

<b>Document Title:</b> Minimum Effort and Summer Effort on Main & Branch Campus Sponsored Projects	<b>Version:</b> 1	<b>Date of Last Review:</b> 03/01/2018
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### **MINIMUM EFFORT ON SPONSORED PROJECTS**

Effective January 5, 2001 through a Presidential Review Directive and clarification memo [Memoranda 01-06](#) issued by the Office of Management and Budget (OMB), it is expected that “*most Federally-funded research programs should have some level of committed faculty (or senior researchers) effort, paid or unpaid by the Federal government. This effort can be provided at any time within the fiscal year (summer months, academic year, or both).*” The clarification also states that, “...Some types of research programs...do not require committed faculty effort, paid or unpaid by the Federal government...”

In agreement with best practices being followed by similar high-activity research institutions, the University has determined **the minimum amount of effort committed to a specific sponsored research activity as a direct charge (or committed and tracked cost share\* may be no less than 1% of the Principal Investigator’s, Co-Investigator’s and Key Personnel’s University Effort.** Beyond this limit, the specific amount of effort committed to a particular sponsored activity is left to the judgment of the Principal Investigator, based on his or her estimate of the actual effort necessary to meet the technical goals and outcomes of the project. In most cases, it is expected that the effort will be substantially larger than 1%.

The following are excluded from the requirements set forth by the policy:

(This list is not exhaustive; should you have questions about a particular program or sponsored activity, please contact the Office of Sponsored Projects (OSP) for further guidance.)

- Equipment and Instrumentation grants for acquisition, unless the PI or key personnel will have effort devoted to installation, setup, etc.
- Doctoral dissertation grant or other awards intended as “student augmentation” such as Fellowship / Scholarship awards.
- Training grants (e.g., T32, Mentors on K/Career Awards).
- Specific purpose awards such as travel grants, workshops, and conference support grants.
- National Science Foundation (NSF) Research Experience for Undergraduates (REU) supplements. Note that committed effort for the PI must be present on the research grant for which the REU is a supplement.
- National Institutes of Health (NIH) Minority Supplements. Note that committed effort for the PI must be present on the research grant that receives the supplement.
- National Institutes of Health (NIH) Other Significant Contributors as cited in the agency’s SF424 Application Guide
- Faculty mentors on institutional training grants and large Center proposals with significant training components, including, but not limited to, NSF STC, MRSEC, EPSCoR, PIRE and PREM.

## **MAXIMUM ALLOWED SPONSORED PROJECT EFFORT**

Given that most faculty members have responsibilities for teaching, administration, or other University activities, it is typically not feasible for them to charge 100% of their salary or certify 100% of their effort to sponsored research. Administrative responsibilities include new proposal preparation, service as departmental chair/division head/director, and service on department/division/college committees. In general, faculty members will not be permitted to charge or certify 100% effort to sponsored research activities. Exceptions to this may include faculty who have no other teaching or administrative responsibilities (e.g., faculty who are assigned entirely to one long-term sponsored project) and will be reviewed on a case-by-case basis by the chair, dean/director and OVPR, as applicable.

## **SUMMER EFFORT/SALARY FOR FACULTY WITH 9-MONTH ACADEMIC APPOINTMENTS**

Federal grant rules do not allow 9-month Faculty to pay themselves more than 1/9<sup>th</sup> of their salary in any one-summer month. Faculty on 9-month appointments may pay themselves a maximum of 3/9ths of their academic year salary during the summer. Additional details regarding this can be found [here](#).

Please note: If research to be performed is for a National Science Foundation (NSF) award, the maximum compensation is limited to no more than two months of regular salary in any one year, including summer salary. This limit includes salary received from all NSF funded grants.

Faculty receiving summer salary from a sponsored project will typically perform such work in their normal place of business (i.e., the University) unless the project requires that the work be conducted off site. If a faculty member has academic, administrative or other non-research activities (such as vacation) during the summer period, he or she may be precluded from devoting 100% effort to sponsored projects and thus from requesting summer salary from those sponsored projects.

## **REDUCTION OF EFFORT COMMITMENTS**

During the life of the award, when required by sponsor policies, it is the PI's responsibility to obtain University and sponsor prior approval for absences (generally 3 months or more) or significant (25% or more) reductions of the PI's and/or Project Director's effort. If a reduction in effort commitment is made, the salary support coming from that award must be reduced commensurate with the effort.

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The following Frequently Asked Questions may assist in understanding this policy:

### **Q1. If there is summer effort, do we also need AY effort?**

A1. No. OMB Memorandum (M-01-06) states: "...*This effort can be provided at any time within the fiscal year (summer months, academic year, or both).*" But, as indicated above, the effort budgeted should be the best estimate for the actual effort required.

### **Q2. Can the minimum effort be provided as cost-share?**

A2. Yes, the effort may be provided as cost-share if it's not prohibited by the sponsor (e.g., NSF) and if pre-approved by the Vice President for Research, based upon recommendations of the department chair and dean/center director.

### **Q3. Will I need to certify the minimum effort in my effort certification?**

A3. Yes, this is committed effort (whether paid directly from the sponsored project or cost-shared) and needs to be tracked and certified in your effort certification.

**Q4. Does minimum effort apply to “Other Senior Personnel” besides the PI?**

A4. Yes, it applies to ‘key personnel’ who typically include research faculty, research scientists and project leaders, depending on their intellectual contribution to the proposed scope of activity. Typically, replacement of any of these individuals requires approval from the sponsor.

**Q5. Are there any special considerations I need to know for NSF?**

A5. Unless stated otherwise in the solicitation, cost sharing (match, in-kind, institutional commitment, etc.) is unallowable.

**Q6. Are there any special considerations I need to know for NIH?**

A6. The National Institutes of Health (NIH) Grants Policy Statement notes that “... *‘zero percent’ effort or ‘as needed effort’ is not an acceptable level of involvement for ‘key personnel.’*” Those that may contribute to the scientific development or execution of the project, but are not committing any specified measurable effort to the project, should be described as Other Significant Contributors (OSC) rather than as a co-investigator.

**Q7. Is minimum effort required on grants from non-Federal sources?**

A7. Yes, unless no-salary is mandated by the sponsor.

**Q8. I am on a 9-month contract; can I cost-share my unpaid summer effort to meet the minimum requirement?**

A8. No. This would result in unpaid effort which violates labor laws.

**Q9. May I make a request for an exception to the 1% effort rule?**

A9. Exception requests may be submitted for consideration by submitting the appropriate [request/justification form](#). These will be reviewed on a case-by-case basis and it should be noted that approval of exception requests will be rare.

\* The minimum effort should only be cost shared when agency permits and allows voluntary cost share.