Policy #: Total Pages: 2 Created: 2/25/2021 Revision Date:

SPONSORED PROJECT PROGRESS REPORTING PROCEDURES

PURPOSE:

The purpose of these procedures is to establish roles and responsibilities to ensure the timely submission of all sponsored project required deliverables in accordance with the requirements of each sponsoring agency and the Office of Management and Budget (OMB) Uniform Guidance 2 CFR 200 Performance and Financial Monitoring and Reporting.

Most sponsored projects require some type of progress (technical) reporting for which the Principal Investigator/Project Director (PI/PD) is responsible for preparing and submitting in a timely manner. Requirements for progress reports vary amongst the sponsored agencies. Timely submission of these reports is an important responsibility of the PI/PD. Failure to do so could result in the agency withholding new funding for CSUSM and CSUSM Corp and could jeopardize the institution's ability to obtain future awards from sponsors as generally agencies will not make a new award unless all previous awards are in compliance. It is important to review the terms and conditions of the award notice to understand reporting requirements.

SCOPE:

These procedures are applicable to all CSUSM University faculty/staff with an externally funded sponsored project with technical reporting requirements.

PROCEDURE:

The submission of interim progress and final progress reports are often a requirement imposed by federal and non-federal sponsors. To determine what a sponsor requires, review the award's terms and conditions. In order to satisfy the terms and conditions required by most awards, the PI/PD must furnish the sponsor with interim and/or final progress reports. Funding agencies consider the progress report to be a useful tool in monitoring and evaluation of the sponsored project.

Some agencies require the use of an online portal or a specific template while some require an authorized signature or submission by an authorized official. Depending on the agency and requirements, OSP may or may not be involved in submitting progress reports. OMB has mandated that federal agencies (NIH, NSF, DoD, etc.) implement a federal-wide research performance report (RPPR) for submission of required annual or other interim performance reporting on research grant and cooperative agreement awards to standardize recipient reporting on federally funded research projects. Each federal agency has a different implementation timeline. Refer to the specific terms and conditions of the award.

For additional information regarding NIH RPPR format, visit the NIH grants and funding website.

ROLES AND RESPONSIBILITIES:

Principal Investigator/Project Director

- 1. Write scientific and budget/financial justification/explanation portions of the progress report.
- 2. Report reference publications, if required by sponsor.
- 3. Notify OSP if prior approval is required (e.g. due to change in effort or addition of an international subcontractor).
- 4. Provide OSP with a copy of submitted progress report or notification of submission to sponsor.

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Office of Sponsored Projects

- 1. For NIH continuations (RPPR), OSP is responsible for updating institution information, creating NIH Commons profiles, confirming whether the unobligated balance comprises 25% or more of the total direct costs, and personnel that worked on the project.
- 2. For non-NIH awards, review the award terms and provide PI/PD with a timeline and list of responsibilities to complete the progress report.
- 3. Confirm whether prior approvals are needed (e.g. due to change in effort or addition of an international subcontractor).
- 4. Work with PI/PD to develop budget, as required.
- 5. If necessary, format information into sponsor-specific forms/reports, conveying any specific level of detail required.
- 6. When an agency requires the financial information be included with progress report, OSP will prepare the financial portion and work with the PI/PD to determine the appropriate steps for submitting the report. A PI/PD's assigned Sponsored Projects Analyst in OSP can provide guidance and help answer questions regarding the submission of progress reports.

When an authorized institutional signature or confirmation is required, the assigned Sponsored Projects Analyst will be responsible to route for appropriate internal signatures. Additionally, when there is a requirement for reporting final inventions, the OSP will work with the Office of Graduate Studies and Research (OGSR) to confirm any inventions.

| Agency | Submission Website | Reporting Frequency | Responsible for Submission |
|--|---|---------------------|---|
| Department of Education | See Notice of Award for Contacts or instructions from Program Officer | Annual and Final | Principal Investigator must prepare and submit, OSP signs face page |
| National Science Foundation | https://research.gov | Annual and Final | Principal Investigator/Project Director |
| National Institutes of Health | https://commons.era.nih.gov/ | Annual and Final | Principal Investigator must prepare, OSP submits |
| National Aeronautics and Space Administration | Emailed – See Notice of Award for Contacts | Annual and Final | Principal Investigator/Project Director |
| State of California | Emailed – See Notice of Award for Contacts | Annual and Final | Principal Investigator/Project Director |

RECORD RETENTION:

The record retention period for all sponsored project records shall be either three (3) years after the final financial report and/or invoice date or per the sponsor's guideline requirement; whichever period is longer.

DEFINITIONS:

Progress reports are required annual submissions that document grantee accomplishments and compliance with the terms of the award. They describe scientific progress, identify significant changes, report on personnel, and describe plans for the subsequent budget period or year.

REFERENCES:

CSUSM Corporation Policies and Procedures

CSUSM Corporation Sponsored Projects Closeout Procedures (in progress)

Office of Management and Budget (OMB) Uniform Guidance 2 CFR 200