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Reporting Requirements for Sponsored Programs

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I. REASON FOR THIS POLICY

The federal and state governments and other sponsors require certain reports from contract and grant recipients during and after the period of a project in which funds have been used. The federal government established this requirement to comply with the Government Performance and Results Act of 1993, designed to reduce federal waste. State and private sponsors typically require reporting for similar reasons. Failure to comply with reporting requirements can jeopardize not only an individual project director's chances of future funding, but also the chances of other, unrelated faculty at USD. Federal awards are also governed by 2 CFR 215 ("Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-profit Organizations", OMB Circular A-110), so there are possible legal ramifications to failure to satisfy reporting requirements.

II. STATEMENT OF POLICY

Any University of South Dakota (USD) employee acting as director of a project (principal investigator, PI) receiving funding is responsible for complying with all the reporting requirements associated with that funding.

III. DEFINITIONS

INTERIM TECHNICAL REPORTS

Progress reports related to scientific, technical, or programmatic outcomes related to a project. They cover a defined period time that is shorter than the overall project timeframe. These can be required monthly, quarterly, annually, or at other intervals specified by the award documentation. Typically, interim reports include activities and progress to date, notification of and justification for deviations from the proposed schedule or scope of work, and discussion of work remaining. Failure to send interim reports by the required time can result in the delay of subsequent funding, premature termination of awards, or a full-scale audit.

FINAL TECHNICAL REPORT

Reports summarizing all work completed in the entire duration of the project. Since final reports are designed to summarize an entire project, interim reports are usually not sufficient to satisfy the final report requirement. Sometimes both an interim report for the final period as well as a final report for the entire project period is required. Neither report can substitute for the other. These dissertations and other publications are usually not sufficient to satisfy the final report requirement unless this is explicitly agreed upon in the award documents. Later or missing final reports can result in a sponsor refusing to accept future proposals from the PI or from other PIs at USD or return of awarded dollars.

INTELLECTUAL PROPERTY/PATENT REPORTS

Disclosures to a sponsor of new patentable ideas that have resulted from the activities performed under their funding, in whole or in part. Intellectual property is handled under a distinct set of rules. Not all sponsors require intellectual property disclosures, and some sponsors require explicit disclosure of a lack of intellectual property (“no intellectual property was created under this project”). Invention disclosures resulting from federal funding are mandated in P.L. 96-517, The Patent and Trademark Law Amendments Act, more commonly known as the Bayh-Dole Act. Reporting is accomplished by the Office of Research and Sponsored Programs (ORSP) through iEDISON.

PROPERTY AND EQUIPMENT INVENTORY REPORTS

A summary of equipment items that were purchased with funding from a sponsor or provided directly to the University by the sponsor. Equipment is defined as a tangible, nonexpendable item with an acquisition cost of \$5000 or greater. The award documents will specify whether equipment purchased with sponsor funds belongs to the University or to the sponsor at the end of the project. Award documents will also specify what reports, if any, are required concerning equipment.

FINANCIAL REPORTS

A detailed accounting of how funds were spent. Federal sponsors use a standard format for this report called the Federal Financial Report (FFR), Standard Form 425 (SF425). The frequency of financial reports will be specified in award documents. FFRs will be filed by Grants Accounting based on information in the University's accounting system; PIs are responsible for ensuring that charges to sponsor funds are entered into the accounting system in a timely fashion to ensure accurate reporting.

IV. PROCEDURES

- PI's receiving external funding shall review all award documents to determine what reports are required and the schedule of required reports. ORSP staff will assist in the interpretation of award documents as necessary.
- ORSP staff will, to the extent possible, remind PIs of upcoming report deadlines. Failure to send reminders does not excuse PI's from preparing reports in a timely fashion.
- PI's or ORSP will submit reports to sponsors, as required by award documents. A copy of all reports submitted by PI's will be provided to the ORSP.
- PI's will ensure that expenditures of sponsor funds are reported to the University accounting system in a timely fashion.
- Grants Accounting will prepare, and file financial reports based on information in the accounting system. Grants accounting will be responsible for filing financial reports according to the schedule established by award documents.

V. RELATED DOCUMENTS, FORMS AND TOOLS

While Federal sponsors are moving towards a more uniform set of reporting requirements, every award has specific reporting requirements. Please check with ORSP if you are unsure of the requirements for your specific award. Below are some typical requirements for various sponsors:

National Science Foundation

- Annual progress reports are due 90 days prior to the end of the current budget period, to be submitted through Fastlane.
- the final annual report often serves as the final project report.
- Project outcomes report for the public. Within 90 days of the end of the project a brief Project Outcomes Report must be submitted to Research.gov. This is intended for the broadest audience and is used to demonstrate the value of basic research.
- Additional reports will be specified in award documents.

National Institutes of Health

- Annual progress reports are required for all projects. Some progress reports are to be filed via SNAP, others are to be sent directly to the program officer; this varies by the award type (R01 vs. P20, for example).
- Annual progress reports are due within 90 days after the budget period.
- Final project reports are due within 90 days after the project period.

Department of Energy

- Progress reports are typically requested quarterly and are due within 30 days of the end of the reporting period.
- A final technical report is required; due 90 days after the end of the project.
- Copies of scientific publication or conference presentations may also be requested.
- Projects may be required to contribute ad-hoc reports upon request.

National Endowment for the Humanities

- multi-year projects may require annual progress reports.
- A final project report is due 90 days after the end of the project.
- the content of interim and final progress reports is spelled out in award documentation.
- National Endowment for the Arts
- One progress report is required when expenditure meets two-thirds of the total award amount.
- A final project report is due 90 days after the end of the project period.
- Copies of the final work product (book, musical recording, etc.) may be requested.

Small Business Administration

- Interim reports are required on a schedule based upon the length of time an organization has been receiving awards from DOC. This will vary from quarter to quarter. to semi-annually. Reports are due 30 or 90 days after the end of the reporting period.
- Annual reports are required for all projects. Reports are due 90 days after the end of the project year.

NASA

- Interim reports are due for every project year except the final year of a project. Reports are due 60 days before the end of the reporting period.
- A final project summary report is due 90 days after the end of the project.
- Published materials stemming from a project must acknowledge NASA as the source of funding for the project.

EPA

- Annual interim reports are due 90 days after the end of each reporting period.
- Publications stemming from EPA-funded projects should have a reprint sent to the EPA, either at the time of publication or included as part of interim reports. Publications should contain acknowledgement of EPA funding.
- Annual reports should also include a summary suitable for posting to the public web.
- A final report is due 90 days after the end of the project. A web-suitable executive summary should be included in the final report.