



SAINT LOUIS
UNIVERSITY

SAINT LOUIS UNIVERSITY

Reporting POLICY

Policy Number: RD-007

Classification: Sponsored Programs

Responsible University Office:

Vice President for Research

Version Number:

Effective Date: 03/31/2010

1.0 INTRODUCTION

In addition to technical reports and other reports required by sponsors, the University is required to report the financial status of sponsored awards accurately and on time as delineated in the award agreement. Federal sponsors in particular pay close attention to reports that are not submitted timely and may even delay or reduce funding if the University's performance in timely reporting is not consistent. This includes the closeout process of awards which typically include final reports. The Office of Sponsored Programs Administration (OSPA) is responsible for reporting and closeouts at Saint Louis University.

2.0 PURPOSE

To ensure that Saint Louis University complies with all reporting requirements of federal regulations and sponsored awards.

3.0 DEFINITIONS

Office of Research Services: (ORS) University office responsible for pre-award activities and programmatic issues with sponsors before and after the University has received an award

Office of Sponsored Programs Administration: (OSPA) University office responsible for Post award activities and financial issues with sponsors after the University has received an award.

Technical Reports: Reports required by the sponsor related to completion of the program purpose that include, but are not limited to, the submission of program results, data, statistics, benchmarks, milestones, and projections.

Programmatic Reports: For the purpose of this policy, programmatic reports are the same as Technical Reports but also could include inventions reports, equipment reports, and any other non-financial reports required by the sponsor or award document.

Financial Reports: Reports required by the sponsor that delineate the financial status of a project obtained from the official records of the University.

Closeouts: Reports done at the end of a Sponsored Program that summarize the financial performance of the sponsored award, and ensure all processes have been completed prior to archiving the grant documents. This is an OSPA process with little input from the departments.

4.0 APPLICABILITY

All Sponsored activity at Saint Louis University.

5.0 POLICY

- 5.1 It is the policy of Saint Louis University that all reports required by sponsors will be filed on time as required by federal regulations and specific sponsored award agreements.
- 5.2 The Office of Sponsored Programs Administration (OSPA) is responsible for the accumulation of data, review, and submission of all financial and non programmatic reports for the University. (See Policy: Sponsored Programs)
- 5.3 The Principal investigator (PI) and their department are responsible for the accurate and on time submission of all technical, programmatic and any other reports required by the sponsor. (See Policy: Sponsored Programs)
- 5.4 All financial and non programmatic type reports submitted to sponsors will be direct reflections of the data contained in the official accounting records of the University.
- 5.5 All financial, technical, and programmatic reports are reviewed by OSPA Management, or ORS Management, by someone other than the individual who prepared the report, for accuracy and completeness before submission to the sponsor. The review must be documented by signature and date the review was completed. A copy of the financial report is retained in the award file. Technical and programmatic reports will be uploaded into the University's ERS system, and review evidenced by electronic signatures.
- 5.6 The Director of Sponsored Programs Administration may authorize reports to contain data that includes accruals and recorded entries that have not posted if the circumstances are deemed appropriate and follow generally accepted accounting principles.

- 5.7 PI's may not withhold required reports from sponsors due to disagreements. The PI must notify the OSPA of any disagreements with the sponsor related to the acceptability, or delay in submission of technical reports.
- 5.8 If a sponsor refuses payment due to non-compliance with the reporting requirements by the PI, the home department of the PI will be responsible for the unreimbursed expenses related to that sponsored award. The OSPA will initiate the cost transfers and send a courtesy copy to the PI and department. (See Policy: Cost Transfers)
- 5.9 Documentation from the accounting system that supports the values on submitted reports must be attached to a copy of the report and filed in the sponsored awards work file.
- 5.10 PI's and departments must ensure all costs related to a specific award are recorded accurately, and at the point of the transaction.
- 5.11 Department personnel must complete and finalize all entries, transfers, and charges to sponsored awards no later than 30 days after the end date of the award.
- 5.12 Grant Accountants in the Office of Sponsored Programs Administration will accept entries, transfers, and charges to sponsored awards from the department up to 30 days after the end of the period of availability.
- 5.13 Grant Accountants in the Office of Sponsored Programs Administration must complete their closeout process within 30 days after the department end date.
- 5.14 Grant Accountants in the Office of Sponsored Programs Administration must submit final reports and invoices, as well as closeout the award no later than 90 days after the period of availability of the award.
- 5.15 The Director of the Office of Sponsored Programs Administration may authorize grant accountants to file amended reports and/or final reports should the facts and circumstances of the situation make such an amended filing appropriate. **Non compliance by departments for entries, transfers, and transactions will not on its own constitute an appropriate reason to amend reports.** Costs incurred for a sponsored award but not captured in an appropriate manner will have to be charged to the related department in non grant funds.

6.0 RESPONSIBILITIES

- 6.1 Office of Sponsored Programs (OSPA)
- Monitor Milestones in Banner monthly for compliance with reporting requirements
 - Prepare closeouts or reports from data contained in Banner Accounting system
 - Perform reviews of financial data for accuracy and completeness

- Submit closeouts and reports timely based on the requirements of the sponsored Award
- Provide assistance to PI in resolving issues and disagreements with sponsor

6.2 Department

- Record transactions properly, accurately, and at the point of the transaction
- Assist PI in preparing and submitting technical reports as needed
- Assist OSPA with data for financial reports as needed
- Complete final entries, transfers, and any other transactions within 30 days after the period of availability.

6.3 Principal Investigator (PI)

- Prepare and retain technical reports in accordance with the conditions of the award
- Upload copy of technical report in University's ERS system
- Review financial reports as required and ensure that corrections are made in a timely manner.
- Notify SPO of disagreements or issues with sponsors

7.0 SANCTIONS

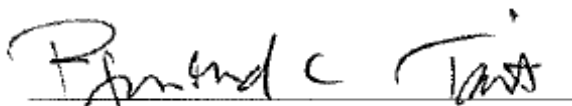
Costs not reported to sponsors will be borne by the departments that generated the activity.

APPROVAL SIGNATURES

This policy was developed by:

The Office of the Vice President for Research

This policy was approved by:


 Raymond C. Tait, Ph.D.
 Vice President for Research
 Saint Louis University

March 31, 2010
 Date

Revision History		
Effective Date	Version	Modification
March 31, 2010	1.0	New Document