Title: Technical Reporting on Sponsored Projects

Purpose

According to Uniform Guidance, 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.” This policy statement sets forth WPI’s position regarding the submission of sponsored project performance reports and outlines corrective actions imposed on researchers when this requirement is not met.

Directive

All programmatic reports, including final technical reports, are the responsibility of the Principal Investigator (PI).

- **Progress/Technical Reports:**
  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.

- **Invention/Patent Reports:**
  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. Post-Award will then contact the Office of Technology Commercialization (OTC) to confirm the information being provided is correct. Upon confirmation, Post-Award will submit the completed and signed report to the Sponsor.

- **Property Reports:**
  All property reports are to be completed by the Procurement office in accordance with the terms and conditions of individual awards.

- **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.

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 signature, the PI will complete and submit all programmatic reports per the requirements of their award.

In the event that Authorized Organizational Representative (AOR) signature is required, the PI will submit a completed and accurate report to their Post-Award contact no later than 10 days before the sponsor submission deadline. PI’s are not to act as AOR’s on programmatic reporting for sponsored programs unless specified as such in the terms and conditions of their award.
Submission Deadlines

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

**Annual project reports:** 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 paragraph ii below.

**Final project report:** 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.

Non-Compliance

Reports that are late in submission could lead to a potential problem with future funding and should be avoided, whenever possible. 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.

Prepared by: Office of Sponsored Programs (OSP)
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Created: February 18th, 2022