

WORCESTER POLYTECHNIC INSTITUTE

Programmatic Reporting on Sponsored Programs Policy

I. PURPOSE

According to Uniform Guidance § 200.329, performance reports must be submitted “at the interval required by the Federal awarding agency or pass-through entity to best inform about improvements in program outcomes and productivity.”

Principal Investigators (PIs) on sponsored projects are responsible for the management and conduct of sponsored activities. As part of that responsibility, PIs are required to understand and comply with the technical reporting requirements associated with their awards. Upon expiration of the project, the PI is responsible for submitting the final technical report and/or other deliverables as specified to the sponsor within the timeframe specified in the sponsored agreement. Delinquency of reports and deliverables may cause an institution to suffer in its reputation with sponsors and often carry significant institutional sanctions. In some circumstances sponsors lose their ability to pay or do not honor the financial responsibility regarding their sponsorship of a project.

II. SCOPE

This policy is applicable to all schools, departments, units, and personnel of the University involved in administering sponsored awards.

III. POLICY

All programmatic reports, including final technical reports, are the responsibility of the Principal Investigator (PI). Reports that are late in submission could lead to a potential problem with future funding and should be avoided, whenever possible. All financial reports, including final financial closeout reports, are the responsibility of Sponsored Programs Accounting (SPA).

- a. **Progress/Technical Reports:** *A technical description of the project results and additional information as required by the sponsor. Additional information requested can include an abstract and a list of publications, patents, patent applications, and / or presentations at scientific meetings.*

PIs are responsible for the timely completion of all programmatic (technical, narrative, progress) reports required by the terms and conditions of sponsored program awards. It should be noted that many sponsors, especially Federal sponsors, will possibly take action, up to and including curtailment of future awards and withholding payment to the University, for noncompliance with the reporting requirements of awards.

- b. **Invention/Patent Reports:** *Document detailing all inventions or patents conceived or first reduced to practice during the course of the project under the award and the inventing party.*

As periodically required by the terms and conditions of awards, sponsors may require the submission of an Invention Report or a Patent Report (may also be referred to as a “Negative

Patent/Invention Report” if the sponsor requires confirmation that no inventions can be attached to the award). The PI is responsible for contacting their Post-Award contact to disclose any inventions or patents involved in the award, upon confirmation of the information by the Office of Technology Commercialization (OTC), Post-Award will submit the completed and signed report to the Sponsor or provide the signed report to the PI to submit.

c. Property Reports:

All property reports are to be completed by the Procurement office in accordance with the terms and conditions of individual awards. The PI is responsible for contacting Procurement Office to initiate the preparation of this report.

d. Other Reports:

Occasionally, additional reporting requirements will be included in sponsored program awards. In these instances, each situation will be handled on a case-by-case basis.

e. Financial Reports: *Final report or invoice reflecting a summary of all transactions on an award.*

Preparation of all financial reports, including final financial reports submitted at time of award closeout, are the responsibility of Sponsored Programs accounting (SPA). Amounts included in these reports are derived from the Workday financial system based upon incurred expenses.

IV. PROCEDURE

It is the PI’s responsibility to understand the terms and conditions of their award(s) to know which reports are required and how they are to be submitted. Except in the case that a report requires AOR (Authorized Organizational Representative) signature, the PI will complete and submit all programmatic reports per the requirements of their award.

In the event a report requires invention/patent or property information, the PI must contact their Post-Award contact no later than 15 days before the sponsor submission deadline to acquire this information from the correct office (Procurement or OTC) as detailed in the above responsibilities.

In the event that AOR signature is required, the PI will submit a completed and accurate report to their Post-Award contact no later than 15 days before the sponsor submission deadline. PIs may not act as AORs on programmatic reporting for sponsored programs.

If an award contains ambiguous terms and conditions for programmatic reporting, the following report submission deadlines from Uniform Guidance should apply.

Unless otherwise specified in the grant, annual project reports should be submitted electronically no later than 90 days prior to the end of the current budget period. The report is considered due during the 90-day period. The report becomes overdue the day after the 90-day period ends. It should be noted that the final annual report serves as the project’s final report and must be submitted in accordance with the schedule below.

Unless otherwise specified in the grant, the final project report should be submitted electronically no later than 120 days following the end date of the grant. The report is considered due during the 120-day period. The report becomes overdue the day after the 120-day period ends.

The grantee must submit final payment requests through Workday no later than 120 days after the end date of the grant.

V. ENFORCEMENT

Violations of this policy may result in appropriate disciplinary measures. Significantly overdue programmatic reports will result in notification of the Vice Provost of Research for review and enforcement actions.

VI. RESPONSIBLE OFFICE

Office of Sponsored Programs; Office of the Vice Provost for Research; resadm@wpi.edu

Policy Administrator: Office of Sponsored Programs

Effective Date: 10.26.23

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