

SOP#	OSRA0005
Effective Date:	02/01/2024
SOP Owner:	OSRA

Submitting a Progress Report for OSRA Review Standard Operating Procedure

1. Purpose

The majority of grant making sponsors require routine progress and performance reports as a condition of receiving a grant award. These reports are often referred to as non-competitive since they do not undergo full sponsor review for funding consideration. Instead, progress reports are a condition of continued funding. Unlike a full grant application, they detail project accomplishments and activity for the reporting period.

Progress report requirements, including content, submission method and deadline frequency, can vary from sponsor to sponsor. Principal Investigators (PIs) and their Departmental Staff are responsible for thoroughly reviewing all award notices for full progress report requirements and details. PIs, or their Departmental Staff on their behalf, must submit all progress report documents that require signature and/or submission by an authorized official to the Office of Sponsored Research Administration (OSRA) for full review and approval. OSRA is responsible for ensuring progress reports meet all requirements listed in award notices and are in compliance with WCM policies prior to submission.

2. Scope

This standard operating procedure (SOP) should be used by Academic Departments and OSRA when preparing and submitting a progress report for an award sponsor. It outlines the responsibilities of PIs and their Departmental Staff when submitting documents to OSRA for internal review.

While progress reporting requirements can vary depending on sponsor and grant type, this document standardizes the process by which all progress reports that require signature and/or submission by an authorized official, be prepared and submitted to OSRA.

3. Prerequisites

PI must have an active award containing progress and performance reporting requirements.

4. Definitions

OSRA – Office of Sponsored Research Administration

AOR - Authorized Organization Representative

eRA Commons – Department of Health and Human Services (including NIH) web based grants management system

RPPR – Research Performance Progress Report, required format for NIH progress reports

Prime Site – Institution submitting grant application directly to Sponsor, when WCMC is a consortium site documents approved by OSRA are submitted to a prime site for inclusion in their proposal. If successful, this relationship becomes an incoming subaward.

Consortium Site – Entities listed on WCMC grant applications when WCMC serves as the Prime Site. If successful, this relationship becomes an outgoing subaward.

WRG PT – Weill Research Gateway sponsored programs tracking record.



SOP#	OSRA0005
Effective Date:	02/01/2024
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5. Policy

Upon receipt of a Notice of Award, the PI, Department, and OSRA must review the terms and conditions to determine progress report requirements and due dates. If WCM is not prime, the PI, Department, and OSRA must review the executed incoming subaward agreement between the Prime Site and WCM to determine reporting requirements. PI and Department must track due dates to ensure required documentation is submitted in accordance with sponsor, departmental, and OSRA deadlines. For NIH awards, OSRA will provide progress report reminder notifications 60 days in advance of the due date.

PI and DA will prepare the progress report documents, following all sponsoring agency and departmental policies and deadlines. PI and department administrator must carefully review and ensure compliance with sponsor progress report guidelines.

NIH RPPRs and all other progress reports that require institutional sign-off, must be submitted to OSRA within 7 business days of the deadline. OSRA Specialists will do their best to prioritize review of reports routed after the internal deadline, however that will depend upon volume.

NIH RPPRs must be reviewed and approved by the OSRA prior to submission to NIH. Submission of the RPPR will only occur after OSRA review is concluded and all applicable revisions are addressed. Progress reports will be **overdue until properly reviewed and submitted**. Requests for submission without OSRA review will not be accommodated and cursory reviews do not apply to NIH RPPRs.

Failure to comply with this process may result in progress report submission to NIH after the deadline date. Failure to submit complete and accurate progress and financial reports to NIH may affect future funding to WCM and may result in a delay of continued support.

5.1 Roles and Responsibilities

PI/Department - holds the **primary responsibility** for reviewing award notices for progress report requirements and tracking the applicable deadlines. They are also responsible for collecting and entering the necessary information into the RPPR forms in eRA Commons or applicable sponsor portal/forms, and for routing the progress report to OSRA for review within the afore mentioned review timeline.

OSRA Specialist - is responsible for reviewing and approving the progress report. For NIH RPPRs, OSRA will submit to the NIH in eRA Commons as the Signing/Business Official on behalf of the contact PD/PI. For all other progress reports that require institutional signature, the OSRA Specialist will obtain AOR signature and return to the PI/Department for submission.

6a. Procedure for NIH RPPRs

Upon receipt of the e-mail reminder from OSRA, the RPPR should be initiated in the eRA Commons by the PI to allow for Department delegates to start collecting the required documents and information. As each award may have specific requirements depending on the NIH award



SOP#	OSRA0005
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mechanism, the PI and Department must consult the NIH RPPR Instruction Guide and the Notice of Award to determine the exact items needed for a specific project's RPPR.

Once all documents and information have been finalized, the RPPR should be routed to the **Signing Official** for WCM. Departments must ensure RPPRs are free of errors prior to routing. If assistance is needed, the assigned Specialist should be contacted.

The OSRA assigned Grants Specialist will claim the routed RPPR and initiate review. If revisions are required, OSRA will provide feedback to the Department and return the RPPR via Commons for edits. If revisions are not required, OSRA will submit the RPPR and share a copy with PI and Department.

A copy of the submitted RPPR will be uploaded to the WRG PT record, and the record status will be updated to "Progress Report Submitted."

6b. Procedure for DOD and NSF Progress Reports

Monthly/Quarterly/Semi-annual or reports other than annual and final are based on the terms and conditions outlined in the award agreement. Departments and PIs need to refer to the award agreement for specific content and formatting requirements.

These reports are technical in nature and do not require AOR review and approval. Principal Investigators and Departments are responsible to prepare and submit the reports directly via www.ebrap.org (for DOD awards) or www.research.gov (for NSF awards) by the timeline outlined in the Notice of Award.

6c. Procedure for All Other Progress Reports

Progress reports that require AOR submission and/or signature must be routed to the OSRA Specialist for review and submission 7 business days before the deadline. The Specialist will review and provide comments or proceed with submission/signature and return a confirmation to PI and Department.

Progress reports that do not require AOR submission are to be prepared by the PI with Department staff support in accordance with the sponsor requirements and should be submitted directly to the sponsor according to the guidance and timeline established in the award agreement. A copy of the submitted progress report should be forwarded to the assigned OSRA Specialist so that a copy can be uploaded into the WRG PT for record retention.

7. Process Metrics

All progress reports that require submission and/or signature by OSRA are due 7 business days prior to the sponsor's deadline. Multi-component RPPRs are due 10 business days before the sponsor's deadline.

8. Special Consideration



Weill Cornell Medicine

SOP#	OSRA0005
Effective Date:	02/01/2024
SOP Owner:	OSRA

Multi-Component RPPRs: Due to the size and complexity of multi-project awards, additional time should be allocated for the preparation and review stages. Multi-component RPPRs must be routed to OSRA within 10 business days of the deadline.

Other Support Pages – For RPPRs, an updated Other Support page is required for Senior/Key personnel that have changes to report since the last reporting period. Examples include if a previously active grant has terminated and/or if a previously pending grant is now active. Any changes from the previous reporting period must be annotated so it is clear what has changed from the previous submission. Each other support page must follow the NIH's current format and include a certified signature from the investigator. Departments are responsible for keeping current levels of effort in check and in compliance with sponsor requirements, and to coordinate with other collaborating Departments as needed to provide the required information for other support pages for the faculty they assist.

Changes in Level of Effort – For RPPRs it must be reported if there will be, in the next budget period, either a reduction of 25% or more in the level of effort from what was approved by the agency for the PD/PI(s) or other Senior/Key personnel designated in the Notice of Award, or a reduction in level of effort below the minimum amount of effort required by the Notice of Award.

Publications - Publications must be compliant with NIH Public Access policy. Publications that fall under the NIH Public Access Policy and are non-compliant must still be reported. The PI is responsible for public access compliance of all the publications listed in section C1 of the RPPR. Generally, it takes weeks to bring non-compliant publications into compliance; PIs are advised to do so as soon as possible to ensure their award is renewed in a timely manner.

Unobligated Balance/Carryover greater than 25% - For RPPRs, it must be reported if there will be an anticipated estimated unobligated balance (including prior year carryover) greater than 25% of the current year's total approved budget. Pls and/or Department delegates must review the spending details on the account and verify the UOB with the Grants Accounting Finance Team (GCA-federal) prior to routing the RPPR to OSRA. OSRA Specialist will assume that amounts informed on the RPPR have been confirmed with GCA.

<u>Special Consideration on unobligated balances:</u> While dollar amounts reported as unobligated balances are a projection for the end of the project period and may include expenses that are not reflected on the NIH payment system, OSRA advises departments to verify unobligated balances with GCA-federal to expedite clarification in case of any discrepancy is identified by the NIH Grants Management Specialist.

eRA Commons IDs – an ID is required for all scientific staff reported on the RPPR (grad student, postdoc, PI). Each individual must ensure their profiles are complete. The PI and/or Department Delegate needs to coordinate with OSRA for any WCM employees that need an eRA Commons ID created or updated. External sites must be contacted for any external scientific staff being reported on the RPPR.

Interim RPPRs - The Interim RPPR is required when submitting a renewal (Type 2) application. If the Type 2 is not funded, the Interim RPPR will serve as the Final RPPR for the project. If the Type 2 is funded, the Interim RPPR will serve as the annual RPPR for the final year of the previous competitive segment. The data elements collected on the Interim RPPR are the same as for the Final RPPR, including project outcomes. These RPPRs are due 120 days from period of performance end date for the competitive segment.



Weill Cornell Medicine

SOP#	OSRA0005
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OSRA does not send reminders about Interim RPPRs. Principal Investigators and Department grant support staff must verify the need to submit the Interim RPPR based on the outcomes of the application review and coordinate with the OSRA Specialist as needed for review and submission of the Interim RPPR.