitoring Guide PDF](#)

■ Department of Labor Exceptions [2 CFR Part 2900](#)

- 2 CFR 2900.8
- 2 CFR 2900.9
- 2 CFR 2900.10
- 2 CFR 2900.15
- 2 CFR 2900.17

[https://www.congress.gov/
bill/114th-
congress/senate-bill/1115](https://www.congress.gov/bill/114th-congress/senate-bill/1115)

■ WIOA Provisions [20 CFR Part 683](#)

- 20 CFR 683.150
- 20 CFR 683.200
- 20 CFR 683.730
- 20 CFR 683.750

■ [Uniform Guidance Crosswalk PDF](#)

■ Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards [2 CFR Part 200](#)

- 2 CFR 200.1
- 2 CFR 200.306 – 2 CFR 200.308
- 2 CFR 200.339
- 2 CFR 200.344 – 2 CFR 200.346

Thank You!