



Effort Commitments and Salary Charges on Sponsored Projects

POLICY 10.06.05

Effective Date: 10-1-2012

Date Last Revised: NA

The following are responsible for the accuracy of the information contained in this document

Responsible Policy Administrators

Diego Vazquez, Assistant Vice Provost
Research Funding Services

Amy Miarecki, Senior Director,
Post-Award Administration & Compliance

Responsible Departments

Research Funding Services
Office of the Vice Provost for Research

Grant Accounting & Compliance
Department of Financial Services

Contact RFS (508) 856-2119

Policy Statement

It is understood by the UMass Medical School (UMMS) that individuals receiving sponsored project funding will commit and expend effort in support of their project. Federal costing policies and the policies of individual granting agencies require that the Principal Investigator/Project Director of a sponsored project devote measurable effort to the project.

In addition, committed effort to all institutional activities, including sponsored projects, cannot exceed 100% of the effort for which an individual is paid by the Medical School. UMMS faculty are expected to charge their time commensurate with the effort spent on all activities they perform in their academic position. For the purposes of this policy, effort is measured in terms of percentage and not in terms of hours worked.

As a recipient of sponsored awards, UMMS must assure sponsors that the effort expended on a project corresponds with the salary charged to that project and any cost shared effort commitments are provided. Therefore, UMMS certifies faculty effort on sponsored projects by an annual Effort Certification process. The link between salary charged and effort expended is the underlying principle of this system. Salaries charged must match effort expended over the course of the year. Significant variances must be adjusted within the time limits prescribed in [Cost Transfer Policy 05.02.03](#).

Reason for Policy

As part of its risk management and compliance function related to sponsored awards, the University is responsible for ensuring consistency in its effort reporting process.

It is the policy of UMMS that effort committed by faculty on sponsored projects be actively managed so that these effort commitments not only reasonably reflect the time devoted to each sponsored activity, but also allow the faculty member to fulfill his/her other University obligations.

Charges to sponsored projects must be based on the UMMS paid salary and, where appropriate cannot exceed salary caps or other limitations imposed by external sponsors. UMMS is committed to providing clear guidance to faculty and staff regarding maximum level of effort on sponsored projects in order to mitigate risk and ensure appropriate compliance oversight.

Entities Affected By This Policy

This policy is applicable to all employees committed and/or paid from sponsored project accounts. This does not apply to faculty paid through consulting agreements.

Related Documents

- ◆ [OMB Circular A-21, "Cost Principles for Educational Institutions"](#)
- ◆ [NIH Grants Policy Statement](#)
- ◆ [UMMS Cost Transfer Policy 05.02.03](#)
- ◆ [Request for Faculty Exception from 95% Maximum Sponsored Effort Rule Form](#)

Scope

Maximum Levels of Effort: Faculty and Primary Individuals may commit and/or fund up to 95% of their UMMS effort annually on sponsored projects. Only in exceptional circumstances should faculty research effort and salary exceed 95%.

Faculty cannot be committed and/or funded 100% off of sponsored awards if they do ANY teaching, grant writing, serve on committees or perform any other UMMS administrative duties. Exceptions over 95% must be preapproved in writing, on an annual basis, by the Department Chair and the Assistant Vice-Provost, Research Funding Services. See the attached "[Request for Faculty Exception From 95% Maximum Sponsored Effort Rule](#)" Form.

Individuals other than faculty may recover up to 100% of their salaries on sponsored project(s) only if such recovery is commensurate with their duties on the sponsored project(s) and that no duties outside of the sponsored project(s) are performed including preparation of additional sponsored proposals, Medical School committee appointments, or other services to the Medical School. Exceptions may be made for research faculty provided they are approved by the Assistant Vice-Provost for Research Funding Services.

Minimum Levels of Effort: Each Primary Individual shall commit at least 1% effort to each sponsored project, including clinical research studies, in which he or she is responsible for proposing, conducting, or reporting the results of the project. Exceptions to the minimum level of effort requirement may include awards for equipment and instrumentation grants; doctoral dissertation grants, and limited purpose grants such as travel/conference support and administrative supplements. In the case of an institutional training grant, at the time of award effort commitments are required only of the Project Director and those faculty who are actually supervising individual trainees.

Effort Commitments at the Time of Proposal: Prior to proposal submission to an external funding agency or in the case of awards made in the absence of a final proposal, the Department Chair or appropriate unit head should review and approve the effort commitments of each faculty member. Review and approval of proposed effort commitments is deemed to have been made and granted by the Department Chair or appropriate unit head when the UMMS Proposal Routing Form is signed.

Effort Commitments at the Time of Award: At the time of award, it is the responsibility of the PI, department Chair and appropriate administrative designee to ensure that total effort commitments meet the requirements of this policy.

Cost Sharing of Effort: Where effort is committed in a proposal but the corresponding salary is not fully funded by the grant, effort must be reflected for mandatory and committed cost sharing. Federal regulations require that committed cost sharing be tracked, documented and reportable. It is recommended that a cost sharing account be established to capture the cost shared salary within the general ledger. If a separate cost share account is not created in PeopleSoft then it is required that the cost sharing be reported manually during the annual Effort Certification process.

- **Voluntary Cost Sharing of Effort:** UMMS does not typically cost share effort on a voluntary basis, consistent with its objectives of receiving fair compensation from sponsors for research and scholarly activity conducted at the University. A voluntary commitment of uncompensated effort should be made only where the competitive circumstances or perceived institutional benefit of receiving the award are deemed to be sufficiently strong to warrant the commitment. Approval for voluntary committed cost sharing must be obtained from the Vice-Provost for Research. The signature of the Department Chair on a proposal routing form indicates that he/she also has approved any voluntary commitment to cost share effort.

Reduction of Effort Commitments: During the life of an award, when required by sponsor policies, it is the PI's responsibility to obtain University and sponsor prior approval for absences (generally a continuous period of 3 months or more). In addition, a significant (25% or more from the level of effort approved at the time of award) reduction of the PI's and/or other key personnel specifically named in the award requires the prior approval of most sponsors. If a reduction in effort commitment is made, the salary support coming from that award must be reduced commensurate with the effort.

- **No Cost Extensions:** It is the expectation of most sponsors that the PI and key personnel will continue to devote the same level of effort during a no cost extension period as during the original award period. If this is not the case it is the responsibility of the PI, working with Research Funding Services, to obtain, in writing from the sponsor, prior approval for reductions in effort of the PI and/or key personnel (25% or more) at the time of the request for the No Cost Extension.

DHHS Salary Cap: Where an individual's University salary for the period of the Effort Certification exceeds the Department of Health and Human Services salary cap, effort percentages for all DHHS funded sponsored research must reflect the total effort on such research, rather than just the percentage of salary reimbursed from federal grants. Effort in excess of the salary cap should be reflected as cost sharing on the Effort Certification statement.

Responsibilities

Principal Investigators – are required to understand the principles of accurate effort reporting, to be aware of the level of effort committed to a sponsor in relation to all other work, must authorize all necessary HR/Payroll forms and certify annual effort cards for all staff working on their grants. They should work to ensure that payroll distributions are updated in a timely manner for changes in ongoing effort of staff working on their sponsored awards.

Department Administrator - should work to ensure that payroll distributions are updated in a timely manner for changes in ongoing effort of staff working on their departments sponsored awards, ensure effort certifications are completed and processed in a timely manner.

Department Chair – review and approve the Proposal Routing Form, to assure that other activities required of the faculty member will not conflict with the proposed effort commitment and confirm approval of any voluntary cost sharing.

Research Funding Services – ensure that federal awards accurately represent the amount of time that key personnel are committing to the project and will not result in an over commitment of effort on sponsored projects and in accordance with this policy.

Assistant Vice Provost, Research Funding Services – review, approve and provide a copy, to Grant Accounting, of approved requests for exception from the 95% maximum sponsored effort rule.

Grant Accounting – will ensure that level of effort funded from the grant is commensurate with the award notice for all key personnel, keep PeopleSoft key personnel effort commitments accurate and ensure no one is paid from federal grants at a rate above the current salary cap.

Cost Analysis – will review to ensure effort certifications are approved and processed in compliance with policy, sponsor agency requirements, and in a timely manner. This review will include reviewing to ensure level of effort commitments are certified within 25% of committed levels and cost sharing is reported appropriately.

Procedures

Please see "[Request for Exception from 95% Maximum Sponsored Effort Rule](#)" Form for procedures.

Definitions

Effort: The proportion of time spent on any University activity and expressed as a percentage of total time. Total effort for an employee must equal 100%. The University appointment serves as the basis for an individual's total effort. In other words, for a 50% appointment, 100% effort is the 50% appointment.

Faculty: UMMS faculty at and above the rank of Assistant Professor (e.g., Department Chairs, Associate Professors, Research Assistant Professors, and Clinical Professors). This policy does not apply to faculty paid through consulting agreements (non-payroll payments).

Committed Effort: The amount of effort proposed in a grant or other project application and accepted by a sponsor, regardless of whether salary support is requested for the effort.

Maximum Level of Effort: The maximum level of effort that can be committed and/or funded on sponsored projects during a 12-month period. For the purposes of this policy the maximum level of effort committed/and or funded on sponsored projects is limited to 95% of a maximum of total UMMS effort. Only in exceptional circumstances should faculty research effort and salary exceed 95%.

Minimum Levels of Effort: The minimum level of effort that can be committed and/or funded on sponsored projects during a 12-month period. Each Primary Individual shall commit at least 1% effort to each sponsored project, including clinical research studies, in which he or she is responsible for proposing, conducting, or reporting the results of the project.

Primary Individual: A Primary Individual is a person listed as a principal investigator (PI), project director, co-investigator, co-project director, or those with comparable responsibilities on a sponsored project. A Primary Individual typically, but not always, carries an academic (i.e., faculty) appointment.

Proposal Routing Form: The UMMS form that documents internal approvals for proposals prior to submission.

Sponsored Project: a formal award, such as a contract, grant, or cooperative agreement that is made to UMMS for a research, training, clinical study, public service, or other activity; or an internally funded project which is the result of a formal application and approval process. Industry sponsored clinical studies are included in the definition.

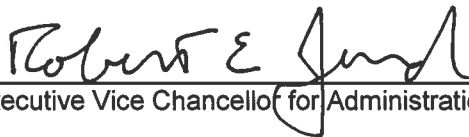
Approvals



Interim Chief Research Officer



Date



Executive Vice Chancellor for Administration & Finance



Date

Forms / Instructions

In support of this policy, the following forms are included:

Name	Number
Request for Exception from 95% Maximum Sponsored Effort Rule	N/A

Appendices

In support of this policy, the following appendices are included:

Name	Number
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