

Office Research Services

Policy 13.003

Area: Delinquent Technical Reports and Other Deliverables

Authority: Associate Provost for Research and Dean of the Graduate School

History: Placed into effect July 2014

Responsible Office: Office of Research Services

Reason for Policy

Principal Investigators (PI's) on sponsored projects are responsible for the management and conduct of sponsored activities. As part of that responsibility, PI's are required to understand and comply with the technical reporting requirements associated with their awards. Upon expiration of the project, the PI is responsible for submitting the final technical report and/or other deliverables as specified to the sponsor within the timeframe specified in the sponsored agreement.

This policy establishes guidelines to assist with the timely, submission of quality technical reporting and other deliverables as required by individual sponsored agreements. Delinquency of reports and deliverables may cause an institution to suffer in its reputation with sponsors and often carry significant institutional sanctions. In some circumstances sponsors lose their ability to pay or do not honor the financial responsibility regarding their sponsorship of a project.

To facilitate compliance with technical reporting and other deliverable requirements, and remedy delinquent submissions, Sponsored Programs subscribes to the following guidance associated with securing timely and satisfactory results:

Background

From time to time the institutions receive notification from external sponsors advising that technical reports and/or deliverables are overdue. When such notifications are received, this is the standard procedure for Sponsored Programs to follow to ensure a satisfactory response and resolution.

Purpose and Applicability:

This policy establishes the management of technical reports and/or other deliverables required under a sponsored award agreement.

Technical reporting and/or other deliverables are the responsibility of the PI and must be completed to meet sponsor's requirements. Sponsored Programs will provide a reporting and/or deliverable schedule at the beginning of the award and will assist faculty and departmental staff

with the completion of technical reports and/or deliverables to ensure compliance with the terms and conditions of the award as needed.

Late submission of technical data and/or deliverables may affect the reimbursement of expenditures by the sponsor. The Non-Student Billing Department will submit periodic and final billing or financial reports on the assumption that required technical reports and/or deliverables have been submitted by the PI.

Periodically, Sponsored Programs personnel will inventory available on-line sponsor resources, to ascertain whether overdue technical reports exist as well as receive notification from the Non-Student Billing Department. If, in so doing, Sponsored Programs identifies overdue technical reports and/or deliverables, Sponsored Programs will take the following pro-active steps to resolve the delinquency before the sponsor is forced to take significant steps to resolve the matter:

- If an invoice has been submitted and not paid because of a delinquent technical report and/or deliverable, the PI will be notified by email that the technical report and/or deliverable must be submitted and due date of submission. The PI will also be notified that a copy of the technical report, transmittal letter, and/or cover page should be forwarded to the Office of Sponsored Programs for file documentation. All actions will be documented in the project file.
- If the request is made by phone, individual receiving phone call will reduce the request to writing, by e-mail, to the PI requesting that he or she submit the technical report and/or deliverable to the sponsor.
- When appropriate, but not necessarily always, Sponsored Programs requests that upon securing the technical report and/or deliverable report the PI ensure that the technical report is submitted and forward a copy of transmittal confirmation to Sponsored Programs.
- Notify the sponsor and Non-Student Billing, when appropriate, of the resolution to the technical reporting and/or deliverable delinquency.

Exclusions/Exceptions

The University is required to submit technical reports as well as other agreed upon deliverables required under the terms and conditions set forth in all sponsored awards.

If a PI cannot submit a technical report by a required due date, s/he should contact Sponsored Programs prior to the due date with a written justification for the delay. In some cases, Sponsored Programs can contact the sponsor to request an extension for the report if a sufficient justification exists. When a PI has not prepared a technical report by the required due date and has not sought an extension or provided sufficient information to justify a delay, the following delinquent reporting procedures may be enforced to assure compliance.

Failure to Comply

Delinquent reporting is a significant issue and can negatively impact payment on individual awards, future funding for the entire university, and can damage a universities reputation. Furthermore, audits, including our annual A-133 audit, encompass reporting compliance so federal penalties and other consequences due to non-compliance are real possibilities.

Consequently, the following procedures are designed to assure timeliness and full compliance with agency reporting requirements.

Non- or unsatisfactory response by the PI (defined as not responding or responding in a manner that does not resolve the matter to the satisfaction of the sponsor) may result in pressure applied beyond that inherent in failing to comply with the expectations of the institution's sponsors.

- If the report and/or deliverable is not submitted by the due date and the PI has been nonresponsive for 1 month, the Department Chair/School Director and Director of Sponsored Programs will be copied on correspondence so that the department is aware of reporting and deliverable noncompliance and can become actively involved in resolving the problem.

This procedure will continue until the report(s) and/or deliverable(s) become seriously delinquent (greater than 3 months overdue) or the reports are submitted. These pressures may be in the form of the following sanctions imposed on a case-by-case basis upon review by the Associate Provost for Research and Dean of the Graduate School:

- Suspension of the right to submit proposals for new, renewal, supplemental or continuation funding by the PI or co-Investigators on the delinquent project until satisfactory resolution of the delinquency.
- Suspension of current sponsored projects to further expenditure pending satisfactory resolution of the delinquency.
- Termination of existing sponsored projects and termed suspension from submitting proposals or managing awards as a PI, but not as a co-Investigator under the explicit direction of a non-suspended PI.
- Recovery of the costs associated with agreement default (non-payment) through assessment of the college or unilateral reduction in earned overhead receipts returned to the college.

Related Information:

All technical reports must be maintained in accordance with the University of North Carolina Wilmington and University of North Carolina General Records Retention and Disposition Schedules.

Contact: Director of Sponsored Programs, 910.962.3810, www.uncw.edu/ors/policies