

Policy 1316

Effort Commitment: Managing Effort Associated with Sponsored Projects

Responsible Office	Office of Grant and Contract Administration	Effective Date	12/01/06
Responsible Official	Director, GCA	Last Revision	07/08/09

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Scope

This policy sets forth requirements for proposing and managing effort on sponsored project awards administered by Yale University.

Purpose of the Policy

In requesting sponsored projects funding, the University must ensure that the proposed effort commitments are reasonable and conform to the University's expectations of the Principal Investigator (PI) and key personnel. If the proposed sponsored project is awarded, the University must assure the sponsor that the effort proposed will be effectively managed within the parameters of the sponsor's requirements and University policy.

As a recipient of sponsored awards, the University must assure sponsors that the effort expended on sponsored projects is at least commensurate with the salary charged to those projects. In addition, sponsors must be assured that uncompensated effort committed to a project is provided and that PIs and key personnel have properly accounted for effort devoted to research and other sponsored projects.

Policy Statement

- In preparing applications for sponsored projects funding, PIs are expected to provide reasonable estimates of the percent of effort necessary to carry out the proposed project.
- PIs must meet any proposed voluntary or mandatory commitments (i.e., uncompensated effort) of effort to sponsors.
- Key personnel such as PIs must obtain University and sponsor prior approval for reductions in effort when such approval is required by sponsors.

Policy Sections

1316.01 Proposing Effort and Requesting Salary Support

As stated in [Policy 1315.01: Effort Reporting: Certifying Effort on Sponsored Projects](#), sponsors generally consider estimates of effort in proposal budgets to be commitments if such proposals are subsequently awarded. The basis for estimating proposed effort is the same as after-the-fact

effort reporting – that is, the proposed or estimated effort must be expressed in relation to each individual's total University effort.

1316.02 Institutional Policy on Voluntary Cost Sharing of Effort

Yale University 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 sponsor-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 Dean for self-support units or the Provost for FAS units prior to the preparation of the budget and budget justification. The signature of the Department Chair on a proposal transmittal sheet for a proposal indicates that he or she also has approved any voluntary commitment to cost share effort.

1316.03 Minimum Proposed Effort

Faculty and other key personnel are expected to meet minimum mandatory effort requirements on sponsored projects. Acceptance of an award with specified minimum mandatory effort requirements such as certain program project awards, and center or career development awards carries with it responsibility for meeting those requirements.

Faculty are expected to propose some level of activity (1% or more) or the minimum required by the program on proposals on which they are listed as Principal Investigator or key personnel unless specifically exempted by the sponsor. (Examples of exceptions to the minimum 1% effort requirement would possibly include equipment and instrumentation grants, travel grants and conference awards.) If an award is accepted, the faculty member and key personnel are committed to providing this level of effort over the annual budget period of the award unless sponsor policies permit otherwise.

1316.04 Maximum Allowed Sponsored Project Effort

Most faculty generally have responsibilities for teaching, administration, or patient care that would preclude them from devoting 100% of their time to sponsored activities. Department chairs, faculty, and department research administrators should regularly review proposed sponsored activity to assure that, if other activities required of the faculty member reduce the available effort to devote to sponsored activities, adjustments are made consistent with sponsor terms and conditions. Salary support for teaching, Yale administration, service, clinical activity, new or competing proposal preparation and institutional governance must come from University funds unless they are specifically approved activities of a sponsored project. It may also be appropriate for certain research faculty and staff to be charged at 100% effort to a sponsored project in cases where such responsibilities do not exist.

1316.05 Summer Effort/Salary for Faculty with 9-Month Academic Appointments

Faculty compensated for 9-month academic appointments are permitted to expend up to an additional three months of summer effort on one or more sponsored projects in the period beyond the academic year (i.e., during the summer research period) and earn up to three months of additional salary for that effort, subject to sponsor and University policies and the approval of the department chair and dean/provost.

A request for summer salary indicates a commitment to put forth the comparable effort on the particular project during the summer, not the academic year. Effort expended during the academic year does not satisfy a commitment related to the receipt of summer salary. Faculty receiving summer salary from a sponsored project will typically perform such work in their normal place of business unless the work being conducted is off site and a requirement of the project.

If a faculty member has academic, administrative or other non-research responsibilities during the summer period, they may be precluded from devoting 100% effort to sponsored projects and thus from requesting 3 months of salary from those sponsored projects.

Faculty who receive summer salary from sponsored projects will be required to certify whether the effort was expended on those projects **during the summer effort period**.

1316.06 Reduction of Effort Commitments

During the life of the award, when required by sponsor policies, it is the PI's responsibility to obtain University (chair and GCA) and sponsor prior approval for absences, generally 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 must be reduced commensurate with the reduction in effort.

1316.07 Establishment of Salaries on Sponsored Projects Accounts

Salary distribution consistent with the committed effort should begin on sponsored projects (or cost sharing) accounts concurrently with actual project effort. It is the PI's responsibility to be aware of his/her effort commitments and to communicate any inability to meet those commitments to his/her respective business office to ensure that any necessary sponsor approvals of their reduced effort are obtained.

Whenever a significant change in effort is anticipated, faculty, department administrators, and department chairs should review activity, including clinical service, to assure there is sufficient time available to meet all obligations.

Yale University's effort reporting process relies on payroll data to provide information on the projects to which an individual's salary was charged during the certification period. Although the semi-annual and summer effort reporting periods may not coincide with the annual budget periods for which effort commitments are normally made, the effort reporting process offers an opportunity to consider whether the actual effort expended during the reporting period is consistent with the effort commitment.

1316.08 Sponsor Imposed Salary Caps

Certain sponsors impose a limit or "cap" on the annual rate of salary reimbursement for a given amount of effort. The difference between the reimbursed salary ("capped amount") and the un-reimbursed salary is considered committed cost sharing (Refer to [Policy 1306: Cost Sharing on Sponsored Projects](#)). The PI and other key personnel must still devote the amount of effort agreed upon (within the constraints of 1316.06) irrespective of a sponsor imposed salary cap.

Related Information

[Policy 1315](#): Effort Reporting: Certifying Effort on Sponsored Projects

[Policy 1311](#): Institutional Base Salary for Sponsored Projects

[1315 PR.04](#): Effort Reporting Using the Effort Reporting System (ERS)

[Policy 1306](#): Cost Sharing on Sponsored Projects

[OMB Circular A-21](#)

Contacts

Subject	Contact	Phone
Committing effort to a sponsored projects	Office of Grant and Contract Administration	Central Campus: 432-2460 Medical School: 785-4689

Roles and Responsibilities

Department Head/Chair

- Approve mandatory and voluntary cost sharing.
- Review proposed sponsored activity to assure that other activities required of the faculty member will not conflict with the proposed effort commitment.

Principal Investigator/Faculty

- Provide reasonable estimates of effort in order to carry out the aims of the proposals and fulfill other University obligations.
- Meet commitments to sponsor regarding voluntary and mandatory cost sharing.
- Comply with sponsor requirements regarding reduction in effort.
- Provide a minimum of 1% or more in all proposals (unless sponsor policies permit otherwise).
- 9 month faculty must receive the prior approval of the chair and dean/provost in order to earn up to three full summer months of salary on sponsored projects for effort expended on those awards during the summer.

Business Office Personnel

- Ensure that sponsor imposed salary caps are calculated correctly and salaries are recorded properly in a cost sharing account.
- Assist PI with the preparation of requests to sponsors regarding the reduction of effort.
- Provide PIs with salary distribution and effort commitment information to facilitate charging instructions for sponsored projects.

Office of Grant and Contract Administration (Central campus and Medical School)

- Ensure that proposals submitted to sponsors are reviewed in accordance with the requirements of this policy and the sponsor.
- Review awards to ensure that appropriate cost sharing accounts are created for both mandatory and voluntary committed cost sharing.
- Review and approve University requests for reductions of effort as required by sponsor terms and conditions.

Revision History

Revised 09/26/08. Minor revision on 5/22/07. New policy was posted on the main site on 11/22/06. Draft posted on 10/20/06.

The official version of this information will only be maintained in an on-line web format. Any and all printed copies of this material are dated as of the print date. Please make certain to review the material on-line prior to placing reliance on a dated printed version.