Sponsored Project Grant Progress Reports/Noncompeting Continuations and/or Continuation Budgets for Multiyear projects

Purpose: The purpose of this operating procedure is to clarify and define the roles of the Principal Investigator (PI), Department Administrator (DA), and the Grants Proposal Specialist (GPS) in Sponsored Research Administrative Services (SRAS) with regards to submitting progress reports and requested continuation reports, budgets, or related documents for multi-year awards to the extramural funding sponsor. The PI and DA work with the GPS to revise the budget and the budget justification, as needed, for multi-year projects and to submit requested information about the progress of the project to date. The Office of Sponsored Projects Administration (OSPA) has the final authority on all budgets being submitted for extramural funding and   interpreting all federal and sponsor guidelines and regulations.

The purpose of the revised budget and justification, often included in the progress report and noncompeting continuation application, is to outline and detail all expenses required to achieve project aims and objectives for continuing years of the grant project. University of Kentucky budgets must comply with federal regulations, which are codified in a single guidance document known as the "Uniform Guidance" or 2 CRF 200, which must be used by all federal agencies. The Uniform Guidance (UG) provides standards to determine whether costs can be charged to federal grants and how those costs should be distributed between direct costs and facilities and administration (F&A) costs.   Each federal agency has or will issue more detailed guidelines as to how the UG applies to its grants and cooperative agreements.

The UG requires that all funded expenses must be (1) reasonable, (2) allocable to the project, (3) given consistent treatment, and (4) conform to any limitations or exclusions set forth in the UG or the award requirements.

Introduction: Grants and contracts for sponsored projects represent a contractual obligation between the sponsor and the University for the performance of a specific activity through which the sponsor is entitled to receive some consideration or benefits. The contractual obligation is normally documented by a proposal and award combination, contract, or a written memorandum of agreement.   The University assumes full legal responsibility for complying with all requirements imposed by the sponsor upon acceptance of grants and contracts for sponsored projects, including a requirement for a report of expenditures or a provision for an audit. In turn, the College of Medicine must ensure its faculty members are in compliance with all University and sponsor requirements.

Sponsors often require submission of an annual progress report, updated budget, or non-competing continuation application to detail the progress of the project to date and the need for continued funding for completion of the project. The GPS will offer to assist the PI with the progress report and provide it to OSPA, if the PI would like OSPA to submit the progress report or in cases where the sponsor requests submission by OSPA as the authorized university signatory.

This SOP applies to progress reports and continuation applications that are not subject to the National

Institutes of Health (NIH) Research Performance Progress Report (RPPR) online progress reporting system or the Health Resources and Services Administration's (HRSA) Electronic Handbook (EHB) online progress reporting system. This SOP applies to progress reports and continuation applications that are submitted through NIH's online submission platform, ASSIST, as well as to reports due to non-NIH sponsors, such as foundation or state sponsors as well as federal agencies other than NIH or HRSA. Separate SOPs apply to NIH RPPR and HRSA progress reports.

Note that these procedures are subject to sponsor-specific requirements for the items discussed below.

Procedure: Progress reports and non-competing continuation applications typically include a revised budget, often with a detailed breakdown of the continued financial support requested from the sponsor. The PI must ensure that the revised budget reflects the best estimate of the funding requested to complete the tasks outlined in the proposal, and for continued success of the ongoing project. Based on sponsor requirements, a detailed budget may or may not be required.

Planning

1. The PI or DA must alert the GPS as soon as possible of upcoming progress reports for existing or ongoing projects or noncompeting continuation applications, including information from the sponsor (guidelines, instructions, etc.) and deadline.
2. As soon as the GPS becomes aware of a progress report or noncompeting continuation application, he or she must alert the Research Administrator (RA) of the PI's plans and shares the guidelines or instructions.
3. The GPS will coordinate with the DA on the level of involvement the DA will have in the progress report submission process. This SOP assumes that the DA is involved in the review and approval of the progress report and any revised budgets.

Preparation

1. The GPS will review requirements and guidelines provided by the sponsoring agency for completion of the progress report or noncompeting continuation application and provide support and feedback to the PI in budget preparation as needed (see the "Sponsored Project Budget Development" SOP).
    a. The GPS will review the guidelines and any other related instructions and highlight important requirements or restrictions to the PI and DA. The RA in OSPA will also be reviewing, and should be aware of any ongoing items such as:
        i. Eligibility
        ii. Any special restrictions
        iii. The completion of odd forms or anything specific that needs to be included in report
        iv.   Review F&A rate, budget restrictions or limitations (including cost share)
    b. The GPS will coordinate with the PI and DA for a proposed timeframe for preparing the progress report, and budget, justification and any other related documentation, if needed.

Define Budget Needs / Framework and Develop Budget Justification

1. As needed, the GPS will ensure the revised budget is prepared in accordance with the UG and any pertinent University or sponsor requirements.

2. The GPS will assist the PI in revising the budget as needed.
    a. The PI will let the GPS know what adjustments may be needed regarding the next year's budget. The GPS can assist with questions the PI may have. The GPS can also facilitate guidance from the SRAS Post-Award Grants Analysts and Reconciler and Sponsored Projects Accounting (SPA), if needed.
    b. If a budget is needed, the GPS will assist the PI per the "Sponsored Project Budget Development" SOP.
    c. The DA will have an opportunity to review and approve any revised budgets.

3. If the GPS, DA or the PI identifies that the new year's budget will constitute a 25% or more change in the budget from the previous eIAF, then the GPS will coordinate with the PI and DA and initiate a new eIAF. Per OSPA policy, a new eIAF is required when the total budget changes by 25% or more from the previous eIAF for a project. The addition of a new investigator or senior key personnel or change in enrichment will also require a new eIAF. Please see the "Internal Approval Process via eIAF for Non-Clinical Trial Sponsored Project Grant Proposals/Application" SOP.

4. If a revised budget is needed, the GPS will prepare a final modified budget for PI and DA review and approval. Once the PI and DA provide approval, the budget can be used for submission to the sponsor and/or as an attachment to a new IAF.

Compiling Progress Report

1. If the PI would like the GPS's assistance in completing the progress report, the "Sponsored Project Proposal Preparation" SOP provides guidance for the completion of any materials or noncompeting applications that are associated with the progress report. The PI must delegate appropriate access for completion of administrative and financial items if a sponsor has an online submission platform.

2. Depending upon the sponsor's progress report requirements, there may be institutional or administrative information as well as budget information that the PI or the GPS, with the PI's input, may complete. The GPS will coordinate with the PI and DA regarding the completion of this information.

3. If the GPS provides assistance with respect to the progress report, the GPS will alert the PI when he or she has completed the above-referenced items within the report and provide the PI and DA an opportunity to review and approve the completed report.

4. If the PI completes the progress report without the assistance of the GPS, then the PI will provide the final version of the progress report or noncompeting continuation application for GPS review.

Progress Report Submission

1. Once the GPS has reviewed the progress report for compliance with sponsor requirements and any applicable UK or other policies and the GPS has secured PI and DA approval of the report, then the GPS will provide the report to the OSPA RA and verify submission to the sponsor.

2. The RA will review the progress report and provide any approvals or signatures that are needed.

3. Once the RA has approved the progress report, then, depending upon sponsor requirements, either the PI or RA will submit the progress report to the sponsor. The GPS will provide any troubleshooting that may be necessary to ensure a successful submission.

4. If an email copy of the report is submitted by OSPA to the sponsor, the GPS will ensure that the emailed report is legible and will call any visual quality issues to the PI's attention and will see the issue through to resolution. .

5. The PI or the RA will alert the GPS of the need to submit supplemental information to the sponsor. The PI will draft this information and forward it to the GPS for review. The GPS will ensure compliance with sponsor guidelines and work with the PI and DA to finalize the information. With the PI's concurrence, the GPS will provide the information to the RA for institutional submission and, if needed, will inform the PI of the successful submission to the sponsor.

I. ROLES AND RESPONSIBILITIES

Principal Investigator (PI) is responsible for:
- Notifying the GPS of progress report and noncompeting continuation application requests.
- Delegating appropriate access to GPS regarding sponsor's online submission platform, if any.
- Defining revised budget needs and framework.
- Completing budget justification or other materials, if needed.
- Coordinating with the GPS if a revised eIAF is needed.
- Coordinating with GPS regarding any assistance needed in completing institutional or financial information in progress report.
- Reviewing and approving the progress report and any revised budgets that may be necessary.
- Reviewing scope of work if a project is funded.
- Consulting with the GPS if budget has changed.
- Alerting the GPS if any supplemental material is requested by the sponsor.

The Department Administrator (DA) is responsible for:
- Along with the PI, notifying the GPS of upcoming progress reports.
- Coordinating with the GPS if a revised eIAF is needed.
- Reviewing and approving the progress report and any revised budgets that may be necessary.
- Reviewing and approving any supplemental information that has been requested by the sponsor.

The Grant Proposal Specialist (GPS) is responsible for:
- Notifying the OSPA RA of upcoming progress reports.
- Coordinating with the DA, to determine the DA's level of involvement.
- Reviewing instructions or guidance for completion of the progress report or noncompeting continuation application.
- Assisting PI in updating budget justification by reviewing sponsor requirements and asking standard questions per "Sponsored Project Budget Development" SOP.

- Ensuring any revised budgets are in accordance with UG, UK and sponsor policy.
- Facilitating guidance from the SRAS Post-Award Grant Analyst and Reconciler or SPA, if needed.
- Preparing the eIAF for continued year funding, if needed.
- Securing PI and DA approval of the progress report and any revised budgets.
- Coordinating of progress report or noncompeting continuation application submission with RA in OSPA, whether paper or electronic.
- Alerting PI and DA of successful submission of the report.
- Assisting the PI with any supplemental material requested by sponsor and forwarding that to the RA for submission, as needed.

Abbreviations
DA—Department Administrator
EHB—Electronic Handbook (HRSA's online application and grant reporting system)
eIAF—electronic Internal Approval Form
HRSA—The Health Resources and Services Administration
F&A—Facilities and Administration rate (indirect cost rate UK negotiates periodically with the federal government that is applicable to most grants)
GPS—Grants Proposal Specialist (located in Sponsored Research Administrative Services)
NIH—National Institutes of Health
OSPA—Office of Sponsored Projects Administration (located in the Vice President for Research Office)
PI—Principal Investigator
RA—Research Administrator (in OSPA)
RPPR—Research Progress Performance Report (NIH's online progress reporting system)
SPA—Sponsored Projects Accounting
SRAS—Sponsored Research Administrative Services