I. PURPOSE

This document 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. PROCEDURAL STATEMENT

CU Boulder requires that performance reports are submitted timely and according to award specifications to ensure campus research obligations to the sponsor are fulfilled. It is the responsibility of the project’s lead Principal Investigator (PI) to complete and submit these reports to the applicable sponsor within the timeframe stipulated by that sponsor and to ensure all other senior personnel on the project also submit their reports on time. Past due reports place the University’s future funding at risk and create a critical compliance issue. The Office of Contracts and Grants (OCG) has received notices from Federal sponsors saying they have blocked particular awards and have also delayed processing certain requests because of non-compliance.

PIs with delinquent reports shall receive a maximum of three delinquency notices from OCG for any specific overdue report. These notices copy the Department Chair or Institute Director and stipulate a specific timeframe within which the reports must be submitted before corrective action will be taken by OCG and/or the PI’s respective College or School.

PIs who are leaving the University or are retiring must complete all outstanding report obligations before physically leaving CU Boulder or before their retirement date. Exiting PIs with courtesy appointments are expected to meet reporting obligations for ongoing awards throughout their lifecycle, including all final reports.

III. DEFINITIONS

Progress or technical reports provide performance information to Federal and non-Federal sponsors regarding the research results associated with financial assistance or contractual agreements awarded to CU by describing scientific progress, identifying significant changes, reporting on personnel and any travel activity, and describing plans for the subsequent budget period or year. The content and timeline requirements for these reports are dictated by specific sponsor and/or award terms and conditions.

IV. RELATED POLICIES, PROCEDURES, AND GUIDELINES

A. Guidelines for Federal Awards

Under the guidelines imposed by 2 CFR 200.328(b)(1), known as the Uniform Guidance, CU Boulder is required to submit annual or other interim performance reports and final technical reports to document accomplishments and be compliant with the award terms. Each federal agency defines its own specific
guidelines outlining which reports are required and when they need to be submitted. Individual federal contracts can also have their own unique requirements tailored to the contract’s Scope of Work.

B. Guidelines for Non-Federal Awards

The basic criteria for submission of annual or other interim performance reports and final technical reports for non-Federal sponsored projects are defined by those sponsors and/or the specific award. Therefore, it is important to review the terms and conditions for each non-federal award as they can be unique and may differ considerably from other sponsors.

C. Submission Procedures

It is the PI’s responsibility to understand the terms and conditions of her/his/their award to know which reports are required and how they are to be submitted. InfoEd provides OCG the capability to track each award’s requirements so it is important the database accurately reflects the fulfillment of these obligations. InfoEd is also the official repository for documents that substantiate the sponsor’s authorization of the award and award actions, and fulfillment of CU Boulder’s obligations for that award. These award documents must be retained according to the University’s Record Retention Policy, specifically with the Boulder campus schedule. Sending the technical and progress 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.

Submitting Reports

PIs are responsible for submitting their technical and/or progress reports to the sponsor. However, federal sponsors sometimes require a signing official to submit which means someone in OCG needs to complete the process. If there are ever questions regarding the reporting process for a specific award, OCG can provide assistance to PIs with issues encountered during submission and CU Boulder’s “How to” Guide for Reporting Requirements tool located on the OCG website provides a matrix summarizing key parameters about sponsors’ report submission processes.

D. Internal Tracking and Email Notifications

With the implementation of InfoEd in July 2015, OCG reviews each award document and associated modifications and lists each progress/technical reporting requirement in the Deliverables screen in the InfoEd system. These data can then be tracked and reviewed to ensure timely completion and compliance with sponsor requirements. When reports are not submitted according to sponsor requirements and become delinquent for more than a month according to information in InfoEd, OCG initiates the process outlined below. Each notice sent to the PI provides a window of three (3) business days in which the report needs to be submitted.

1. OCG sends the first email notification to the PI and the PI’s Chair or Director and copies the project Fiscal Manager and ocgreports@colorado.edu.
2. If the required report is not completed within three business days, OCG phones the PI and/or the project Fiscal Manager to confirm the emails are being sent to the correct address and to emphasize the need to submit the report within three business days. A second email is sent once the email address is confirmed and a voice message has been left for the PI.
3. If not completed by the second deadline, OCG sends its final email to the PI with a copy to the project Fiscal Manager, the PI’s Chair or Director, to OCG’s Director, and to the Research and Innovation Office (RIO) or the Associate Dean of her/his/their College or School. This email clearly states it is OCG’s final notice and advises the PI that until the outstanding report(s) is submitted, OCG will withhold any award action for her/his/their active awards.
4. At this point, additional corrective action may be enacted at the discretion of the College, School, or RIO that could involve one or both of the following:
   a. No proposals will be submitted for that PI
   b. Deny any merit increases in the next merit cycle

Sponsor Delinquency Notices
OCG is also copied on email notifications that sponsors send to PIs about overdue reports and sometimes the sponsor contacts OCG’s Director about late reports for which they are requesting immediate action.
   • If OCG receives a late notice from the sponsor about a report that is delinquent for more than a month, OCG can either give the PI a 3-business day deadline or notify the PI that OCG will immediately withhold any award action until the report(s) is submitted plus copy the PI’s Chair or Director, RIO, and the Associate Dean of the College or School.
   • If OCG receives a direct request from the sponsor for immediate action, the PI may also be subject to additional corrective action by her/his/their College, School, or RIO.

V. FREQUENTLY ASKED QUESTIONS (FAQs)

Q: If I need to send a copy of my performance reports to OCG, why doesn’t OCG just submit the reports by the required deadline? Why do I have to do them?
A: Completion and submission of performance reports within the sponsor deadlines are the primary responsibility of the lead Principal Investigator because these reports capture the achievements of the research and its progress according to the scope of work. OCG helps ensure compliance with the reporting requirements by tracking the submissions of the reports, not by submitting the reports on behalf of the PI. In some cases, OCG does assist with the report submission (see the “How to” Guide for Grant Reporting Requirements tool), however, it is understood by most sponsors that the PI will complete and submit the required performance reports themselves and the sponsors have designed their submission systems with that understanding.

Q: What if I need assistance with the requested reporting requirements or reporting systems?
A: You can send an email to ocgreports@colorado.edu or find the contact for your department in the OCG Directory.

Q: I’ve had sponsored awards for more than 10 years but the sponsors have always been pretty relaxed about reports I needed to complete. Why have they changed?
A: Federal agencies have been given the mandate by Congress and the Office of Management and Budget to close awards per Federal requirements. In addition, both NIH and NSF have been audited since 2013 with recommendations to take appropriate actions to ensure performance reports are submitted on time. Consequently, many agencies are continually improving their capability to track outstanding obligations and are taking steps for or warning of disciplinary action against individual PIs and the University because of unfulfilled obligations. Prior to 2014, OCG had seen this type of sponsor response only in rare and extreme situations. It is now becoming common practice.

VI. HISTORY

N/A