COLUMBIA UNIVERSITY

# LDEO Department:

**Contracts and Grants** 

Effective Date: 09/01/2010

Standard Operating Procedure:

Reporting Compliance



### **Summary:**

As a condition of its acceptance of funding from a sponsor, the University is obligated to undertake certain stewardship activities and to ensure compliance with federal, state and local laws & regulations, University policies and with sponsor restrictions. Adherence and compliance to sponsor requirements is of the utmost importance because it demonstrates to a sponsor the University's commitment to partnership and creates a positive impression of the University, Principle Investigator (PI) and sponsored projects personnel. The continued compliance by the University establishes a reputation of a highly responsible and well-managed organization.

The purpose of this Standard Operating Procedure (SOP) is to define the method by which the Lamont-Doherty Earth Observatory (LDEO) Contracts & Grants Office tracks required deliverables for compliance with award terms and reporting conditions.

The timely submission of all reports (e.g., monthly, annual, interim, final, and project outcome) is a shared responsibility between the PI, Department/Division Administrator (DA) and LDEO Contracts & Grants. Upon receipt of the notice of award (NOA) and the Project Information Notice (PIN) form from the University Sponsored Projects Administration (SPA), tracking of deliverables begin immediately.

Each member of the Contracts & Grants is assigned specific divisions and/or departments located at LDEO to monitor. The Manager of Contracts & Grants, each Project Coordinator (3) and the Administrative Assistant have developed their own spreadsheets that track the awards that belong to their assigned departments (See Attachment A). Monthly notification is sent out via email and/or hard copy to all PIs and DAs identifying the award, the report due, and method of submission (See Attachment B). Spreadsheets are updated upon receipt of any new PIN from SPA that would identify a change to an award.

Some awards contain Terms and Conditions (T&Cs) that address issues beyond timing, such as requiring certain actions, or dictating additional communications with sponsors. In these cases, the T&Cs are specifically identified during the Award Kickoff meetings. The PI is responsible for developing a plan for tracking and completing the T&Cs.

### **Definitions:**

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DA	Department/Division Administrators
InfoEd	University system for sponsored award management
LDEO	Lamont-Doherty Earth Observatory
NOA	Notice of Award. Grant, cooperative agreement or fully executed contract.
PI	Principal Investigators
SPA	Sponsored Project Administration. The Columbia central administration department
	responsible for all institution level preaward review and approval and certain
	postaward transactions and sponsor communication.
PIN	Project Information Notice. Internal Columbia form created in InfoEd, stored in
	ReportWeb and fed into ARC. Departments run their own PIN upon notification from
	ARC that a project has been setup or modified.
SPF	Sponsored Finance Administration. The Columbia central administrative department
	responsible for financial post award activities such as financial reporting, invoicing and
	cash draw downs.

#### **Procedure:**

#### Report due date tracking

- Each member of Contracts & Grants is expected to review the NOAs to identify the award reporting requirements and due dates.
- Each member of Contracts & Grants is responsible for understanding what the due date requirements are for multiple funding sources, as well as the method of submission for each agency.
- Each member of Contracts & Grants is required to maintain department specific excel spreadsheets capturing award detail, list of PIs, period of performance, reports and due dates.

#### Notification of upcoming reporting due dates

- Notifications are sent out to PIs, CO-PIs and DAs via email and/or hard copy, during the 1<sup>st</sup> week of every month for all reports due the following month.
- Each member of Contracts & Grants is expected to continue to follow-up via email and/or phone calls with PIs and DAs until reports are submitted and copies have been received and logged appropriately.
- Each member of Contract & Grants continuously updates their respective excel spreadsheets as notifications are released and reports are submitted.

#### Reporting non-compliance escalation process

• Utilizing the department specific detailed report tracking spreadsheets discussed above, a cohesive list of all overdue reports is assembled monthly. Each member of Contracts & Grants is expected to add their overdue reports to one spreadsheet. The task of reviewing the spreadsheet before distribution is assigned to a specific Project Coordinator and the

Administrative Assistant. The list of overdue reports is then distributed to the following individuals for assistance with PI reporting compliance (See Attachment C).

- LDEO: Associate Directors of each division/department Director of the Observatory Deputy Director for Research Management Assistant Director of Finance & Administration Division Administrators
- For informational purposes only the following CU Officials get copies of this report: Executive Director, Sponsored Projects Administration Director, Sponsored Projects Finance

#### **Reporting non-compliance enforcement**

In all instances of receipt of a budget and proposal application package for review, the LDEO Contracts & Grants Project Coordinators cross check the proposal participants against the overdue report list. If the PIs are flagged with an overdue report they are immediately notified that their report must be submitted to avoid proposal submission delay. The review of the new proposal continues but the proposal will not be released until the overdue report is submitted.

#### **Escalation Procedure:**

Disagreements regarding the interpretation or enforcement of an LDEO SOP will be resolved internally at LDEO by conferring with either the Assistant Director for Finance and Administration or the Observatory Director. Questions regarding University Policy will be referred to an appropriate party within the University's Central Administrative Departments. In the event an employee does not comply with University policy or procedure they would initially be subject to a verbal warning by their supervisor. Repeated failure to comply can result in further disciplinary action, such as a written warning or an unfavorable performance review, up to and including termination of employment.

Roles and Responsi					
	Manager Contracts &	Project	Administrative		
Tasks	Grants	Coordinators	Assistant	PI	DA
Notify PIs and DAs of report due dates	Perform	Perform	Perform		
Update spreadsheets upon receipt of NOAs, and SPBAs	Perform	Perform	Perform		
Report Submission				Perform	
Follow-up on delinquent report submissions	Perform	Perform	Perform		
Provides copies of all submitted reports to LDEO Contracts & Grants				Perform	Perform

#### **Roles and Responsibilities:**

Generate a complete list of overdue reports	Perform	Perform	
Escalate list of			
overdue reports to	Perform	Perform	
upper management			

### **Attachments:**

Attachment A - Sample of Detailed Report Tracking Spreadsheet

Attachment B - Sample of Monthly Notification

Attachment C - Sample of Comprehensive List of Annual Overdue Reports & Final Reports

### **Document History:**

Date	Name	Action	Notes
9/1/2010	M. Respo	Created	
5/12/2011	M. Respo	Edited	
11/9/2012	E. Soergel	Edited	
11/25/2012	M. Respo	Edited	

### ATTACHMENT A

#### MONTHLY REPORTING LIST

Image: state in the state i	Contract & Grant Award No.	Pls	Project Number	Effective Date	Termination Date	Amount Received	Comments	Monthly Reports	Annual Progress Report	Final Report	Project Outcome Report	Notification Due
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### ATTACHMENT B

## LAMONT-DOHERTY EARTH OBSERVATORY

### **CONTRACTS AND GRANTS**

#### **INTEROFFICE MEMO**

TO:

FROM:

DATE:

SUBJ:

According to our records, you are due a funding increment of \$XXXX for this grant. The expiration date of the above referenced grant for the current period is XXXXX.

In order to obtain your increment and ensure continuity of funding, NSF requires that an annual progress report be submitted via Fastlane, at least 3 months prior to the expiration date stated above. (Note: Unless this progress report is submitted, processing of your next increment will not be initiated.)

Your progress report is due at NSF on XXXX.

PLEASE SEND A COPY OF THE REPORT TO THE CONTRACTS OFFICE FOR OUR RECORDS. A SIGNED RASCAL ROUTING SHEET SHOULD BE INCLUDED.

Thank you,

#### MONTHLY REPORT REMINDER

#### **"\*\*\*SAMPLE\*\*\***"

## Subject: MONTHLY REPORT REMINDER From: Maribel Respo <mrespo@admin.ldeo.columbia.edu>

Date: Mon, 15 Nov 2010 12:57:02 -0500

To:		
CC:		

Please note you have a monthly report due at NSF to be submitted by way of email to Steve Meacham due December 1, 2010. The report should contain a update on activity to date.

Steve Meacham - Email address: smeacham@nsf.gov

Please copy me on the submission so that I can document our compliance with our terms and conditions of award OIA 09-63217.

Let me know if you need assistance.

Thanks Maribel

> Maribel Respo <<u>mrespo@admin.ldeo.columbia.edu</u>> Manager Contracts & Grants Lamont-Doherty Earth Observatory of Columbia University

> > 12/20/2010 9:23 AM

## ATTACHMENT C

#### MONTHLY LIST OF OVERDUE ANNUAL REPORTS

C&G Contact	Principal Investigators	Award Number	Title	Report Period	Date Due	Comments
Rachel Young	Division 10 - Sandra Tiwari					
	Division 40 - Bonnie Bonkowski					
	Division 40 - Donne Donkowski					
	Division 66 - Ellen Foy					
Theresa Sencen	Division 11 - Ira Messer					
	Division 20 - Linda Fingerson					
Annette Higgins	Division 15 - Jean Economos					
	Division 30 - Moanna St. Clair	I		1		
Maribel Respo	Division 50 - June Tallon					

FOOTNOTES:

NSF Annual Report due 90 days prior to end date. Must be submitted via Fastlane.

NASA Annual Reports due 60 days prior to end date. May be submitted via fax, email or mail to Grant Officer and Technical Officer.

NOAA Annual Reports due 90 days prior to end date. Must be submitted via grants.online.

ONR Annual Reports as required. See award document for mailing address.

DOE Annual Reports due 90 days prior to end date. Must be submitted via fedconnect.