

KEEPING YOUR PI OUT OF TROUBLE

RAC FORUM SEPTEMBER 4, 2018

PAM MILLER, SPO

HANNAH HOLLOWAY, CSS RA

ANGIE MARTINEZ, SPO



AT RISK PRINCIPAL INVESTIGATORS



NEW TO THIS
STUFF



VERY BUSY

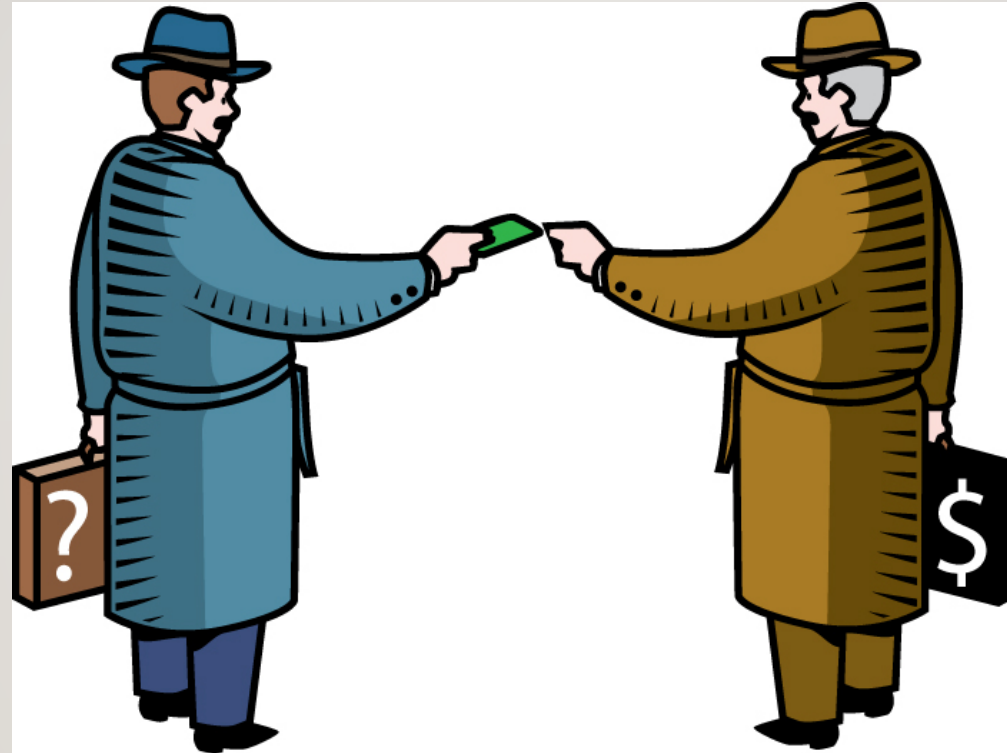


Sponsored
Projects
Aren't Gifts



Sponsors
Expect
Deliverables

In Return
for \$
Support



Sponsors
Expect
Reports

DELINQUENT REPORTS CAUSE TROUBLE



TYPES OF DELINQUENT REPORTS

- **Interim/Final Technical**
- **Interim/Final Financial**
- **Inventions**
- **Property**
- **NIH Fellowship TN**
- **Other**



WHO IS RESPONSIBLE? FILL IN THE BLANK.

- Technical reports are the responsibility of: _____
- Financial reports are the responsibility of: _____
- Invention reporting is the responsibility of: _____
- Property reports are the responsibility of: _____
- FFATA reporting is the responsibility of: _____



WHAT HAPPENS WHEN A REPORT IS OVERDUE?



VERY UNDESIRABLE OUTCOMES!

- Delay of review and processing of PI's pending proposals
- Delay of processing of additional funding and administrative actions, e.g. no cost extensions for all identified PIs and co-PIs on a given award
- Unilateral closeout of an active grant.
- Withholding support for the institution's other active awards
- Placing the PI's institution in a debt status to the U.S. government.

SPONSOR “REPORT COLLECTING” TACTICS



**I'LL BE
BACK!**

SPONSOR “REPORT COLLECTING” TACTICS

- The sponsor may send out an advanced notice (usually automated email) to the PI with copy to SPO.
- A sponsor representative contacts the PI/SPO with a reminder (can be multiple reminders)
- The sponsor’s rep alerts SPO that a report/s is/are still delinquent
- The sponsor’s rep issues warnings/dunning letters/unilateral closeout notices
- The “report collector” (may be a hired hand) issues threats

DOE EXAMPLE



Dear _____

I am following up on the status of the Final Property Certificate for the DOE grant DE-_____. Please note that with the given 90 grace period, you have been approximately 190 days overdue to submit this report. The DOE policy is to not tolerate any late reporting, hence, if you fail to submit this report by the **COB Friday, June 15th**, my Contracting Officer will need to sign a letter, notifying the University officials about **suspension of all DOE funding to UC at Berkley.**

NIH FRPPR EXAMPLE



Good Morning,

To date, the Final Research Performance Progress Report (FRPPR) has not been received. Please provide a status as to when the FRPPR will be submitted. As a reminder, the institution is currently in a “**Unilateral Closeout**” status which is in non-compliance with the terms and conditions of the award. Failure to submit timely and accurate closeout documents may affect future funding to the organization. Additionally, **NIH may take unilateral action to close the grant** and/or additional actions, including, but are not limited to, corrective actions, **withholding of further awards, suspension or termination of active awards, or removal of streamlined noncompeting application procedures (SNAP) or automatic carry over authority on active award**

NIH INTERIM RPPR EXAMPLE

- **The progress report is now delinquent and must be submitted immediately via eRA Commons. Year -07 of this grant is scheduled to start 05/01/2018 and the award will be withheld until this Interim RPPR is received.**



NIH TERMINATION NOTICE

- I again need to bring to your attention another delinquent item for UC Berkeley. As you can see below, we have been waiting for your institution to correctly submit a Termination Notice for the above grant for nearly a year now. Several times, Ms. ____ has provided detailed instructions on how to properly complete the form, but it still has not been fixed.

NIH TERMINATION NOTICE



REPORT CONTENT IS IMPORTANT TOO!

FRPPR EXAMPLE:

- Your FRPPR is fine except for one very serious problem. Section I. Outcomes is required to describe the project's accomplishments in a way that the general public can understand the significance of the work.
- Keep the description of outcomes concise and crisp, written for the layman in clear and comprehensible language. Do not include any proprietary or confidential information or trade secrets.
- Aim for Grade 10, so that even a 15 to 16-year-old will be able to understand the results of your research (see our pointers on using plain language to communicate the value of your research).

TEST YOUR REPORT KNOWLEDGE: FILL IN THE BLANKS

- Under current RTC, NSF annual grant project reports should be submitted electronically, via _____, at least ___ days prior to the end of the current budget period to allow adequate time for the Program Officer to review and approve the report.
- Under current RTC, NSF annual grant project reports should be submitted electronically, via **Research.gov**, at least **90** days prior to the end of the current budget period to allow adequate time for the Program Officer to review and approve the report. (It is overdue on day 91.)

TEST YOUR KNOWLEDGE: FILL IN THE BLANKS.

- Under current RTC, unless otherwise specified in the NSF grant award notice, the final grant project report should be submitted electronically, via Research.gov, within ____ days following _____.
- Under current RTC, unless otherwise specified in the NSF grant award notice, the final grant project report should be submitted electronically, via Research.gov, within **120** days following **expiration of the Grant.**

TEST YOUR KNOWLEDGE: TRUE OR FALSE

- NSF requires grant recipients to submit Federal Financial Reports (FFR's) for each award for purposes of final award accountability.
- **FALSE**: NSF procedures have been designed to extract the final financial data from the entries in the Award Cash Management Service (ACM\$).

TEST YOUR KNOWLEDGE: TRUE OR FALSE

- The PI must submit an NIH Interim-RPPR via the eRA Commons if he/she submitted a NIH renewal application on or before the date by which a Final Research Performance Progress Report (Final-RPPR) would have been required for the current competitive segment.
- **True-**In the event that the renewal application is funded, NIH will treat the Interim-RPPR as the annual performance report for the final year of the previous competitive segment. If the renewal application is not funded, the Interim-RPPR will be treated by NIH staff as the institution's Final-RPPR.

TEST YOUR KNOWLEDGE: FILL IN THE BLANK

- NIH Streamlined Non-Competing Award Process (SNAP) RPPRs are due approximately ___ days before the next budget period start date.
- NIH Streamlined Non-Competing Award Process (SNAP) RPPRs are due approximately **45** days before the next budget period start date.
- Final NIH RPPRs are due ___ days from period of performance end date for the competitive segment
- Final NIH RPPRs are due **120** days from period of performance end date for the competitive segment

How Did You Do?



HOW CAN YOU HELP YOUR PI?

CSS RA BEST PRACTICES

- Involvement in technical reporting by the CSS RA varies from unit to unit
- Best Practice: Be PROACTIVE; not REACTIVE
 - Review Phoebe Award Summary (PAS) and award for reporting requirements
 - Provide PI/Co-PIs a list of due dates
 - Calendar reminders & notifications
 - Include upcoming report deadlines with monthly financial reports
- If contacted about a delinquent report, do not delay in contacting the PI

DOE EXAMPLE: PHOEBE AWARD SUMMARY

Reporting Requirements

Reports listed here are final reports only. Please see your award terms for required interim reports and schedules.

Final technical report due:	120 days after expiration
Final intellectual property (patents and inventions) report due:	120 days after expiration

THIS IS NOT ENOUGH



DOE EXAMPLE: REPORTING DIRECTIONS

REPORTING REQUIREMENTS

- a. Requirements. The reporting requirements for this award are identified on the Federal Assistance Reporting Checklist, DOE F 4600.2, attached to this award. Failure to comply with these reporting requirements is considered a material noncompliance with the terms of the award. Noncompliance may result in withholding of future payments, suspension, or termination of the current award, and withholding of future awards. A willful failure to perform, a history of failure to perform, or unsatisfactory performance of this and/or other financial assistance awards, may also result in a debarment action to preclude future awards by Federal agencies.
- b. Dissemination of scientific/technical reports. Scientific/technical reports submitted under this award will be disseminated on the Internet via the DOE Information Bridge (www.osti.gov/bridge), unless the report contains patentable material, protected data, or SBIR/STTR data. Citations for journal articles produced under the award will appear on the DOE Energy Citations Database (www.osti.gov/energycitations).

DOE EXAMPLE: REQUIRED REPORTS (DOE F 4600.2)

- RPPR—Yearly—submit to FAreports@nnsa.doe.gov & email DOE representative
- Special Status Report (favorable and unfavorable events)—within 5 days of event—submit same as above
- Journal Articles--upload via OSTI website within 60 days of acceptance
<https://www.osti.gov/elink-2413>
- Scientific/Technical Conference Paper/Presentation—upload via OSTI within 30 calendar days of publication/proceedings.
- Scientific/Technical Software & Manual—submit via OSTI and computer disk
- Final Scientific/Technical Report: Upload via OSTI after expiration or termination of award.
- Other: Milestone report—same as RPPR

United States Department of Energy Energy Link System (E-Link)

DOE STI Management System

Submission of USDOE Scientific and Technical Information (Step-by-step version of Announcement Notice 241.3)

(For use by Financial Assistance Recipients and Non-Major Site/Facility Management Contractors to submit Final Technical Reports, Accepted Manuscripts of Journal Articles, Conference Papers, and other STI products under an award; reference other [Submission Options](#) for Software and Datasets)

* DOE Award/Contract Number ?

DE-

Other Identifying Numbers ?

* Recipient/Contractor (Organization) ?

* STI Product Type ?

TIPS FROM SPO CLOSE OUT (PART I)

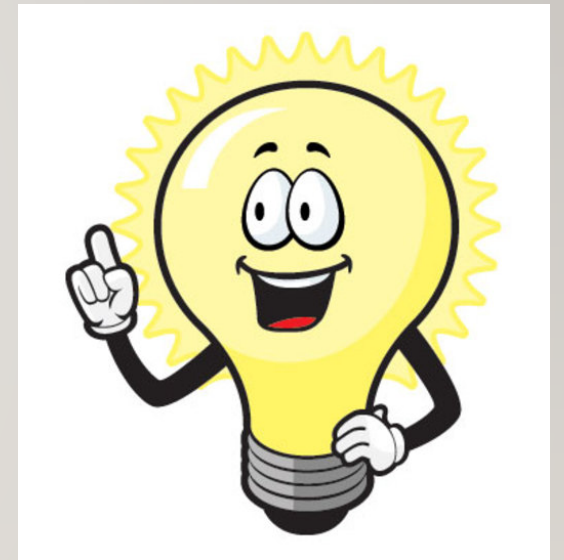
- Take a proactive and timely approach, don't wait to receive an follow-up notification from SPO regarding closeout documents.
- Create a closeout check list in advance reflecting what is needed and when (120 Days, 90 Days, 60 Days, and 30 Days).
- Communicate with Stakeholders that project is ending- Project Director/Principal Investigator (PD/PI), project team, unit purchasing/procurement staff, Single Administrative Point of Contact, Subcontract Partners.
- Review Award Terms – Cost reimbursement, milestone, fixed price, etc. to determine the final invoicing submission to sponsor.

TIPS FROM SPO CLOSE OUT (PART 2)

- Technical Report – Review submission process; discuss schedule with PD/PI and requirement to document submission/completion.
- Invention Reports - Review if there is an invention report required (this is more for non-NIH), and let SPO know when it is due.
- Property Reports- Review if there is a property report required (this is for non-NIH), and let Equipment Management know when it is due.
- Other Deliverables- Discuss schedule and delivery process with PI/PD, and requirement to document submission/completion.

COPING WITH SPECIAL SITUATIONS: ANY IDEAS?

- THE PI IS MISSING
- THE PI DOESN'T CARE
- THE PI ALREADY SENT IN THE REPORT (OR THINKS THEY DID)
- THE PI DOESN'T THINK HE/SHE IS RESPONSIBLE
- THE PI IS HAVING PERSONAL PROBLEMS
- THE PI IS ANGRY WITH THE SPONSOR



DONE!