# **Recipient Closeout**

Tribal Broadband Connectivity Program (TBCP) I and II



#### **Policy Disclaimer**

This document is intended solely to assist recipients in better understanding the Tribal Broadband Connectivity Program (TBCP) and the requirements set forth in the Notice of Funding Opportunity (NOFO) for this program. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFO, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.

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# **Closeout Process and Timeline**

#### **Common Closeout Process Questions**

#### What is closeout?

• The process by which the National Telecommunications and Information Administration (NTIA) and National Oceanic and Atmospheric Administration (NOAA) determine that the recipient has completed all applicable administrative actions, and all required work associated with its award.

#### How long is the closeout period?

120 calendar days after the end of a recipient's period of performance.

#### What happens during closeout?

• Recipients submit all final grant documentation. They also work with their Federal Program Officer (FPO) and Grants Management Specialist (GMS) to verify that all award conditions have been satisfied.

#### What do subrecipients (not contractors or consultants) have to do during closeout?

• Subrecipients must submit all closeout reports to the pass-through entity (recipient) no later than 90 calendar days after the period of performance end date for their subaward.

#### How to Request an Extension to the Closeout Period?

- Can I request an extension to the closeout period?
  - Yes, recipients can request an extension to the 120-calendar day closeout period (and must justify that request). Extensions to closeout can be requested for up to 90 calendar days.
  - When should I request an extension to my closeout period?
    - Recipients must request an extension to their closeout period within the 120-day closeout period.
       Requests after that period are rarely approved.
  - How do I request an extension to my closeout period?
    - Recipients will submit a Revision Request: Extension to Closeout via the Status Module in eRA.
- How do I know if I received an extension to closeout?
  - eRA Commons will notify the recipient of the approval or rejection of their request.

#### **Preparing for Closeout**

As recipients prepare for closeout they should:

1

Discuss the closeout process and period of performance end date with their FPO.

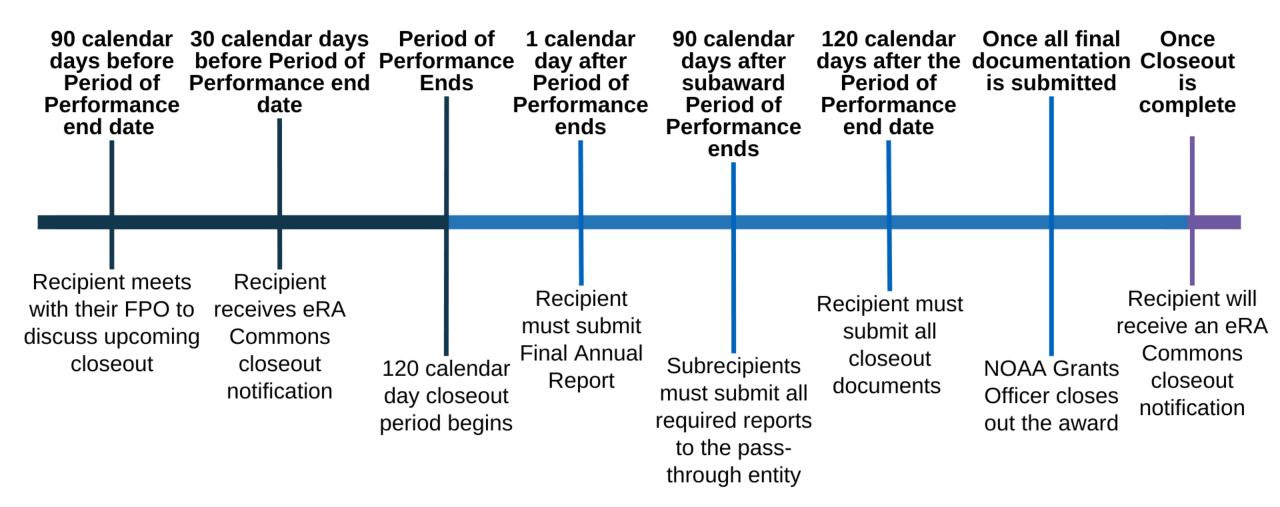
2

Verify that all funds
necessary for project
completion will
be committed to a
programmatic activity by
the period of performance
end date.

3

Verify that all project activities will be completed by the period of performance end date.

#### **Closeout Timeline**



# **Timeline of Responsibilities**

Recipient/Subrecipient	Timeline	
Recipient requests an extension to the period of performance, if needed.	90 calendar days before period of performance end date	
If no extension is requested, recipient meets with their FPO to assess outstanding Standard and Specific Award Conditions and financial and programmatic responsibilities.	90 calendar days before period of performance end date	
- Period of Performance Ends -		
Subrecipients submit all required reports (all financial, performance, and other reports as required by the terms and conditions of the Federal award per <u>2 CFR § 200.344</u> ) to the pass-through entity.	Up to 90 calendar days after period of performance end date of the subaward	
Recipient submits all closeout documents. Per <u>2 CFR § 200.344</u> , NOAA may extend the closeout period if the recipient requests and justifies the extension.	Up to 120 calendar days after the period of performance end date	



# **Early Closeout**

# **Early Closeout**

- What are the requirements for closing out early?
  - Recipients must first discuss early closeout with their FPO and GMS.
  - Recipients must also complete all project goals prior to their period of performance end date to request an early closeout.
- What is the timeline for closing out early?
  - Recipients must submit an early closeout request in eRA Commons <u>at least</u> one <u>quarter in advance</u> of their current period of performance end date.

# **How to Closeout Early?**

- Once the recipient has discussed early closeout with their FPO and GMS and they
  agree that an early closeout is appropriate, the recipient may submit a
  "Termination by Consent" RR in eRA Commons.
  - The "Revision Request: Termination by Consent" in eRA Commons must include a
    written request for termination on Tribal letterhead, signed by the recipient's
    Authorized Organization Representative (AOR). The letter must contain the
    desired date of termination.
- Once approved, the early termination will amend the official period of performance end date to the new requested end date.

# **Closeout Requirements**

#### **Closeout Requirements**

TBCP recipients must follow the closeout requirements under <u>2 CFR § 200.344</u>. These requirements include:

Refunding any
Unobligated Cash
Balances

Submitting all Financial and Performance Reports

Liquidating all Financial Obligations

Accounting for Real and Personal Property

# **Closeout Documentation**

#### **Closeout Documentation Overview**

Document Type	Applicable to
Final Performance (Technical) Report	All TBCP recipients
Final Annual Report	All TBCP recipients
Form SF-425 (Final Federal Financial Report)	All TBCP recipients
Form SF-428 ( <u>Tangible Personal Property Report</u> )	All TBCP recipients must complete the cover page. Recipients with equipment/supplies of \$5,000 (TBCP I) or \$10,000 (TBCP II) or greater to report must complete the entire form.
Form SF-428-B ( <u>Tangible Personal Property Report Final</u> Report)	All TBCP recipients.
Form SF-428-S ( <u>Tangible Personal Property Report</u> <u>Supplemental Sheet</u> )	TBCP recipients with equipment/supplies of \$5,000 (TBCP I) or \$10,000 (TBCP II) or greater must complete this report.
Form SF-429 (Real Property Status Report)	All TBCP recipients must complete the cover page. Recipients that acquired or improved real property with TBCP funds must complete the entire form.



# Final Performance (Technical) Report (FPR)

TBCP recipients must submit a final Performance (Technical) Report that is <u>cumulative</u> of the entire period of performance.

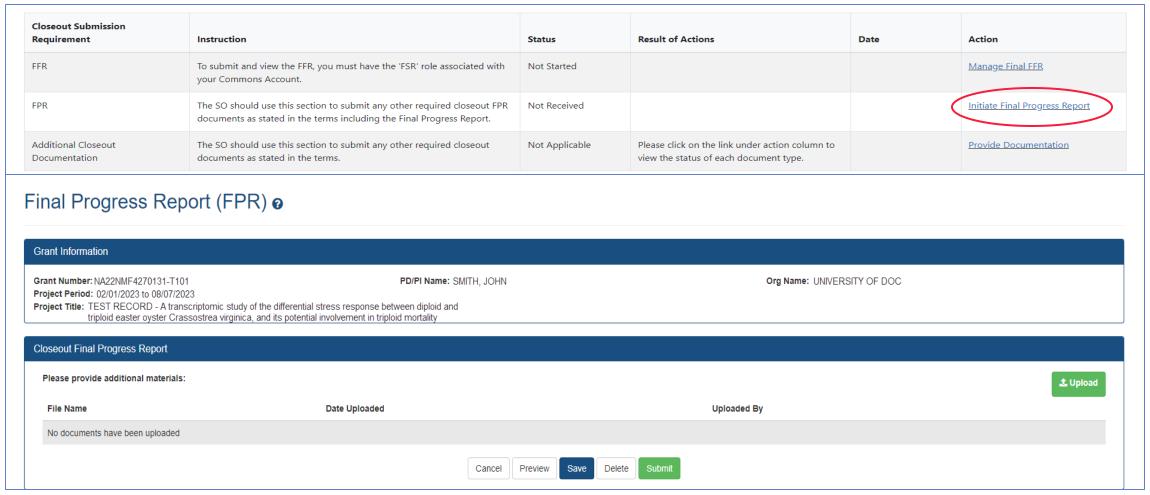
- You will receive the final Performance (Technical) Report template via email from <a href="mailto:tbcp@ntia.gov">tbcp@ntia.gov</a>.
- The "Final Report" question is marked "Yes" automatically.
- Infrastructure Deployment recipients must report final upload and download speeds in Section 14.
- A conformed signature is acceptable on the FPR.

OMB Control No. 0660-0047 Expiration Date: 07/31/2025 TRIBAL BROADBAND CONNECTIVITY PROGRAM PERFORMANCE (TECHNICAL) REPORT GENERAL INFORMATION Recipient Organization: Award Identification Number: Report Submission Date Recipient Street Address: (MM/DD/YYYY): City, State, Zip Code: Final Report: JEI Number: Period of Performance End Date Period of Performance Start Date (MM/DD/YYYY): (MM/DD/YYYY): Report Period Start Date Report Period End Date (MM/DD/YYYY): (MM/DD/YYYY):



#### Final Performance (Technical) Report

 Submit the final Performance (Technical) Report in the eRA Commons Grant Closeout Module as a Final Progress Report (FPR). Only the Signing Official (SO) can submit.





#### **Final Annual Report**

Recipients must submit a final Annual Report that is <u>cumulative</u> of the entire period of performance.

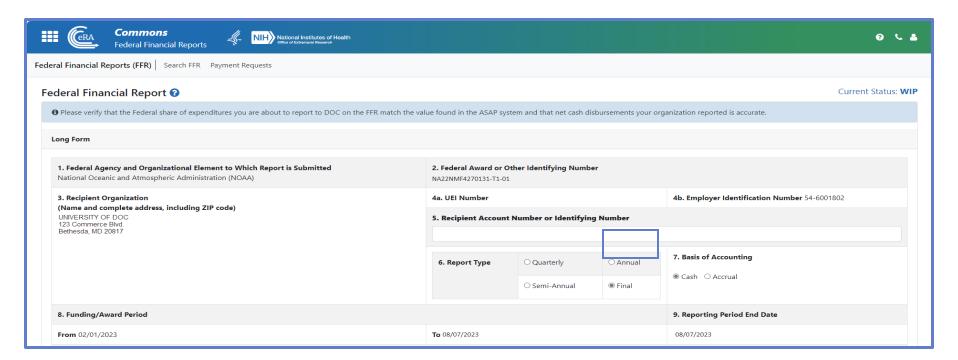
- The Final Annual Report is due one day after the period of performance ends.
- The Final Annual Report is submitted as an "Other" type Revision Request.
- A conformed signature is acceptable on the final Annual Report.

Infrastructure Deployment recipients must list the final Tribal Households, Businesses, and Community Anchor Institution locations connected to broadband with TBCP funds in Addendums A-C.

#### Final Federal Financial Report (SF-425)

Recipients complete the Final Federal Financial Report (FFR) within eRA Commons.

- The final FFR is cumulative and should include all financial transactions that occurred during the life
  of the award, including any closeout costs.
- In question 6. Report Type, recipients should check the box for "Final".
- The FFR requires a wet signature. Conformed signatures will not be accepted.





# **Tangible Property Overview**

### What is Tangible Property?

Tangible Property is made up of equipment and supplies.

#### What qualifies as equipment?

Equipment is tangible personal property with a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000 (TBCP I) or \$10,000 (TBCP II), and that has a useful life of more than one year. See definition of equipment in 2 CFR § 200.1.

#### What qualifies as supplies?

Supplies are tangible personal property other than those that fall within the definition of equipment. *See* definition of supplies in 2 CFR § 200.1.

#### **Common Equipment Questions**

TBCP-funded property ideally remains in use for its estimated useful life for the purposes under which it was acquired during the award.

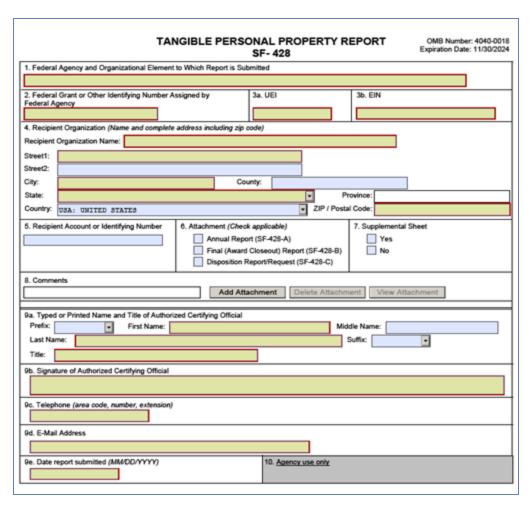
- Can equipment continue to be used following closeout?
  - Recipients may continue to use TBCP-funded equipment for the purpose of their award throughout the useful life of the property if it is used in a way that was allowable under the award.
- What if equipment is no longer needed and will not be used?
  - Recipients should coordinate disposition of the equipment with the NOAA Grants Office.
- What to do with TBCP-funded property that was replaced or upgraded?
  - The recipient must request permission from the Grants Office to dispose of the replaced equipment.

#### **Common Supplies Questions**

- What should recipients do with residual inventory of unused supplies?
  - If the residual inventory has an aggregate value of \$5,000 (TBCP I) or \$10,000 (TBCP II) or greater at closeout, then the recipient may:
    - 1. Use the supplies on another Federally-sponsored project or program,
    - 2. Dispose of those supplies and compensate NTIA for its Federal share of sale proceeds, or
    - 3. Retain the supplies for the recipient's non-Federal use and compensate NTIA for the Federal share of the current market value of the supplies (see <u>2 CFR § 200.314(a)</u> for the calculation methodology).
  - If the residual inventory has an aggregate value of less than \$10,000, then the recipient should request disposition instructions from NOAA.
- Can supplies continue to be used following closeout?
  - A reasonable amount of undeployed supplies may be retained to support the maintenance of TBCP-funded facilities.
  - Further use of undeployed supplies is only permitted to complete previously approved TBCP routes and only if used in a way that was allowable under the award.
  - The use of TBCP-funded supplies beyond these limited parameters may be subject to disposition requirements.

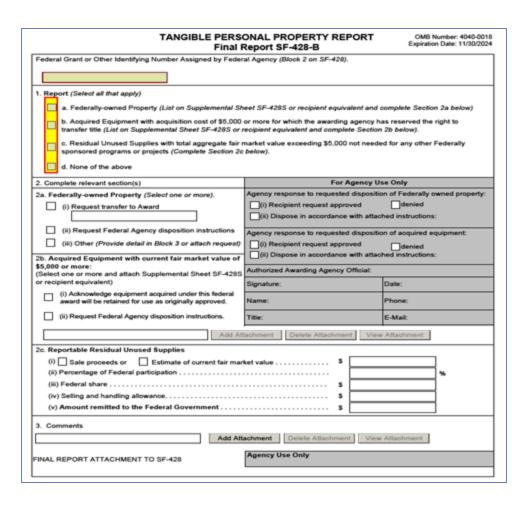
# **Tangible Property Reports**

# **SF-428 (Tangible Personal Property Report)**



- Who must complete this form?
  - All TBCP recipients.
- What is this report used for?
  - This report collects information related to tangible personal property (equipment and supplies).
- Where do I find this report?
  - All tangible property report forms can be found on grants.gov.
- How should the SF-428 be signed?
  - NOAA requires a wet signature. Conformed signatures will not be accepted.

# Report SF-428-B (Tangible Personal Property Report Final Report)

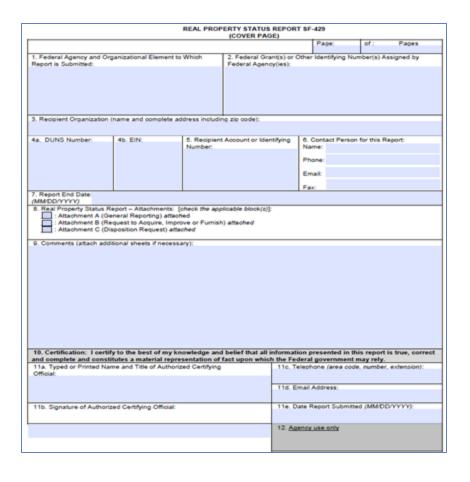


- Who must complete this form?
- All TBCP recipients.
- What is this report used for?
  - This report collects information related to the tangible personal property a recipient has at the time of report closeout.
- Where do I find this report?
  - All tangible property report forms can be found on grants.gov.



# **Real Property Reports**

# SF-429 (Real Property Report)



#### Who must complete this report?

 All recipients must complete the cover page. Recipients that acquired or improved real property (a piece of land that has been enhanced or modified through construction, renovation, or other development activities using federal funds) with TBCP funds must complete the entire form.

#### What is this report used for?

- Attachment A: To report real property status.
- Attachment B and C: To request agency instructions on real property that was/will be provided as Government Furnished Property (GFP) or acquired (i.e., purchased or constructed) in whole or in part under a Federal financial assistance award.

#### Where do I find this report?

- This report form can be found on grants.gov.
- How should the SF-429 be signed?
- NOAA requires a wet signature. Conformed signatures will not be accepted.

# **Billing and Deobligation**

#### **Billing and Deobligation**

#### What costs are allowable during closeout?

- Only reasonable, necessary, allowable, and allocable administrative award closeout costs are authorized during the 120-day closeout period. These costs may include:
  - Costs related to accounting and reporting;
  - Paying final invoices (the activities must have occurred during the period of performance to be allowable).
- The recipient and their subrecipients and contractors cannot charge for work conducted or incur programmatic costs for Federal reimbursement after the period of performance end date.

#### What qualifies as closeout activities?

- Closeout activities are typically limited to the preparation of final performance, financial, and required project audit reports, unless otherwise approved in writing by the Grants Officer.
- Costs associated with closeout are considered administrative expenses.

#### **Two Percent Cap on Administrative Costs**

- Does the two percent cap on using grant funds on administrative expenses apply to closeout?
  - Yes, costs associated with closeout are considered administrative expenses.
  - For this purpose, the two percent limitation on administrative expenses includes the combined total of indirect costs and direct administrative costs charged to an award.
- How do recipients calculate this?
  - Recipients must ensure that the total costs incurred as indirect costs, plus the total costs incurred as direct administrative costs, do not exceed two percent of the grant amount, regardless of any previously approved indirect cost rate the recipient and/or subrecipient(s) may have negotiated with a cognizant Federal agency.
- How does NTIA enforce the 2 percent cap?
  - A recipient's failure to abide by the two percent cap on administrative costs will lead to the disallowance of award costs by the Grants Officer and may require the recipient to return a portion of the federal award funding to NTIA. See 2 CFR § 200.346.

Total indirect costs incurred



Total direct administrative costs incurred



More than 2% of grant amount

#### **Deobligation**

#### When should recipients stop drawing down funds?

Before the 120-day closeout period ends, the recipient must request all final costs through the
Automated Standard Application for Payment (ASAP). The final FFR must reflect all expenditures, so it is
recommended that recipients make their final drawdown as soon as possible to allow for more time to
complete the final closeout reports.

#### When will the award be closed out?

NOAA will deobligate any remaining funds and close out the award after the final reports are submitted.
 Once the funds are deobligated, they will not be legally available for incurring new obligations.

#### What happens after the award has been closed?

• When the award closes, no further transactions will be permitted, and no reports may be submitted or replaced. Upon closeout completion by the NOAA Grants Officer, eRA will send a letter letting the recipient know all requirements have been satisfied and the award is closed.

# **Record Retention**

#### **Record Retention**

#### What records should be retained?

 Recipients are required to retain <u>certain documentation</u> pertinent to their TBCP award in accordance with 2 CFR § 200.334.

#### How long should records be retained?

Recipients should retain the requisite documentation for a period of three years. The
retention period starts the day the recipient submits their final financial report.
Supporting documentation, financial records, and other documents may be subject to
future review.

#### • Are there any exceptions?

• In cases where litigation, claims, or an audit is initiated prior to the expiration of the three-year period, records must be retained until completion of the action and resolution of any issues associated with it or the end of the three-year retention period, whichever is later.

#### **Record Retention Continued**

For best practice, documentation that TBCP recipients should retain after closeout includes but may not be limited to:

Record Retention Documents	
Award Package	Final Closeout Letter
Financial Records	Record of Reconciliation
Evidence of Program Accomplishments	Property Disposition Forms
Written Determinations and Preapprovals between NOAA/NTIA and TBCP Recipient	Programmatic Reports: Baseline, Performance (Technical), and Annual
Records Supporting All Cost Charge to the Award	Audit Follow-Up Records
Procurement records	Monitoring Records

Subawards Issued by the Recipient and All Documentation Supporting the Management and Oversight of the Subawards



# Resources

# **Closeout Terms and Definitions**

Term	Definition
Closeout Documents Due Date	The closeout documents due date occurs 120 calendar days after the period of performance end date. The date is listed in the NOAA closeout letter.
Closeout Letter	The closeout confirmation letter is the letter from NOAA to the recipient confirming the award has been closed.
Closeout Period	The closeout period is a 120-day window, which begins immediately following the period of performance end date, during which the recipient must submit all required documentation, perform any final financial accounting of the award, and receive final review by NTIA and NOAA.
Period of Performance End Date	The period of performance end date is the last day of the recipient's award period as modified by the most recent Notice of Award (NoA).

#### **Additional Closeout Resources**

Resource	Link
2 CFR Part 200.344 Closeout	TBCP I: <a href="https://www.ecfr.gov/on/2020-11-12/title-2/part-200/section-200.344">https://www.ecfr.gov/on/2020-11-12/title-2/part-200/section-200.344</a> TBCP II: <a href="https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR682eb6fbfabcde2/section-200.344">https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR682eb6fbfabcde2/section-200.344</a>
TBCP Standard and Specific Award Conditions	Refer to your Notice of Award (NoA) in eRA Commons.
DOC Financial Assistance Standard Terms and Conditions	TBCP I, dated November 12, 2020: https://www.commerce.gov/sites/default/files/2020- 11/DOC%20Standard%20Terms%20and%20Conditions%20-%2012%20November%202020%20PDF_0.pdf TBCP II, dated October 1, 2024: https://www.commerce.gov/sites/default/files/2024- 09/DOC%20Financial%20Assistance%20General%20Terms%20and%20Conditions%20as%20of%2001%20 October%202024.pdf
Broadband USA Website	https://broadbandusa.ntia.doc.gov/resources/grant-programs/tribal-broadband-connectivity-program
TBCP Closeout Guidance	See Section 5 for Record Retention requirements: <a href="https://broadbandusa.ntia.gov/sites/default/files/2024-07/TBCP_Closeout_Guidance_070124.pdf">https://broadbandusa.ntia.gov/sites/default/files/2024-07/TBCP_Closeout_Guidance_070124.pdf</a>



# Thank You