

Minimum Effort on Sponsored Projects

From 2006 to 2010, the Office of Inspector General at the National Science Foundation conducted 16 audits of effort reporting systems at major research universities. The most common problems found in these audits are

- Failure to adequately account for unfunded effort and voluntary uncommitted cost sharing
- Policies and procedures do not reflect grants management regulations and requirements
- Effort committed in grant proposal not charged to the grant

These audit findings are typically based on a January 5, 2001 Presidential Review Directive and clarification memo to Circular A-21 issued by the Office of Management and Budget (OMB), which states that "... most Federally-funded research programs should have some level of committed faculty (or senior researchers) effort, paid or unpaid by the Federal government." In addition, 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.'"

These audit findings plus OMB and NIH guidance make it important to establish and implement a minimum effort requirement. Therefore, effective immediately, the University of Massachusetts Amherst requires a minimum of 1% effort either directly charged or provided as pre-approved cost share on most grants.

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

Q1. What is the minimum level of effort that may be used for a grant application to the federal government?

A1. *The minimum amount of effort committed to a specific federally sponsored research activity may be no less than 1% of the employee's 'University effort.' Beyond this minimum, the amount of effort committed to a sponsored project is left to the Principal Investigator, based on a best estimate of the actual effort required to meet the goals and outcomes of the proposed project. In most cases, it is expected that the effort will be substantially larger than 1%.*

Q2. If there is summer effort, do we also need AY effort?

A2. *No. OMB Memorandum (M-01-06) states: "... 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)." But, as noted in A1, the effort budgeted should be the best estimate for the actual effort required.*

Q3. Can the minimum effort be provided as cost-share?

A3. *Yes the effort may be provided as cost-shared effort if pre-approved by the Provost, based on recommendations of the department head/chair and dean. Exceptions noted below.*

- Q4. Will I need to certify the minimum effort in ECRT?
A4. *Yes, this is committed effort (whether paid or cost-shared) and needs to be tracked and certified in ECRT.*
- Q5. Does minimum effort apply to “Other Senior Personnel” besides the PI?
A5. *Yes, it applies to ‘key personnel’ who typically include research scientists, principal scientists and senior scientists, depending on their intellectual contribution to the proposed scope of activity. Typically, replacement of any of these individuals requires approval from the sponsor.*
- Q6. Which grants are exceptions to this requirement of Minimum Effort?
A6. *The following are excluded from the requirements set forth in this policy: (N. B.: This listing is not exhaustive; should you have questions about a particular program or sponsored activity, please contact your School/Departmental Research Administrator or the Office of Grants and Contracts for further guidance.)*
- Equipment and Instrumentation grants for acquisition, unless the PI or key personnel will have effort devoted to installation, setup, etc.
 - Doctoral dissertations 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.
- Q7. Is minimum effort required on grants from non-Federal sources?
A7. *Not unless mandated by the sponsor but, as noted above, the effort budgeted should be the best estimate for the actual effort required.*
- Q8. What if the sponsor does not permit faculty salary in the grant?
A8. *If the published sponsor guidelines exclude faculty salary on the grant, the effort will be automatically cost-shared, i.e., the approvals in Q3 are not required.*
- Q9. What if I have already budgeted the maximum salary permitted by the sponsor during the grant period? For instance, I have two months of salary from NSF salary in each of the next two years. I have no other funding and I am submitting another NSF proposal that would take place during that period.

A9. In this case, assuming that the NSF limit of 2/9 AY salary applies as it does In most cases, the effort should be included in the budget but will be automatically cost-shared as in A8. Note that this automatic approval does not apply to grants from other agencies during this period. For instance, a grant to DOE or NIH should include summer and/or academic year effort as required for the proposed project.

Q10. Many NSF programs do not want to include cost-sharing in the budget unless it is mandatory for that particular program and identified in the guidelines. What should I do about this in my proposal?

A10. You should show the committed effort but should not list the dollar amount on line M. The Internal Processing Form will capture the cost share for tracking purposes.

Q11. I am on a 9 month contract; can I cost-share my unpaid summer effort to meet the minimum requirement?

A11. No, because this would result in unpaid effort which violates labor laws.

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