

## National Science Foundation Grantee Requirements – Progress Reporting August 2024

**Executive Summary:** Lehigh faculty benefit from federal funding, which comes with the responsibility to adhere to reporting requirements set forth in the terms and conditions of their awards. The NSF has begun to crack down more seriously on late reports and failing to submit timely reports can lead to significant delays in funding and processing of new proposals for the researcher(s) in question, *as well as for other Lehigh researchers*. To avoid such issues, Lehigh's Office of Research and Sponsored Programs (ORSP) will be proactively reminding Principal Investigators of their reporting deadlines well in advance of the due date. Failure to comply will result in ineligibility for external and internal funding opportunities, removal from proposals as Senior Personnel, and delays distributing funds from existing awards until outstanding reports are submitted.

As recipients of federal awards for sponsored projects, Lehigh faculty have gained valuable support from our federal sponsors, enabling groundbreaking research, innovations, and discoveries. With this funding comes the important responsibility to manage these resources responsibly and effectively and to abide by the sponsor's regulations, terms and conditions.

Many sponsors require project reports for their awards throughout the life of the project. The NSF, specifically, requires project reports for all assistance awards. Their [Proposal and Awards Policy and Procedures Guide](#) (PAPPG), which is referenced in the terms and conditions of all awards, states that Principal Investigators (PIs) must submit annual project reports prior to the annual performance period end date, no later than 90 days prior to the end of the current budget period, and final project and outcomes reports within 120 days after the award end date.

The annual report becomes overdue the day after the 90-day period ends. Failure to submit timely reports will delay processing of additional funding and administrative actions, including, but not limited to, no cost extensions. In the case of continuing grants, failure to submit timely reports will delay processing of continuing funding increments.

For final reports, if the final annual and outcomes reports have not been submitted by the PI and approved by the cognizant NSF Program Officer within the 120-days period, the report becomes overdue. Failure to provide these reports on a timely basis will delay NSF review and processing of pending proposals for all identified PIs and co-PIs on a given award.

We have recently experienced the enforcement of the overdue reports with one PI's delayed annual report holding up new awards for one of their co-PIs on the award and in another instance, a different PI's delayed annual report, held up the approval of a No Cost Extension (NCE) for another award where they were co-PI. In both of these instances, the completion and submission of these overdue reports rectified the situation, the pending award was released and the NCE was approved.

With this clear enforcement by the NSF, ORSP will be proactively reaching out to PIs to remind them of their obligations well in advance of the due date. Failure to submit your reports, annual or final, prior to the due date will result in the PI being ineligible to submit research and sponsored program proposals via ORSP or to the VPR for the internal grants programs. If they are listed as Senior/Key personnel on any proposals currently in the pipeline, they will be

removed from the proposal before it is submitted by Lehigh to an external sponsor. Additionally, any existing awards on which they are research personnel will not be distributed by ORSP/VPR until they have submitted the outstanding report.

We are hopeful we will not have to take the above action and that, with our additional reminders, all PIs will proactively complete their required reports in advance of the due date.

Please don't hesitate to reach out to [me](#) or your [Contract and Grant Specialist](#) in ORSP for support in this process or for any questions related to this guidance.

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