

Introduction to a UR Comprehensive Effort Reporting Policy

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Proposed Contents

- A. Total University Effort
- B. Proposing Effort and Requesting Salary Support
- C. Establishment of Salary Support
- D. Management of Effort Commitments
- E. Certification of Effort
- F. Cost Sharing of Effort
- G. Annual Plan Confirmation System Review



Proposed Contents

A. Total University Effort (TUE)

1. General Principles

- a. What's in
- b. What's out

2. Relationship of TUE and Salary Allocation



Proposed Contents

B. Proposing Effort and Requesting Salary Support

1. General Principles
2. Minimum Effort
3. Volunteering Effort
4. Training Grants
5. K Awards
6. Sponsor Limitations on Salary Levels
7. Budget Reductions
8. Visiting Faculty
9. Emeritus Faculty



Proposed Contents

Minimum Effort

Faculty are expected to propose some level of activity (1% or more) on proposals where they are listed as PI or key personnel, unless specifically exempted by the sponsor or the award type (e.g. equipment award).



Proposed Contents

Volunteering Effort

Institutional Base Salary must be distributed across a faculty member's TUE. It is not possible for a faculty member to have “unfunded” or “volunteer” activities.



Proposed Contents

Budget Reductions

The PI and other key personnel are expected to provide the level of effort outlined in the proposal, even when the amount funded is less than requested.



Proposed Contents

Budget Reductions (cont.)

The PI is responsible to determine whether (1) effort commitments will need to be reduced proportionately and request sponsor approval; (2) original commitments will be retained and other budgeted items foregone; or (3) neither effort commitments nor other budget categories can be reduced (thus cost sharing?).



Proposed Contents

C. Establishment of Salary Support

1. General Principles
2. Summer Effort
3. Vacation, Sick Time
4. Extra Compensation



Recommendations

Potential New Process

Annual Faculty PAF Update

- In early July, run a report of faculty with salary in excess of NIH salary cap and who have NIH funding.
- For the applicable faculty members, create a PAF to recalculate the subcode 1070 salary cap amounts.



Proposed Contents

D. Management of Effort Commitments

1. General Principles
2. Faculty with Greater than 90% Sponsored Project Effort
3. Proposal Writing
4. No Cost Extensions
5. Need for Sponsor Approval
6. Graduate Students



Proposed Contents

General Principles

There is a reasonable variance within which documented faculty effort should range (i.e. 5 percent and less than 25% of the committed effort) for a particular project.



Proposed Contents

Greater Than 90% Sponsored Project Effort

Maintain a system that manages potential over-commitments (e.g.: exceeding certain thresholds on active awards, or the combination of commitments on active awards and outstanding proposals)



Proposed Contents

Proposal Writing

- If the proposal writing relates to providing budget, technical and other materials on a continuing project (i.e. non-competing renewal) that time is part of the effort devoted to the project.
- All other proposal writing efforts for either new awards or competitive renewals of existing awards (including data gathering in research areas unrelated to existing projects) may not be charged to sponsored projects.



Proposed Contents

Proposal Writing (cont.)

- There is no federal guideline or directive regarding a “typical” percent of effort for proposal writing. This percent will vary among PIs.
- Proposal writing cannot be considered de minimis.



Proposed Contents

No Cost Extensions

- The PI and other key personnel are expected to continue contributing the original level of committed effort, or else request sponsor approval for an effort reduction.
- Continued effort might require institutional funds, which is cost sharing. Form 150 is to be completed, including appropriate approvals.



Proposed Contents

Graduate Students

- If the graduate student is receiving compensation for services performed on a grant, their effort needs to be certified.
- If the graduate student is receiving a stipend (i.e. not compensation for services), there is no effort requiring certification.



Proposed Contents

E. Certification of Effort

1. Who Can Certify
2. Summer Salary
3. Individuals Who Leave the University
4. Consequences of Not Certifying
5. Changes to Prior Certifications



Proposed Contents

Who Can Certify

Clarify the following –

- Each individual should certify their own effort, unless extenuating circumstances prevent this from being achieved.



Recommendations

Potential New Process

Individuals Who Leave the University

- If an individual leaves the UR, the administrator must process a “no change” Personnel Action Form (PAF) and have the individual certify the effort on the form. A “no change” PAF has the same effort allocation information as “current and proposed” but the effective date is the date of termination.
- If the individual leaves before certifying...the Chair or someone with sufficient knowledge of the work performed may sign.



Recommendations

Potential New Process

Annual “No Change” PAF for Selected Employees

- Run a report of employees without an effort/payroll allocation change in the prior 12 months.
- For the employees on the report with at least one sub-ledger 5 account in the allocation, prepare a “no change” PAF.
- Print and have employee sign the effort certification.



Proposed Contents

F. Cost Sharing Related to Effort

1. Certification of Cost Share Effort

G. Annual Plan Confirmation System Review

H. Examples



Recommendations

Potential Requirement for July 2013

- Prior to July 2013, update a comprehensive list of all faculty with cost share commitments.
- For the applicable faculty members, create a July 2013 PAF to incorporate the use of subcode 1071 for every sponsored project that the faculty member has a cost share effort commitment.



Recommendations

Training

- For faculty
- For administrators



Examples



Example 1 - Calculating Effort

Dr. A is budgeted to devote 75% of Total University Effort to an NIH project and is paid from the project at that rate.

Dr. A spends 30 hours per week (on average) on the project and 20 hours per week (on average) on teaching and administrative duties.

Dr. A's Actual Effort on the project is 60%
(i.e. 30 divided by 50).

Actual Effort is calculated and expressed as a percentage of Total University Effort, not an arbitrary 40 hours.



Example 2 - Effort on Awards and Clinical Trials

Dr. B has three NIH grants which cover 90% of salary.

Dr. B is also a Principal Investigator on eight clinical trials but does not charge any effort to them.

Dr. B currently serves as Chair of a department and such responsibility entails approximately 10% of effort in a typical week.

A department account covers 10% of his salary.

The effort allocated to the NIH grants is excessive since the time Dr. B. is spending on the eight clinical trials is not accounted for elsewhere.



Example 3 - External Consulting

Dr. C spends 34 hours in a typical work week, and 10 hours on a typical weekend, working on UR business.

Dr. C spends 11 hours, on average, working on an NIH project.

Dr. C spends 6 hours every Monday consulting for an outside entity.

The outside entity directly pays Dr. C for the consulting services.

Dr. C should have 25% effort (11 hours/44 hours) allocated to the NIH project.



Example 4 - Adjusting Effort Due To New Awards

Dr. D typically works 50 hours per week. 15 hours, on average, is spent on an NIH project and the other 35 hours are spent on other UR responsibilities.

Dr. D's effort allocation is 30% to the NIH project (15 hours/50 hours).

Dr. D obtains a second NIH project. In addition to the 15 hours on the original NIH project and 35 hours on other responsibilities, Dr. D now spends 10 hours on the new NIH project.

Dr. D's Actual Effort is now 25% on the original NIH project (15 hours/60 hours).



Example 5 - Vacation and Sick Leave

Dr. E, a 12-month faculty member, is absent for one month because of vacation and illness.

During the remainder of the year Dr. E spends 80% effort on NIH projects and Dr. E's salary/effort allocation is 80% to the NIH projects.

The 80% salary allocation to the NIH project is valid for the month that includes the vacation and illness.



Example 6 – Effort Without Salary Support (Cost Sharing)

Dr. F is involved in an NIH project with 3% committed effort. The 3% is being cost shared.

Assuming Dr. F expends 3% effort on the project, the 3% is charged to an unrestricted account using the 1071 subcode.

Using the 1071 subcode allows the cost sharing (i.e. the difference between the committed effort and the effort being allocated directly to the project) to be tracked for the calculation of the organized research base when the UR prepares its Indirect Cost Rate proposal.



Example 7 - NIH Salary Cap

Dr. G has an Institutional Base Salary of \$300,000 and expends 10% effort on an NIH project. The NIH salary cap is \$179,700.

Only \$17,970 (i.e. 10% of \$179,700) can be directly allocated to the NIH project account over 12 months.

The \$12,030 difference between the capped rate and the uncapped rate may not be charged to any sponsored project. Rather, it is allocated to an unrestricted account using a subcode of 1071.

Using the 1071 subcode allows the amount in excess of the capped salary to be tracked for calculation of the organized research base when the UR prepares its Indirect Cost Rate proposal.



Example 8 - K Awards

Dr. H works, on average, 60 hours per week at UR which includes 50 hours of research time and 10 hours performing clinical duties (i.e. patient care). The patient care is part of Dr. H's Total University Effort.

Dr. H's K award requires 75% commitment of professional effort to the award. To meet the 75% effort commitment, Dr. H must devote 45 hours (i.e. 75% of 60 hours) to the award.

Dr. H is in compliance with the terms of the K award since 83% effort (50 hours/60 hours) is devoted to the award, which exceeds the required 75% effort commitment.



Example 9 - Voluntary Committed Cost Sharing

Dr. I commits 40% effort to an NIH project and expends that amount of effort.

Dr. I's payroll allocation is 30% to the NIH project. The 10% not charged to the NIH project constitutes cost sharing and is charged to an unrestricted account using the 1071 subcode.

Using the 1071 subcode allows the cost sharing (i.e. the difference between Committed Effort and the amount directly charged to the project) to be tracked for calculation of the organized research base when the UR prepares its Indirect Cost Rate proposal.



Questions?

Comments?

Additional Considerations?

