



**The Research
Foundation for**

The State University of New York
University at Buffalo

Technical Report Requirements and Compliance on Sponsored Awards

Purpose

This document outlines the responsibility for and compliance oversight of the submission of required technical reports related to sponsored awards.

Principal Investigators (PIs) and Co-Principal Investigators (Co-PIs) on sponsored awards are responsible for the management and conduct of sponsored activities. As part of that responsibility, PIs and Co-PIs are required to understand and comply with technical reporting requirements associated with their awards.

Technical Reports

Background

Sponsors typically require submission of regular technical reports, which are generally required annually, and at the completion of the project. Each sponsor has different requirements and it is the PI's and Co-PI's responsibility to become familiar with those requirements that govern their awards. In most cases, it is the PI's responsibility to complete and submit technical reports directly to sponsors. In some cases, for example NIH RPPRs, the PI and Sponsored Projects Services (SPS) work together to complete and submit the report. Regardless of the specifics of the submission, since technical reports deal with the progress of the awarded project, it is the PI's responsibility to ensure it is completed and submitted to the sponsor per the award guidelines.

SPS, on behalf of the Research Foundation for SUNY and the University at Buffalo, has the responsibility to ensure and confirm all technical reports are submitted in a timely fashion. The PI should notify SPS immediately upon submission of a technical report. If technical reports cannot be submitted by the required due date, the PI should contact SPS prior to the due date with a written justification for the delay. SPS will then contact the sponsor with a request for a deadline extension. When a technical report is not submitted by the required due date and no extension has been sought, the below procedures will be followed to ensure compliance.

Delinquent Reporting and RF Monitoring

Delinquent reporting is a significant issue that can negatively impact payment on individual awards, future funding for the entire university, and the PI's and university's reputation. In addition, university and project specific audits encompass reporting compliance, so federal penalties and other consequences due to non-compliance are real possibilities.

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In order to ensure timeliness and full compliance with agency reporting requirements, the following procedure for technical report submission compliance will be implemented:

1. **Initial Notification** – PIs will be notified of reporting requirements upon the establishment of a new sponsored award.
2. **Automated Notification for Upcoming Reports:** The PI will receive automated emails from the RF Report Center 90 days before, 60 days before, and 30 days before a report's scheduled due date.
3. **Delinquency Notification:** PIs will receive two separate notifications regarding delinquent reports:
 - a. Monthly automated RF Report Center emails listing any past due reports.
 - b. SPS direct emails:
 - i. If a required report is not submitted within 30 days of the required due date, SPS will send a direct email notice to the PI informing them of the delinquent report.
 - ii. If a report is not submitted within 60 days of the required due date, SPS will send a second email notice to the PI, Department Chair, and Dean. This notification will come from the SPS Assistant Director of Operations, pointing out the PI's responsibility for timely reporting under the [Financial Responsibility for Sponsored Projects policy](#) and warning that at the 90 day overdue mark, SPS will freeze the PI's active accounts.
4. **Notification of Action:** Once a report is delinquent by 90 days, the SPS Assistant Director of Operations will notify via email the PI, Department Chair, Dean, and the Associate Vice President for Sponsored Programs that the following actions will be taken immediately:
 - a. A hold will be placed on the establishment of all new awards for the PIs;
 - b. A hold will be placed on the charging of all sponsored funds for all active accounts in which the PI is listed as the Award PI

All hold actions will be released immediately upon confirmation that the delinquent report has been submitted. This approach will allow SPS to ensure contractual obligations are met in a timely manner.

Non-Technical Reports

Financial Reports

The submission of all financial reports is the responsibility of SPS. Prior to completion of the final financial report, SPS will review the award activity to ensure all transactions have been processed and payments have been made. It is critical that PIs submit all requests for payments and reimbursements as they are incurred and as soon as possible after the term date. Delinquency in submitting these requests could result in the disallowance of payment/reimbursement.

Invention Disclosure Reports

If your project resulted in an invention or innovation, you should contact the Technology Transfer Office (TTO) to discuss next steps in protecting your intellectual property. SPS is responsible for submitting invention reports to the sponsor in coordination with TTO.

Other Reports

Some sponsors may request additional annual or closeout reports, such as Property, Release of Claims, or Assignment of Refund reports. These types of reports are typically the responsibility of SPS, but may require input from the PI to complete.

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