



CLOSING A PROJECT

PUBLIC

TELECOMMUNICATIONS

FACILITIES

PROGRAM



Closing A Project

Introduction

This section reviews preparation of the documents you must submit to close out your PTFP grant and gives you information about additional requirements.

Deadlines: All Close-Out documentation must be submitted within 90 days of the completion of the grant project or the expiration of the Grant Award Period, whichever comes first. Failure to submit your Close-Out within the 90-day period puts your project out of compliance with the terms and conditions of the award and can result in termination of the award, establishment of an Account Receivable for all Federal funds disbursed for the award, and denial of future grants to your organization.

How to Submit Close-Out materials: Most Close-Out documents can be prepared and submitted online in the PTFP Online Reporting and Tracking System - PORTS. If you prefer, you may prepare and submit your Close-Out on paper. If you choose paper submission, you must submit an ORIGINAL and ONE COPY OF ALL DOCUMENTS, with the full grant number (e.g., 99-99-N99999) on each document.

Also, if you choose paper submission, you should be aware that anything sent via the United States Postal Service — including “overnight” and “Express Mail” — is subject to delivery delays of up to two weeks because of mail security procedures at the Department of Commerce. We urge you to consider sending your documents by other means.

Construction Grant Close-Out Requirements

Page 3

Planning Grant Close-Out Requirements

Page 19

You may request a printed copy of the close-out requirements from PTFP.

Please contact your Program Officer if you have any questions about closing your grant. The name of your Program Officer is listed in the Special Award Conditions of your grant award document (CD-450).

Construction Grant Close-Out Requirements

All construction grant close-outs require at least three elements to be submitted to PTFP — **Certification** that the project has been completed satisfactorily and insurance coverage obtained, a **Final Inventory** of all equipment acquired as part of the grant project, and a **Priority Lien** on all equipment in the project. If additional documentation is required, PTFP will let you know.

Contents

Where to Send Close-Out Documents	4
Certification	5
Final Inventory	5
• Sales Taxes, Shipping, Installation & Other Costs	6
• Preparing the Inventory	7
• Total Project Cost	7
• Sample Final Inventory	8
Priority Lien	9
• Uniform Commercial Code (UCC) Forms	9
• Completing the UCC Form	9
• Filing the Lien	10
Additional Requirements and Information	11
• Labeling Equipment	11
• Insurance Coverage	11
• Audits	11
• FCC Documents	12
• Site Rights	12
• Review of Close-Out Documents	12
• The Federal Interest Period	13
Annual Status Report	14

Where to Send Close-Out Documents

Your PTFP Program Officer should be the initial contact for all programmatic aspects of closing out your grant award. All construction grant projects require submission of a **Priority Lien** as part of the Close-Out. The lien documents can be submitted as an attachment to a Close-Out submitted through PORTS or on paper. Some states permit electronic filing of liens. If that is true in your state, you must submit proof of the filing to PTFP as part of your Close-Out. Paper submissions of lien documents should be addressed to:

[Program Officer's Name]
NTIA/PTFP
Room 4812
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

If you are submitting your Close-Out in hard copy, the following documents should also be sent to the above address:

Certification of Completion and Insurance Coverage
Final Inventory

As noted, the name of your organization's PTFP Program Officer is listed in the [Special Award Conditions of your grant award document](#).

The National Institute of Standards and Technology (NIST), Grants & Agreements Management Division, (NIST) is the Commerce Department's Federal Grants Office and is responsible for all **administrative and financial reporting** aspects of closing out your grant award. The name of your organization's Grants Office Specialist is listed in the Special Award Conditions of your grant award document. The reports you must submit to the Grants Office at close-out are:

The final Financial Status Report (SF-269)
Request for Advance or Reimbursement (SF-270), if not already submitted
Cash Transaction Report (SF-272)

They should be addressed to:

[Grant Specialist's Name]
National Institute of Standards and Technology
Grants & Agreements Management Division
100 Bureau Drive, Mail Stop 1650
Gaithersburg, MD 20899-1650

(Note that the Priority Lien documents must be reviewed and approved first by PTFP and then by NIST **before they are filed**. Please see the discussion of liens below.)

Certification

The first item that must be included in your close-out documentation is certification that the project has been completed and that all of the terms and conditions of the award have been complied with.

The certification may be completed online in PORTS or submitted as a letter addressed to William Cooperman, Director, Public Broadcasting Division and showing your full grant number (e.g., 99-01-N99999). The letter should be signed by the same person who signed the Financial Assistance Award (Form CD-450) to accept the grant or by that person's successor or superior. The letter should certify specifically that your organization has:

- ✓ complied with all of the terms and conditions of the grant;
 - ✓ acquired all of the facilities specified in the grant and that they have been installed, are in operating order, and being used to provide public telecommunications services in accordance with the project as approved by NTIA;
 - ✓ obtained any FCC authorizations necessary to operate the project apparatus;
 - ✓ obtained and will maintain adequate insurance to protect the Federal interest in the event of loss through casualty;
 - ✓ acquired any necessary site rights required for the project; and
 - ✓ attached a complete and accurate final inventory of equipment and final accounting of all project expenditures.
- ☞ Please submit **two** copies of the certification if you are submitting your Close-Out on paper.

Final Inventory

You must submit a final inventory of **all** equipment (whether bought or donated) that is acquired as part of your PTFP-funded project. The inventory you submit will be compared with the equipment list approved as part of the Grant Award, along with any amendments **approved in writing by PTFP** during the project period.

The inventory may be completed online in PORTS or submitted on paper. If you submit your close-out in PORTS, you will need one hard copy of the completed inventory to attach to the lien. If you submit your close-out on paper, you will need three (3) copies of the completed Final Inventory: one to attach to the lien and two to include with the other documents.

The Final Inventory must include the following information for each item of equipment:

- ✓ a brief description of the item (e.g., "color camera", "CD player", "audio production console", "master control switcher");
- ✓ the make and manufacturer's model number;

- ✓ manufacturer's serial number;
- ✓ the inventory number that your organization has assigned to the item (this number and the last five digits of the NTIA/PTFP grant number must both be on a label attached to the item);
- ✓ the quantity purchased of each item;
- ✓ the per-unit cost of the item, if applicable; and
- ✓ the total price of the item.

Taxes, Shipping, Installation, and Other Project Costs

Sales taxes and reasonable shipping charges may be claimed for equipment approved for a PTFP project. (Some states waive sales taxes if payment for the item includes Federal funds.) Labor costs for project equipment installation can be claimed only when authorization was included in the award document or in an amendment approved in writing by PTFP.

Sales Tax

- * Sales tax charges are usually included in the cost of an item.
- * When many items are purchased on a single invoice or purchase order, the sales taxes may be shown as a separate entry to cover that group of equipment items.
- * Sales taxes charged may be grouped and listed as a single item at the end of the equipment list, when appropriate.

Shipping

- * Shipping charges are usually included in the cost of an item.
- * When many items are purchased on a single invoice or purchase order, the shipping charge may be shown as a separate entry to cover a group of equipment items.
- * Shipping charges may be grouped and listed as a single item at the end of the equipment list, when appropriate.

Installation

- * A number of small hardware items that do not relate to any one single item may be grouped in the inventory under a heading such as "Miscellaneous installation hardware" as long as it is made clear what sort of items make up the "miscellaneous" grouping.
- * We repeat: installation labor costs can be claimed **ONLY WHEN AUTHORIZATION WAS INCLUDED IN THE FINANCIAL ASSISTANCE AWARD DOCUMENT OR IN AN AMENDMENT APPROVED IN WRITING BY PTFP.**
- * Installation labor costs - when allowed - should be organized by payee and reported in the same detail as equipment.

Other Project Costs

- * Other project costs can be claimed only when authorization was included in the

Financial Assistance Award document or in an amendment approved in writing by PTFP.

* Other project costs - if authorized - should be arranged by payee and reported in the same detail as equipment items.

Preparing the Final Inventory

Please provide a heading that includes the name of your organization and the complete NTIA/PTFP grant number (e.g., 99-01-N99999). Please repeat the heading on each page of the inventory and number the pages.

The Final Inventory list itself should be divided in half vertically, as shown in the example below. The left-hand side should reproduce the equipment list from the award document; the right-hand side should show what was actually acquired.

Each major item of equipment should be listed separately. In deciding what to include as major inventory line items, you should strike a balance between encompassing too much in a single entry (e.g., "six microwave hops...\$360,000") and breaking entries down into unmanageable detail (e.g., "twelve wing nuts...\$1.19).

Minor equipment items, however, may be included in the cost of the major item to which they relate. You should note what sub-items are included in the total item cost. Any item that requires its own inventory number should be listed separately on the Final Inventory.

You should include a brief explanation of any aspect of the Final Inventory that is unusual and might, therefore, be questioned.

Total Project Cost

The total amount of the Final Inventory (including sales taxes, shipping, installation charges, and any other approved project costs) must be the same as the total reported on the final Financial Status Report (SF-269) submitted to NIST.

Note: Equipment lists will not be amended retroactively as part of closing out a grant in order to cover items purchased without prior written authorization from PTFP.

SAMPLE FINAL INVENTORY

Anytown State University										
Station WPS										
Anytown, State										
NTIA/PTFP Grant No. 99-99-N99999										
Approved Equipment List					Purchased Equipment List					
Description	Manufacturer, Model	Qty	Cost	Manufacturer, Model	Serial No.	Inventory No.	Qty	Unit Cost	Price	
CATEGORY A - DISSEMINATION EQUIPMENT										
FM transmitter	Connors 25 kw xmtr w/spare	1	\$71,519	Warriner xmtr AT 25kw	AT25-20045	99999-203	1	\$69,778	\$69,778	
FM transmitter	Mellone 4-bay antenna	1	14,000	Mellone 4-bay antenna	67893	99999-202	1	15,432	15,432	
Transmission line	Harland heliax and hangers	500'	12,000	Chadwick heliax and hangers	n/a	n/a	365'	22	8,030	
Installation			8,000	Cooperman Techworks Co.	n/a	n/a	1 lot	8,342	8,342	
CATEGORY B - ORIGATION EQUIPMENT										
Reel-to-reel ATR	Sheppard Studio 524	2	11,780	DELETED, PER AMENDMENT 11/30/20XX						
RDAT ATR	Dyer RDAT 342X (PER AMENDMENT 11/30/XX)	2	8,490	Sanders RD-1230	SRD-0897	99999-200 99999-201	2	4,245	8,490	
Audio console	Stewart ND-101 w/mon amp	1	20,000	Hallock STU-322	STU-68943	99999-204	1	19,836	19,836	
Cabinet	Custom-built for console	1	3,000	Rivera Woodworks, Inc.	n/a	99999-205	1	2,413	2,413	
APPROVED TOTAL PROJECT COST			\$148,789	ACTUAL TOTAL PROJECT COST					\$132,321	

Priority Lien

The Federal government retains a priority reversionary interest in all equipment you acquire as part of the project. The Federal interest extends from the initial receipt of the equipment through a ten-year period after the project is completed. This interest is secured through a lien document.

You may have been required to file an initial lien at the start of your Grant Award Period. This lien may have been revised to reflect amendments to your approved equipment list during the Grant Award Period. Regardless of the number of liens you may have filed during the Grant Award Period, you are required to submit a completed lien form as part of closing out your grant. The lien must cover all equipment included in the grant. This is done by attaching a copy of the approved Final Inventory to the lien form and incorporating it into the lien by reference (see below).

It would be premature for you to submit a fully-recorded final lien with the close-out documents, because PTFP has to approve the final inventory attached to the lien and NIST must approve the form before it is recorded. *Even if the lien form in your state does not require signatures, you must submit the form with a copy of the final inventory attached for PTFP and NIST approval before you file it.*

Uniform Commercial Code (UCC) Forms

Most grantees use UCC (Uniform Commercial Code) forms for the final lien. In some states a chattel mortgage is used. UCC forms differ slightly from state to state. They are usually available from an attorney, from a bank's loan department, or from an office supply store. In some states, the forms are available online.

Completing the UCC Form

Whether the lien submitted with the close-out is your first or not, follow the guidelines below for completing the form.

- (1) Enter your organization's name and address as the "Debtor".
- (2) Enter the following in the section for the "Secured Party":

NTIA/PTFP
Room H-4812
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

- (3) In the section designated for the description of the items covered by the lien, enter the following:

This financing statement covers all equipment purchased under National Telecommunications and Information Administration Grant No. *[enter complete grant number; e.g., 99-99-N99999]* A copy of the project's equipment list is attached and is incorporated into this lien by reference. The term of this priority lien shall extend for a period of ten years following *[fill in the project expiration date or the date on which project completion is certified if the project is completed before the end of the Grant Award Period]*, during which time the Federal Government retains a priority reversionary interest in the equipment on the attached list.

- (4) The lien document should be signed as the "Debtor" by the official of your organization authorized to sign liens, if a signature is required, and sent to PTFP as part of the package of close-out documents. **Attach a copy of the final inventory of equipment submitted for PTFP review to the lien form.**

Please send an **original** and one **photocopy** of the lien form to PTFP.

Filing the Lien

After review by NTIA/PTFP, NIST will sign the lien form for the "Secured Party," if a signature is required, and return it to you with instructions to file it at the recording office specified by your state's law. If your state requires liens to be filed in more than one recording office, be sure you prepare the appropriate number of forms to send to PTFP. (Note that the lien form must be sent to PTFP **before** you file it, even if your state's form does not require the Secured Party to sign it.)

Once filed, a copy of the filed lien, *with the recording office stamp clearly visible*, must be returned promptly to:

[Grants Specialist's Name]
National Institute of Standards and Technology
Grants & Agreements Management Division
100 Bureau Drive, Mail Stop 1650
Gaithersburg, MD 20899-1650

Additional Requirements & Information

Labeling Equipment

You must mark permanently **all** equipment included in the project to ensure accurate identification and accurate reference to inventory records in the event of an inspection or audit. Even if your organization does not normally assign inventory numbers to items costing under a specific dollar amount, you still must assign inventory numbers to all equipment items for NTIA's purposes.

A non-removable label (or other means of identification) should be attached to the equipment where it can be seen easily. The label should contain your organization's inventory number plus the last five digits of the NTIA/PTFP grant award number.

Transmission antennas should be assigned an inventory number. The number should be posted in the transmitter shelter with an appropriate identification.

Insurance Coverage

Your organization must have insurance so that, in the event of loss, you will be able to replace equipment promptly. The insurance must protect the funded equipment from common hazards (fire, theft, etc.). Flood insurance must be carried in a community where such insurance is available when the grant-funded equipment is to be located in an area that has been identified by the Federal Emergency Management Agency as having special flood hazards.

You do **not** have to provide a certificate from your insurance company or risk manager. Instead, you must certify that your organization has – and will maintain – the required coverage. The insurance certification is part of the close-out certification.

Audits

If your organization expends more than \$500,000 in Federal funds - from all Federal sources, not just PTFP - in a one-year period, you must have an audit performed in accordance with Federal guidelines as stated in OMB Circular A-133, dated June 30, 1997 (If you do not have a copy, you can get one by going to www.whitehouse.gov/omb and clicking on Circulars.)

These audits are performed in one of two ways. An *NTIA/PTFP-specific audit* may be performed if your organization receives Federal funds only from NTIA. If your

organization receives funds from more than one Federal source during the year for which the audit is conducted, an *organization-wide audit* must be performed. (Note that CPB funding is not considered a Federal source.)

If an allowance for audit costs was included in your Grant Award, the audit report must be submitted prior to the deadline for submitting the close-out documentation in order for the cost to be charged to the grant.

Questions about audits should be addressed to your Grants Specialist at NIST.

FCC Documents

If you have already supplied FCC authorizations to NTIA/PTFP to fulfill a Special Award Condition, you need not resubmit the documents as part of the Close-Out. Your Program Officer will let you know if additional FCC documents are required.

Site Rights

If you have already supplied the necessary opinion letter to NTIA/PTFP to fulfill a Special Award Condition for site rights, you need not re-submit it as part of the Close-Out. Your Program Officer will contact you if additional material is required.

Review of Close-Out Documents

NTIA/PTFP reviews all close-out documents to be sure that the project was completed in accordance of the terms and conditions of the award. The program may request clarification or revision of material submitted in your package of close-out documents. Your prompt response will assist in the timely completion of the close-out process.

All grant recipients should be aware that failure to provide additional requested close-out information in a timely manner can result in

- * the establishment of an Account Receivable for all Federal funds paid to your organization and
- * the denial of future grants to your organization.

Final Inventory

Items included on the final inventory and not approved for purchase in the Financial Assistance Award document or in a subsequent amendment will be removed from the final approved inventory. This may result in a requirement to refund Federal funds already paid to your organization.

It is worth repeating something said earlier: **inventories will not be amended retroactively as part of closing out a grant in order to cover items purchased without prior written authorization from PTFP.**

The Federal Interest Period

Your responsibility to the Federal government through the Department of Commerce does not end when the Grants Office informs you that your close-out has been completed. This section summarizes some of the requirements imposed on grantees in the years after a grant is closed out.

Retention of Records

Federal regulations require that your organization keep financial records, supporting documents, statistical records, and all other records pertaining to the grant project for three (3) years after your final financial status report **has been accepted**. If any litigation, claim, or audit is started before the expiration of the three-year period, all records must be kept until all litigation, claims, or audit findings involving the records have been resolved. Grant recipients must keep the following records intact and accessible for inspection at any time:

- (1) A complete and itemized inventory of all public telecommunications facilities under the control of the grantee, whether or not financed, in whole or in part, with Federal funds;
- (2) Complete and current financial records that fully disclose the total amount of the project; the amount of the grant; and the amount, nature and sources of all non-Federal funds associated with the project; and
- (3) All records specified in Office of Management and Budget Circular A-110 (for educational institutions, hospitals, and non-profit organizations) and 15 CFR Part 24 (for state and local governments).

Project equipment must be marked in a permanent manner to assure easy and accurate identification and reference to inventory records. The marking must include the PTFP grant number and a unique inventory number assigned by the grantee.

Inspections

Grantees must permit inspections at any time during normal business hours by NTIA and the Comptroller General of the United States, or their authorized representatives, of the public telecommunications facilities acquired with Federal financial assistance and of any books, documents, papers, and records relating to those facilities.

Annual Status Reports

Organizations that have received **construction grants** from NTIA/PTFP are required to submit an Annual Status Report for every grant project that is in the Federal interest period. By statute, this is the 10-year period during which the Federal government retains a reversionary interest in all equipment purchased under the project. The Federal interest period begins with the project completion date, as established by NTIA/PTFP during the close-out procedure.

Annual Status Reports are due on or before April 1 in each of the ten years of a grant's Federal interest period. They may be prepared and submitted online in PORTS. If you prefer, your report may be submitted on paper in the form of a letter identified as an Annual Status Report in a conspicuous space at the beginning with the full PTFP grant number (e.g., 99-99-N99999). If you have more than one grant to report on, when submitting on paper, you may submit a single report as long as it shows clearly the full grant number of each award you have in the 10-year Federal interest period.

In the Annual Status Report, the grant recipient must certify:

- That it remains an eligible entity, as defined in the PTFP Rules.
- That it continues to use the equipment purchased under the grant for the original purposes of the grant.
- That it continues to possess all FCC authorizations necessary for the project.
- That all equipment purchased under the grant continues to be protected by adequate insurance coverage. [Note: You are not required to submit a certificate from your insurance carrier or risk manager.]
- That it remains in compliance with all of the terms and conditions of the grant. The terms and conditions are found in Part V of the application form,

"Assurances" (contained in Attachment B for applications filed during FY 88-90). Beginning with the FY 1988 grant awards, these assurances are fully incorporated into the Financial Assistance Award document as the grant's terms and conditions at the time the grant is awarded.

- That no significant changes have occurred during the reporting period with respect to any of the terms and conditions of the grant. Or that changes have occurred. (For example, has the recipient experienced any significant change in its corporate structure?) Any such changes must be reported.
- The recipient must provide information as to whether any discrimination complaints are pending against it and whether any recent adverse judgments have been rendered against it because of discriminatory practices. If a discrimination complaint is pending, the recipient should provide a brief description of the complaint and its status. If any adverse judgment has been rendered, the recipient should summarize that judgment and describe what affirmative action has been taken or is being taken to remedy the effects of the adjudged discrimination.
- If the recipient is a state or municipal agency, non-profit institution, or a college or university, then discrimination complaints and recent adverse judgments must be reported for the entire organization **-not just for the radio or television station**. However, state or municipal agencies should report discrimination complaints/adverse judgments only for the agency that actually receives the Federal grant money, not the entire state or municipal government.
- **IF THE RECIPIENT IS AN ACADEMIC INSTITUTION**, it must certify that the institution will not discriminate in its admissions policies nor in the opportunities it affords to persons to participate in the receiving or providing of services. This certification is applicable to the entire academic institution, not just to the entity (usually, as noted above, a radio or TV station) that was the subject of the grant.

The Annual Status Report should be signed by an official of the recipient organization who is legally authorized to make such certifications for it. In a college or university, this is often the president or the head of the grants and contracts office. A nonprofit institution will often have its president sign.

Annual Status Reports should be sent to the following address:

William Cooperman, Director
Public Broadcasting Division
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, N.W, Room H-4812
Washington, D.C. 20230

Sample Annual Status Report Letter

William Cooperman
Director
Broadcasting Division
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, N.W, Room 4812
Washington, DC 20230

Subject: Annual Status Report: April 1, 20XX - March 31, 20XX
PTFP Grant #99-99-N99999
Station KBBB-TV
Eastern State University
Anytown, State 00000

Dear PTFP Director:

With respect to the above-referenced grant, we hereby certify the following:

- That Eastern State University remains an eligible entity as specified in the PTFP Rules and Regulations.
- That the equipment purchased under the grant continues to be used for the original purposes of the grant.
- That Station KBBB-TV continues to have all FCC authorizations necessary for the grant project.
- That all equipment purchased under the grant continues to be protected by adequate insurance coverage.
- That Eastern State University remains in compliance with all the terms and conditions of the grant.
- That no changes have occurred during this reporting period with respect to any of the terms and conditions of the grant.

Sincerely,
Thomas A. Anyone
President

Continuation of the Lien

PTFP construction grant recipients are required to take steps to ensure that the Federal government's position as primary secured creditor is fully protected for the entire 10-year period of Federal interest. This protection is secured by a lien document, generally a UCC-1 financing statement, the final version of which is recorded during the grant close-out procedure.

Many states, however, do not extend such protection through the Federal interest period under a single lien document. In those states, continued protection is secured by recording a continuation statement. Recognizing the need for and recording of continuation statements is your responsibility. ***If you are located in any state except those listed below, you must continue to protect the Federal interest by filing a continuation of the final lien at the appropriate interval(s).***

All states require renewal of the lien after five years, with the following exceptions:

Arizona	6-year term
Maryland	12-year term
Tennessee	20-year term
Louisiana	no time limit
Puerto Rico	no time limit
Guam	NTIA has no information
American Samoa	NTIA has no information

Recognizing the need for, preparing, and recording continuation documents is your responsibility. To help you with this, we suggest that you enter the date the lien was recorded ("stamped") on the checklist that follows.

Checklist for Federal Interest Period
--

Grant Award Number: _____
 Beginning of the 10-year Federal interest period: _____
 Date Final Lien filed: _____
 Lien expiration date: _____
 Certified copy to NIST: _____
 Lien continuation filed: _____
 Copy sent to PTFP: _____

Annual Status Report Filings

	DUE	SENT
First year	April 1, 20_____	
Second Year	April 1, 20_____	
Third Year	April 1, 20_____	
Fourth Year	April 1, 20_____	
Fifth Year	April 1, 20_____	
Sixth Year	April 1, 20_____	
Seventh Year	April 1, 20_____	
Eight Year	April 1, 20_____	
Ninth Year	April 1, 20_____	
Tenth Year	April 1, 20_____	

NOTICE

We have estimated that each response to this collection of information will take on average 24 hours for construction grant recipients to prepare the certification of completion, final inventory, and final lien. Our estimate includes the time to read the instructions, look through existing records, gather the required data, and complete and review the response. If you have any comments on this estimate or how we can improve the collection and reduce the burden it causes you, please write to the Office of Policy Coordination and Management, NTIA, Room 4892, Department of Commerce, Washington, DC 20230. Your comments will also be accepted via the Internet if you send them to. You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice.

OMB Approval No. 0660-0001. Expires September 30, 2009

Revised 10/22/2007

Planning Grant Close-Out Requirements

All planning grant Close-Outs require at least three items — a **Certification** that the project has been completed satisfactorily, a **Final Report** of the planning activities undertaken, and a **Report of Project Expenditures**. Copies of any planning studies and reports must also be submitted. If additional documentation is required, PTFP will let you know. The details of preparing the elements of your Close-Out and other important information are listed below.

	Page
Where to Send Close-Out Documents	19
Certification	20
Final Report for a Broadcast Planning Project	21
Final Report for a Nonbroadcast Planning Project	22
Report of Project Expenditures	24
Audits	24
Review of Close-Out Documents	25
Post-Grant Requirements	25

Where to Send Close-Out Documents

Your PTFP Program Officer should be the initial contact for all **programmatic aspects** of closing out your grant award. The name of your organization's PTFP Program Officer is listed in the Special Award Conditions of your grant award document. The reports and other documents you submit to NTIA/PTFP at close-out are:

- Certification of Completion
- Final Report
- Report of Project Expenditures
- Copies of Planning Studies and Reports

They should be addressed to:

[Program Officer's Name]
NTIA/PTFP
Room 4812
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

The National Institute of Standards and Technology, Grants and Agreements Management Division, (NIST) is the Commerce Department's Federal Grants Office and is responsible for all **administrative and financial reporting** aspects of closing out your grant. The name of your organization's NIST Grants Specialist is listed in the Special Award Conditions of your grant award document. The report you should submit to NIST at close-out is the:

The final Financial Status Report (SF-269)

It should be addressed to:

(Grants Specialist's Name)
National Institute of Standards and Technology
Grants and Agreements Management Division
100 Bureau Drive, Mail Stop 1650
Gaithersburg, MD 20899-1650

Closing Out Planning Grants

Certification

The first item in your package of close-out documents must be a certification that your organization has completed the project. The certification should be in the form of a letter addressed to the William Cooperman, Director, Public Broadcasting Division, and must show your full grant number (e.g., 99-01-N99999). The letter should indicate that your organization has:

complied with all of the terms and conditions of the grant;

- # completed the planning process; and
- # conducted the planning process consistent with the goals and objectives contained in the Financial Assistance Award document.

Final Report for a Broadcast Planning Project

Your Final Report may be submitted through PORTS as an attachment to your certification. If you submit your Close-Out on paper, please submit **two copies** of the Final Report. It should contain the following elements:

1. An executive summary covering the major findings and conclusions.
2. A detailed explanation of the planning process you used.
3. A detailed discussion of the results and conclusions of the planning process. The Report should answer the following questions, as given in PTFP's guidelines for preparing broadcast planning project applications:
 - a. What will be the mission/purpose of the station? How was that decided?
 - b. What types of station ("Alternative Technologies") were considered – Low-Power FM, full-power AM or FM, repeater with local origination capability? What are the pros and cons for each type in your situation? Which type did you choose? Why?
 - c. Will the station be built by and licensed to your organization or another organization? If the latter, the Final Report should document that the organization is (i) eligible to apply for and receive a Construction Permit for the proposed station from the Federal Communications Commission (FCC), and (ii) committed to the construction and long-term support and operation of the station.
 - d. If the proposed licensee is not experienced in broadcasting, what source of broadcast expertise will the licensee have available to assist it in the operation of the station?
 - e. How will the licensee oversee the operation of the station? Will the station have an advisory board or committee? How will its members be chosen? Is there to be any participation by the general public?
 - f. What financial resources will be available to support the cost of (i) constructing the proposed station and (ii) the long-term operation of the completed station? Documentation – with dollar-commitment estimates, even if conditional – from possible supporters of both types of expense should be included with the Final Report.
 - g. Have sites been found for studios, offices, the transmitter, and a tower? Does the proposed licensee own them or will it buy or lease them? If the latter, does it have a commitment from the present owner(s) to sell or lease? If sites have not been found, what is being done to find them?
 - h. What engineering resources will be available for (i) the construction of the proposed station and (ii) the long-term maintenance of station

equipment for its operation and continued useful life?

- i. What staffing plans have been developed? How many and which positions will be paid? How many and which will be volunteer positions? Will there be any student positions? How many and in what capacity? If experienced professionals will not be hired, how will the staff be trained?
 - j. What programming plans have been developed?
 - k. What evidence is there that the population of the expected coverage area is interested in the proposed station?
 - l. What evidence is there that other organizations in the coverage area would welcome the station and see it as a potential aid to their work? Have they pledged any type of support?
 - m. If you requested Priority 1A or 1B for your project, is the proposed coverage area currently unserved by a public radio or television station?
 - n. If you requested Priority 4A for your project, will the proposed station address underserved needs in the projected coverage area in a way that significantly differentiates its service from what is already available?
 - o. When will an application for a Construction Permit be submitted to the FCC?
4. The following should be attached to your Final Report:
- a. copies of all studies developed as part of the planning process;
 - b. a list of all meetings held as part of the planning process, showing who attended and the results of the meeting; and
 - c. copies of all engineering studies and FCC applications, if any, generated by the project.

Note: If your planning effort leads directly to a PTFP construction grant application, copies of the planning Final Report (minus the attachments) should be included as one of the application's optional exhibits. In addition, the construction application Project Narrative should summarize the planning effort and its major results. Also, other sections of the construction application should make prominent reference to the planning (e.g., the discussion of financial qualifications should thoroughly discuss the project funding plans).

It should also be noted that it is perfectly acceptable for a planning grant project to conclude that a station should not be constructed.

Final Report for a Nonbroadcast Planning Project

Your Final Report may be submitted through PORTS as an attachment to your certification. If you submit your Close-Out on paper, please submit **two copies** of the Final Report. It should contain the following elements:

1. An executive summary covering the major findings and conclusions.
2. A detailed explanation of the planning process you used.
3. A detailed discussion of the results and conclusions of the planning process. The Report should address the following important issues, as outlined in PTFP's guidelines for preparing nonbroadcast planning project applications:
 - a. What the comprehensive needs assessment determined.
 - b. The precise goals and objectives for the proposed nonbroadcast system, flowing from the needs assessment.
 - c. What types of nonbroadcast technical systems ("Alternative Technologies") were considered – T1, satellite distribution, ITFS, other microwave? What are the pros and cons for each type in your situation? Which type have you selected? Why?
 - d. Project staffing. If your project is for distance learning, you should have determined how many staff would have to be dedicated to the proposed system in order to operate, maintain, and administer it. Staff training also fits under this heading. You should show how you intend to provide sufficient – and continuing – training to the faculty who will be using the system, either as teachers or as mentors.
 - e. What sort of advisory group is desirable to ensure that the nonbroadcast distance learning system will continue to serve the needs of its users? How will it be formed?
 - f. What sources of funding will be available for two purposes: (i) to provide the non-federal share of a PTFP project implementation proposal, if relevant, and (ii) to support the eventual nonbroadcast system adequately over the long term?
 - g. If Federal Communications Commission authorization is required to construct your facility, when will an application for a Construction Permit be submitted to the FCC?
4. The following should be attached to your Final Report:
 - a. copies of all studies or reports developed as part of the planning process;
 - b. a list of all meetings held as part of the planning process, showing who attended and the results of the meeting; and
 - c. copies of any engineering studies and FCC applications generated by the project.

Note: If your planning effort leads directly to a PTFP construction grant application, copies of the planning Final Report (minus the attachments) should be included as one of the application's optional exhibits. In addition, the Project Narrative should summarize the planning effort and its major results. Also, other sections of the construction application should make prominent reference to the planning (e.g., the financial qualifications should thoroughly discuss the project funding plans).

It should also be noted that it is perfectly acceptable for a planning grant project to conclude that a facility should not be constructed.

Report of Project Expenditures

You must submit a detailed final Report of Project Expenditures. The report should be arranged in the same format as the approved budget contained in the Financial Assistance Award (CD-450), and it should show the payees in each budget category. Brief explanations should be provided for any aspect of the expenditures that is unusual and might, therefore, be questioned. Your report may be submitted through PORTS as an attachment to your certification. If you submit your Close-Out on paper, please submit **two copies** of the report of the project expenditures.

The total expenditures reported must equal the total project cost reported on the final Financial Status Report (SF-269) submitted to NIST.

Audits

If your organization expends more than \$500,000 in Federal funds - from all Federal sources, not just PTFP - in a one-year period, you must have an audit performed in accordance with Federal guidelines as stated in OMB Circular A-133, dated June 30, 1997 (If you do not have a copy, you can get one by going to www.whitehouse.gov/omb and clicking on Circulars.)

These audits are performed in one of two ways. An *NTIA/PTFP-specific audit* may be performed if your organization receives Federal funds only from NTIA. If your organization receives funds from more than one Federal source during the year for which the audit is conducted, an *organization-wide audit* must be performed. (Note that CPB funding is not considered a Federal source.)

If an allowance for audit costs was included in your Grant Award, the audit report material must be submitted prior to the deadline for submitting the close-out documentation in order for the cost to be charged to the grant. If you are not going to include the audit within the Grant Award Period, you should seek an amendment to allow the audit funds to be used for the equipment purchased.

Questions about audits should be addressed to your Grants Specialist at NIST.

Review of Close-Out Documents

NTIA/PTFP reviews all close-out documents to be sure that the project was completed in accordance of the terms and conditions of the award. The program may request clarification or revision of material submitted in your package of close-out documents. Your prompt response will assist in the timely completion of the close-out process.

All grant recipients should be aware that failure to provide additional requested close-out information in a timely manner can result in

- * the establishment of an Account Receivable for all Federal funds paid to your organization and
- * the denial of future grants to your organization.

Final Report

If the final report (1) fails to address or meet any grant award objectives; (2) furnishes no evidence that the work contracted for was in fact performed; or, (3) clearly indicates that the written instructions and guidance provided by NTIA/PTFP, if any, were disregarded, NTIA may pursue remedial action, including, but not limited to, demand for submission, in whole or in part, of a fully satisfactory final report.

An unsatisfactory final report may result in the establishment of an Account Receivable by the Department of Commerce for the repayment of grant funds disbursed.

Post-Grant Requirements

Your responsibility to the Federal government through the Department of Commerce does not end when NIST informs you that your close-out has been completed. This section summarizes some of the requirements imposed on grantees in the years after a grant is closed out.

Retention of Records

Federal regulations require that your organization keep financial records, supporting documents, statistical records, and all other records pertaining to the grant project for three (3) years after your final financial status report has been

accepted. If any litigation, claim, or audit is started before the expiration of the three-year period, all records must be kept until all litigation, claims, or audit findings involving the records have been resolved. Grant recipients must keep the following records intact and accessible for inspection at any time:

- (1) Complete and current financial records that fully disclose the total amount of the project; the amount of the grant; and the amount, nature and sources of all non-Federal funds associated with the project; and
- (2) All records specified in Office of Management and Budget Circular A-110 (for educational institutions, hospitals, and non-profit organizations) and 15 CFR Part 24 (for state and local governments).

Inspections

Grantees must permit inspections at any time during normal business hours by NTIA and the Comptroller General of the United States, or their authorized representatives, of any books, documents, papers, and records relating to your planning grant.

NOTICE

We have estimated that each response to this collection of information will take on average 34 hours for planning grant recipients to prepare the certification of completion, final report, and list of project expenditures. Our estimates include the time to read the instructions, look through existing records, gather the required data, and complete and review the response. If you have any comments on this estimate or how we can improve the collection and reduce the burden it causes you, please write to the Office of Policy Coordination and Management, NTIA, Room 4892, Department of Commerce, Washington, DC 20230. Your comments will also be accepted via the Internet if you send them to. You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice.

OMB Approval No. 0660-0001.

Expires September 30, 2009

Revised 10/22/2007