

## Applicability

This document establishes the responsibility for the submission of required non-financial reports related to sponsored programs.

## Policy

Principal Investigators (PIs) and Co-Principal Investigators (Co-PIs) on sponsored programs are responsible for the management and conduct of sponsored activities. As part of that responsibility, PIs and Co-PIs are required to understand and comply with the technical reporting requirements associated with their awards.

Sponsors typically require submission of regular technical reports, which are generally required annually and at the completion of the project. Each sponsor will have different requirements and it is the PIs and Co-PIs responsibility to become familiar with those that govern their awards.

Sponsored Funds Administration (SFA) has the responsibility to insure and confirm all technical reports are submitted in a timely fashion. If technical reports cannot be submitted by the required due date, the PI should contact SFA prior to that due date with a written justification for the delay. SFA will then contact the sponsor with a request for a deadline of the due date. When a technical report is not submitted by the required due date and no extension has been sought, the following procedures will be followed to ensure compliance.

## ***Delinquent Reporting***

Delinquent reporting is a significant issue and can negatively impact payment on individual awards, future funding for the entire university, and can damage the PI's and university's reputation. In addition, audits encompass reporting compliance so federal penalties and other consequences due to non-compliance are real possibilities. In order to assure timeliness and full compliance with agency reporting requirements, the following procedure will be followed:

1. ***Initial Notification:*** PIs will be notified of reporting requirements upon establishment of a new sponsored award, and will be reminded via email when technical reports are due.
2. ***Delinquency Notification:*** If a report is not submitted within 30 days of the required due date, a second notice will be sent to the PI with a copy to the department chair or dean of non-departmentalized colleges/schools so they are aware of the non-compliance and can become actively involved in resolving the problem. If reports are not submitted within 90 days of the required due date, a third notice will be sent to the PI, Department Chair, and Dean. This notification will continue until the report is 120 days overdue or the report is submitted.
3. ***Notification of Potential Action:*** Once reports hit a delinquency of more than 120 days, the Associate Vice President for Research Administration and Research Foundation Operations Manager, will be alerted. In consultation with and support of the Vice President for Research, the following actions may be taken:
  - a. A hold will be placed on the establishment of all new awards for the PIs and Co-PIs;
  - b. A hold will be placed on the expenditure of all sponsored and infrastructure funds for the PIs and Co-PIs;

- c. Institutional approval will not be given for the submission of any new proposals to external sponsors.

All actions will be released immediately upon confirmation that the delinquent report has been submitted. This approach will allow SFA to ensure contractual obligations are met in a timely manner.

## **Financial Reporting**

The submission of all financial reports is the responsibility of SFA. Prior to completion of the final financial report, SFA will review the award activity to ensure all transactions have been processed and payments have been made. It is critical that PIs submit all requests for payments and reimbursements as soon as possible after the term date. Delinquency in submitting these requests could result in the disallowance of payment/reimbursement.

## **Invention Disclosure Report**

If your project resulted in an invention or innovation, you should contact the Office of Entrepreneurship and Innovation Partnerships (E&IP) to discuss next steps in protecting your intellectual property. SFA is responsible submitting invention reports to the sponsor, in coordination with E&IP.

## **Contact**

Any questions regarding this information should be directed to the Office of Sponsored Funds Administration at x7-6752.