

# **Research Administration Policy**

## Policy 20.4: PI Minimum Effort on Sponsored Projects

Effective Date:	January 1, 2021
Last Updated:	May 6, 2024
Responsible:	Office of Research Services
Contact:	Director, Office of Research Services

### **Reason for Policy**

This policy describes the minimum effort required for Principal Investigators (PIs) on sponsored projects.

Effective January 5, 2001 through a Presidential Review Directive and clarification memo M-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 memo also states that, "...Some types of research programs...do not require committed faculty effort, paid or unpaid by the Federal government..."

As a recipient of federal funding UNC Charlotte is required to comply with the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance", 2 CFR §200), as well as other federal requirements for sponsored awards.

### **Policy Statement**

All PIs must include some level of budgeted committed effort on most sponsored projects, unless such effort is unallowable per the sponsor's guidelines.

The minimum amount of effort committed to a specific sponsored project may be no less than one percent (1%) of the PI's university effort. The requirement applies to all University employees who are sponsor-recognized PIs (including Co-PIs) on the project.

Beyond this minimum, the specific amount of effort committed by PIs to a particular sponsored activity should be commensurate with the actual effort necessary to meet the technical goals and outcomes of the project.

Some types of sponsored programs do not require committed effort by PIs. The following are some common examples:

- Equipment and Instrumentation grants
- Mentor effort on doctoral dissertation, fellowship, scholarship awards, and training grants
- Limited purpose awards such as travel grants, outreach programs, and workshop/conference grants
- Supplements to existing awards

However, this list is not exhaustive. If you have questions about whether a particular program or sponsored activity is subject to this policy, please consult with the Office of Research Services or the Center for Research Excellence.

### Procedures

During the proposal development process, PIs should coordinate with the appropriate pre-award staff to develop budgets that include the appropriate levels of committed effort, in compliance with this and any associated University policies.

PIs must quantify their effort commitments (e.g., person-months, dollar amount of salary, etc.) in the proposal and must clearly identify whether that effort would be paid for by the sponsor, or would be cost-shared (if the latter, see <u>University Policy 602.6, Cost Sharing in Sponsored Programs</u>). The PI's effort commitments may consist of summer months, academic year, or a combination of the two.

Sponsors generally consider estimates of effort in project proposals to be formal commitments once the proposals are awarded. University faculty and staff are expected to charge their time to sponsored awards in accordance with their committed effort levels and within the designated budget periods. Any proposed changes to the levels or timing of committed effort must be reviewed and approved via standard University and sponsor processes and guidelines for such changes.

### **Exclusions/Exceptions**

A few common exceptions are included in the policy statement above, but that list is not all-inclusive. For confirmation of whether a particular program or sponsored activity is subject to this policy, please consult with the Office of Research Services or the Center for Research Excellence.

In rare instances, exceptions may be requested. To apply for an exception a waiver request outlining the rationale, and including any associated documentation, must be submitted to the Vice Chancellor for Research for review at least 10 business days before the proposal submission deadline. If an exception is granted, documentation of that approval will be included in the proposal record when it is routed through the University's electronic research administration system.

### **Failure to Comply**

Proposals that fail to comply with this policy will not be fully approved in the University's electronic research administration system, and therefore will not be submitted to the sponsor.

### **Related Information**

2 CFR 200 (Uniform Guidance)

University Policy 602.6, Cost Sharing in Sponsored Programs