



# RUTGERS

Office for Research

January 25, 2022

Dear Principal Investigator,

Revisions to the Uniform Guidance, 2 CFR§200.344, effective November 12, 2020, require federal awarding agencies to report to the Federal Awardee Performance and Integrity Information System ([FAPIIS](#)) all awards with overdue project reports one year after the award end date. The revisions reflect a renewed focus on improved stewardship and ensuring that the American people are receiving value for funds spent on grant programs.

The Principal Investigator (PI) of a Sponsored Program award is responsible for preparing and submitting all required technical reports as outlined in the award including progress and final report(s). Failure of the PI to submit timely reports can result in sanctions against the PI and the University. Inclusion in the FAPIIS database may increase administrative burden on the PI and the University and negatively impact funding from all federal sponsors to Rutgers University.

The following outcomes may result when annual and/or final reports are not received by the deadline:

**1. *The loss of expanded authorities on current and future awards.***

Expanded authorities empower Rutgers Research and Sponsored Programs staff to approve certain administrative actions on sponsored programs, such as budget revisions and no-cost time extensions. Without expanded authorities, all such requests require sponsor prior approval in writing, which add administrative burden and may significantly delay work on the project.

**2. *Delays in the University receiving payments or sponsor refusal to pay outstanding invoices.***

Most awards are paid on a cost-reimbursement basis. This means the University advances money to the project and then invoices the sponsor for payment. Until payment is received, the University carries the debt for costs already incurred. Failure to receive required technical reports is frequently the reason given by sponsors for not paying invoices in a timely fashion. Any costs disallowed by the sponsor due to the PI's failure to submit required reports according to the sponsor's schedule will be the responsibility of the PI's unit head (dean or center/institute director).

**3. *Sponsor designation of the University as a high-risk awardee.***

When a project is declared "high-risk" by the sponsor, the PI is not allowed to spend any grant funds without specific approval from the sponsor. This usually involves submitting requests to the sponsor on a periodic basis, outlining the proposed activities for the period and including a budget and budget justification that explains how the proposed expenditures relate specifically to the project's goals and objectives. Work cannot proceed and costs cannot be incurred until the sponsor has approved in writing the specific activities and budget outlined in the request, even though the expenses were spelled out in the originally approved budget. The PI of a high-risk project also must submit detailed programmatic and financial reports for sponsor approval in order for the

University to receive payment of invoices. The high-risk designation indicates that the sponsor has serious concerns about the PI's and University's ability to manage projects, and therefore endangers the receipt of future awards from that sponsor as well as from other federal sponsors.

**4. *The loss of external funding from that sponsor, not only to the individuals involved but to other University investigators as well.***

In some cases, sponsors will discontinue funding and terminate the project due to delinquent reporting. Some sponsors will refuse to make new awards to anyone at the University as long as there are any delinquent reports on currently funded projects.

Because of these serious repercussions, it is incumbent upon the PI to make sure all reports are completed and submitted to the sponsor on time. Generally, final reports are due to the sponsor within 90-120 days of the project end date, although some awards allow less time. If additional time is needed to complete the final technical report, the PI should contact Research and Sponsored Programs staff at least 60 days before the project end date to discuss requesting an extension of the project. Note: When submitting reports, PIs must provide Research and Sponsored Programs a copy and confirmation of submission.

Working together to ensure that PIs and the University comply with the reporting requirements for externally funded projects is imperative.

If you have any questions or need additional information about these requirements and procedures, please contact your Research and Sponsored Programs [Grant Specialist](#) or the following individuals:

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Sincerely,

Research and Sponsored Programs