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1. Introduction

Responsible Officials: Senior Director of Sponsored Programs - Post Award

Effective Date: February 16, 1999

Revision Date: February, 17, 2021

IMPORTANT: For federal awards/subawards issued to Virginia Tech with a start date prior to December 26, 2014, 2 CFR Part 215 (OMB Circular A-110) and 2 CFR, Part 220 (OMB Circular A-21) apply. For all new funds (new awards and new monies, such as continuation awards, supplements, etc. received for existing awards) with a start date on or after December 26, 2014, these new funds are subject to 2 CFR Part 200 (commonly referred to as Uniform Guidance—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) but hereinafter referred to as “2 CFR Part 200”).

Due to the change in federal regulations the language in this procedure specific to the new regulations, 2 CFR Part 200, is highlighted in red font below.

2. Scope

This procedure provides guidance to assure the timely submission of Performance Reports. This procedure applies to all Office of Sponsored Programs (OSP) staff but particularly Post Award Associates (PAAs) that are involved in the administration or use of sponsored award funds.

This procedure is closely related with [OSP Procedure 30005 Sponsored Award Files – Closeout](#).

3. Procedure Statement

The Office of Sponsored Programs (OSP) functions as the steward of Virginia Tech’s research portfolio and is responsible for ensuring that all research proposals and projects comply with university, federal, and sponsor regulations, policies, and procedures. This procedure establishes the expectations and steps necessary to assure Sponsored Award Performance Reports (Performance Reports) are prepared and submitted properly and in a timely fashion.

4. Reason for the Procedure

Principal Investigators (PI's) on sponsored awards are responsible for complying with the Technical Reporting requirements associated with their awards. The university will honor its commitment to assure timely submission of all Performance Reports required by the sponsor award, federal regulation or law. In cases where Performance Reports have not been submitted in a timely manner the Post Award Associate will work with the necessary university officials to encourage the Principal Investigator to comply with the Technical Reporting requirements. According to [2 CFR Part 200.329](#) Monitoring and reporting program performance, the university is responsible for oversight of the operations of the Federal award supported activities and must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and that performance expectations are being achieved.

5. Definitions

OSP Official Electronic File – The electronic file is a mechanism for storage of electronic documents regarding awards associated with Virginia Tech sponsored research. This repository may change its format as technology changes, but the duty of organization, maintenance, upkeep and implementation resides with OSP.

Principal Investigator (PI) – The Principal Investigator (PI) is the primary individual in charge of an award, grant, contract, cooperative agreement, or other externally sponsored activity. The term "project director" is commonly used in relation to education and public service projects, while the term "principal investigator" is commonly used for research projects. Since the terms are generally used interchangeably by the OSP and sponsors, we will use the term "PI."

In many cases, there are multiple investigators included in applications for external funding. However, federal agencies and the university require that one individual be designated as the principal investigator since both the sponsor and the university must have one individual designated as ultimately responsible for the conduct of the project. If co-investigators are named on an application without identifying an individual as the PI, the person listed first is considered the PI by the university and the federal agency.

Normally, all faculty at the rank of assistant, associate, and full tenured and tenure track faculty, as well as Research Faculty in the ranks of research scientist, senior research scientist, project director, and research assistant, associate, and full professor are automatically eligible for PI status. Current information on [Principal Investigator Status](#) can be found on the Research website.

Faculty professionals and Senior Research Faculty ranks not listed above, may be considered for approval for PI status by submitting a completed [Principal Investigator Status Request form](#).

The request may be made for continuous PI status of an active employee or approval of PI status for a specific proposal submission. Criteria for approval is indicated on the [form](#).

Technical Performance Report (TPR) – Commonly referred to as a Technical Performance Report, Technical Report, Performance Progress Reports, or Research Performance Progress Report (see [2 CFR Part 200.329](#)). A TPR is a report of project accomplishments as required by the award documents or other award governing writ (i.e. Federal law or statute). The TPR highlights progress and/or community impact of the award as it progresses throughout its lifespan. The TPR may include both expense related data and quantitative information about the award's impact.

6. Federal Technical Performance Reporting Requirements

The university, through the award's PI, must submit technical performance reports (TPR) at the interval required by the federal awarding agency or pass-through entity to best inform improvements in program outcomes and productivity. TPR intervals are no less frequent than annual nor more frequent than quarterly except in unusual circumstances. PIs should refer to the specific TPR requirements in their award documents. Annual TPR are due 90 calendar days after the reporting period; quarterly or semiannual reports are due 30 calendar days after the reporting period.

Alternatively, the federal awarding agency or pass-through entity may require annual reports before the anniversary dates of multiple year federal awards (see award documents). **The final TPR is due 90 calendar days after the period of performance end date.** If a justified request is submitted by the university on behalf of the PI, the federal agency may extend the due date for any TPR (both the request and the award TPR extension must be in writing).

7. Technical Performance Reports (TPR) Monitoring and Support

- Each potential award will be reviewed to ensure that the award provides a scheduling of TPR, if applicable, that is acceptable and achievable to the university. When the award document requests TPR more frequently than a quarterly basis, the Contracts Associate will contact the PI for approval and formalize the understanding in a faculty agreement before executing the award agreement.
 - The PI will be provided a copy of the award document which includes the reporting requirements.
 - If an invoice has been submitted and not paid because of a delinquent TPR, the PI will be notified that the TPR needs to be submitted. The PI will also be notified that a copy of the transmittal letter and/or cover page should be forwarded to the Office of Sponsored Programs (OSP) for award file documentation. All actions will be documented in the OSP Official Electronic File for the award.
 - Post Award Associates with awards in closeout status which have unmet cost sharing commitments or have delinquent TPR will bring them to the attention of the appropriate Post Award Team Leader or Associate Director.
 - In cases where the TPR and/or deliverable(s) have not been submitted as required in the award document, resulting in payment being withheld, a notification should be sent to the PI. If the TPR is not submitted by the PI in a timely manner, the Senior Director of Post Award should be notified such that the matter can be escalated to the Department Head, and eventually the Center Director or Dean, if necessary.
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8. References

- [2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(Uniform Guidance\)](#)
 - [OSP Procedure 30005 Sponsored Award Files – Closeout](#)
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9. Contacts

- Senior Director of Sponsored Programs - Post Award

Office of Sponsored Programs
North End Center, Suite 4200
300 Turner Street NW
Blacksburg, VA 24061
540.231.9372

- **Associate Vice President for Research and Innovation, Sponsored Programs**
540.231.5281

10. Roles and Responsibilities

- **Principal Investigators (PIs):**
 - The PI is ultimately responsible for management of the award and, as such, must assure that Performance Reports are prepared and submitted in a timely manner in accordance with the award documents, federal law or regulation.
- **Department Administrator/Business Support Center/Fiscal Officer (Department)**
 - Assist OSP in assuring Performance Reports are prepared and submitted in a timely manner in accordance with the award documents, federal law or regulation.
- **Office of Sponsored Programs**
 - Assist PIs in assuring Performance Reports are prepared and submitted in a timely manner in accordance with the award documents, federal law or regulation.
 - Submit required financial reports to the sponsor no later than the due date specified in the award document. OSP is responsible for preparing and submitting all interim and final financial reports to awarding sponsors using information provided in the Banner Financial System.
 - Maintain appropriate files and documentation in support of negotiated awards and agreements.

11. Dissemination

This procedure may be posted on a Virginia Tech internet accessible site. Open public dissemination of this procedure is allowed.

12. Approval and Revisions

This Procedure has been approved by the Director, Office of Sponsored Programs on February 16, 1999.

This Procedure was revised to reflect current working processes by the Director, Office of Sponsored Programs on August 11, 2003.

This revision approved July 1, 2016 and awaits final approval by Assistant Vice President for Sponsored Programs. This revision updates the formatting of the procedure, brings the procedure into compliance with [2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(Uniform Guidance\)](#) and other edits for clarity and title changes.

Revision approved by Associate Vice President for Research and Innovation, Sponsored Programs on 2/17/21. This update is for Uniform Guidance sections numbers.

The official version of this information will only be maintained in an on-line web format.

Any and all printed copies of this material are dated as of the print date.

Please make certain to review the material on-line prior to placing reliance on a dated printed version.
