

PROCEDURAL STATEMENT

Procedural Statement Title: Sponsored Projects Progress and/or Technical Reports

Functional Area: Research Administration

Related Policy: U.S. Office of Management and Budget's Uniform Guidance, 2 CFR 200.329(c)(1)

Effective Date: February 1, 2019

Approved by: Massimo Ruzzene, Vice Chancellor for Research & Innovation and Dean of the Institutes

Responsible Office: Office of Contracts and Grants (OCG)

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Last Reviewed/Updated: May 28, 2025, March 1, 2023, January 11, 2021

I. PURPOSE

According to U.S. Office of Management and Budget's Uniform Guidance, [2 CFR 200.329\(c\)\(1\)](#), 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 procedural statement sets forth CU Boulder's position regarding the submission of sponsored project performance reports and outlines corrective actions imposed on researchers when this requirement is not met.

II. CU BOULDER REQUIREMENTS

[Regent Policy 8.A: Principles of Ethical Behavior](#) states that "Members of the university community are expected to conduct themselves ethically, and in compliance with all applicable laws, regulations, and university policies." Per Federal regulations and Regent Policy, CU Boulder requires that performance reports are submitted in a timely manner and according to award specifications to ensure campus research obligations to the sponsor are fulfilled. The lead Principal Investigator (PI) is responsible for preparing and submitting these reports to the sponsor within the required timeframe. Additionally, the PI must ensure that all senior project personnel submit their respective reports promptly. Past due reports place the University's future funding at risk and create a critical non-compliance issue that could potentially lead to blocked or delayed awards.

Departing or retiring PIs must complete all reports before leaving CU Boulder. Those with courtesy appointments must fulfill reporting obligations for ongoing awards, including final reports.

III. DEFINITIONS

Progress or technical reports inform sponsors about research results, significant changes, personnel, travel, and future plans for the subsequent budget period or year. The content and timeline requirements follow sponsor and/or award terms and conditions.

IV. POLICIES, PROCEDURES, AND COMPLIANCE

OCG sends up to three overdue notices to the Department Chair or Institute Director, copying the PI. Notices set a deadline before corrective action is taken by OCG.

A. Guidelines for Federal Awards

CU Boulder must submit interim performance and final technical reports per [2 CFR 200.329\(c\)\(1\)](#), to comply with award terms. Each federal agency defines its own reporting requirements and deadlines. Individual federal contracts can also have their own requirements tailored to the contract's Scope of Work.

B. Guidelines for Non-Federal Awards

The criteria for submission of performance/technical reports for non-Federal projects are defined by the sponsors and/or the specific award terms and conditions.

C. Submission Procedures

It is the PI's responsibility to follow the terms and conditions of their award. OCG uses InfoEd to track award requirements and relies on information from the PI to confirm their compliance with these reports.

PIs are responsible for submitting their reports to the sponsor; however, in some cases federal sponsors require an OCG signing official to complete the process. Review OCG's [Guide to Sponsor Reporting Requirements](#) for sponsor specific processes.

D. Record Retention

InfoEd is the official repository for documents that substantiate the sponsor's authorization of the award and award actions. These documents must be saved following the University's [Record Retention Policy](#) to confirm that CU Boulder has met its award obligations. **Sending the reports to OCG releases the PI from the**

responsibility of retaining these documents for the period specified by the retention schedule. Therefore:

- Upon submission, the PI should send a copy of the report to ocgreports@colorado.edu, or
- If the report is only available in a web format notify ocgreports@colorado.edu that it was submitted and when.

E. Internal Tracking and Email Notifications

OCG reviews each award document and associated modifications and lists the progress/technical reporting requirement in the Deliverables screen in the InfoEd system. If a report is more than **30 days** late based on InfoEd records, and hasn't been submitted as required by the sponsor, OCG begins the steps outlined below. Each notice sent to the PI allows **ten (10) days** to submit the report.

1. OCG sends the first email notification to the PI's Chair or Director and copies the PI, the project's Fiscal Manager and ocgreports@colorado.edu.
2. If the required report is not completed within ten days, a second notice is the PI's Chair or Director and copies the PI, the project's Fiscal Manager and ocgreports@colorado.edu.
3. If the report is not submitted by the second deadline, OCG sends a final notice to the PI's Chair or Director, with a copies to the PI, the project's Fiscal Manager, the Director of OCG, and either the Research and Innovation Office (RIO) or the Associate Dean of the PI's College or School. ***This notice makes clear it is the final warning and states that OCG will withhold all award actions for the PI's active projects until the overdue report(s) is submitted.***
4. If the PI has repeated non-compliance with reporting deadlines, additional corrective action will be included in the final notice. In these cases, OCG will not submit new proposals for the PI until the overdue report(s) is submitted.
5. At this stage, the College, School, or RIO may take additional corrective actions, which could include withholding merit increases during the next merit cycle.

F. Sponsor Delinquency Notices

OCG is often copied on email notifications sent to PIs about overdue reports. In some cases, the sponsor may also contact OCG's Director to request immediate action.

- If OCG or OCG's Director receives notice from a sponsor that a report is more than 30 days overdue, OCG may either:
 - Give the PI a 10-day deadline to submit the report, **or**
 - Notify the PI's Chair or Director that OCG will immediately withhold any award action until the report(s) is submitted. This notice will also copy the PI, RIO, and the Associate Dean of the PI's College or School.
- If the sponsor directly requests immediate action, the PI could also be subject to additional corrective action by their College, School, or RIO.

G. Corrective Action

Part IV, Section D.1. in the [Professional Rights & Duties of Faculty Members Policy](#) states that sanctions for unprofessional conduct should be appropriate to address and correct the issue. The corrective actions outlined in this Procedural Statement are designed with the same intent. Overdue technical and/or progress reports, as identified by the sponsor, require prompt attention to avoid sponsor-imposed penalties.

Escalating Corrective Action Steps:

1. **First Corrective Step:** OCG will place a hold on the PI's active awards. OCG will not process any incoming requests (e.g., no cost extension) or sponsor actions (e.g., additional funding, period of performance extensions, new awards) until the overdue report(s) is submitted.
2. **Second Corrective Step:** If the PI has a history of repeated non-compliance with reporting, OCG will also stop submitting new proposals for that PI until all overdue reports are submitted.
 - a. In alignment with National Science Foundation policy, this restriction includes any proposal where the individual is listed as PI or co-PI.
 - b. A faculty member will no longer be considered as having repeated non-compliance once:
 - i. All overdue reports have been accepted by the sponsor, **and**
 - ii. No additional reports result in corrective action within the following 12 months.
 - c. If another report becomes overdue within the 12-month period and leads to a First Corrective Step, the faculty member will again be considered non-compliant with reporting requirements. At that point, the proposal submission restriction may be re-applied. This action may also be initiated at the discretion of the PI's College, School, or RIO.

QUICK REFERENCE: CORRECTIVE ACTION STEPS FOR LATE PERFORMANCE REPORTS

Step	Trigger	OCG Action	Additional Notes
Step 1: Initial Hold on Award Actions	Report is more than 30 days overdue and prior notices have been sent	OCG places a hold on the PI's active awards (e.g., no-cost extensions, new awards, additional funding) until the overdue report is submitted	This hold remains until the sponsor confirms receipt of the report
Step 2: Proposal Submission Restriction	PI has a history of repeated non-compliance	In addition to holding award actions, OCG will stop submitting new proposals for the PI (including those as co-PI) until the overdue report(s) is submitted	This restriction follows NSF precedent and applies across all proposals
Ending the Restriction	All overdue reports are submitted and accepted by the sponsor No new overdue reports result in action for the next 12 months	Proposal restriction is lifted automatically	
Reapplying Restrictions	A new report becomes overdue within 12 months of prior action	Step 1 and/or Step 2 actions may be re-imposed	

V. FREQUENTLY ASKED QUESTIONS

Q: If I need to send a copy of my performance reports to OCG, why doesn't OCG just submit them? Why is it my responsibility?

A: Submitting performance reports on time is the lead Principal Investigator's responsibility. These reports reflect the progress and accomplishments of the research and must align with the project's scope of work. While OCG helps track reporting compliance, we generally do not submit reports on behalf of the PI. Most sponsors require the PI to complete and submit the report directly, and their systems are designed with that in mind.

In some cases, OCG may assist with submission (see the [Guide to Sponsor Reporting Requirements](#) for details).

Q: What if I need help understanding the reporting requirements or using a sponsor's reporting system?

A: Please email ocgreports@colorado.edu, or find your department contact in the [OCG Directory](#).

Q: I've had awards for more than 10 years, and the sponsors never seemed strict about reports. Why have they changed?

A: Federal agencies are now required by Congress and the Office of Management and Budget to close awards in a timely manner. Since 2013, agencies like NIH and NSF have been audited and directed to improve compliance with reporting deadlines. As a result, many sponsors have strengthened their tracking systems and are now taking steps – or issuing warnings – against individual PIs and institutions for late reports. What used to be rare is now standard practice.

VI. RESOURCES

OCG's [Guide to Sponsor Reporting Requirements](#)

[Professional Rights & Duties of Faculty Members Policy](#)

[Regent Policy 8.A: Principles of Ethical Behavior](#)

U.S. Office of Management and Budget's Uniform Guidance, [2 CFR 200.329\(c\)\(1\)](#)

VII. HISTORY

Changes	Date	Approved By
Adopted	02/11/2019	Terri Fiez
Revised with updated 2 CFR 200 references, removal of step to call PIs to verify email, renumbering of sections, addition of Resources	01/11/21	Denitta Ward
Minor typos corrected, changed to Massimo Ruzzene for approval	03/01/23	Massimo Ruzzene
Edited for clarity and updated with current procedures	05/28/2025	Alexa Van Dalsem