

OFFICE OF COMPLIANCE SERVICES
UVM.EDU/POLICIES

POLICY

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e.g. budget period. Commitments are made in the award proposal and may be documented by the sponsor in award documents e.g. Notice of Award. Changes to reduce committed effort may require sponsor approval.

Departmental Administration: Administrative and support services that benefit common or joint

- x The University shall employ the After-the-fact Payroll Distribution method for *non-exempt hourly employees* whose effort is certified during the submission of their bi-weekly record of hours.

Institutional Base Salary for Sponsored Agreements

The Institutional Base Salary (IBS) of an individual shall be used for estimating, accumulating, and reporting salary charges to sponsored agreements and to ensure compliance with the OMB Uniform Guidance, the National Institutes of Health (NIH) Grants Policy Statement, and other applicable federal laws and regulation that permit salary and wage charges to be made to sponsored agreements.

IBS Definition: IBS is the base annual salary set by the University (through an academic unit or administrative unit) for an employee's regular appointment, whether that employee's professional effort for the University is spent on research, teaching, outreach, administration, patient care, or other activities, and whether that employee is appointed full-time or part-time. The following is intended to help clarify, for principal investigators and others, the meaning of IBS:

- (a) IBS for faculty includes payment for the assumption of [on-going](#) administrative duties, howsoever paid, such as those of a department chair, associate dean, or director.
- (b) Medical School faculty practice salary is included in IBS if the salary is set at the beginning of the University of Vermont Medical Center fiscal year and will be paid to the faculty member through the University of Vermont Medical Center fiscal year. If any part, or all, of faculty practice plan salary is not guaranteed through the University of Vermont Medical Center fiscal year, it is not included in the IBS.
- (c) Salary that is incentive practice income under faculty practice plans is never included in IBS.
- (d) Except as noted in subsection (a) above, IBS excludes fringe benefits, reimbursed expenses, temporary additional salary for work outside of one's regular appointment, such as supplemental compensation for overload or Continuing and Distance Education (CDE), and other University compensated activities not included in an employee's performance review or evaluation.
- (e) Income earned through non-University employment and consulting for third parties is not included in the IBS.

Note that the definition of Institutional Base Salary (IBS) may not be the same as salary definitions used elsewhere in University policies and procedures, including the definition of base salary used in collective bargaining agreements.

Consistent Usage of IBSThe duties included in the IBS shall be the basis from which an employee proposes effort in a sponsored agreement, apportions salary charges to a sponsored agreement, and reviews/certifies effort on a sponsored agreement.

(d)

Principles of Committing Effort on Sponsored Agreements

At time of proposal development and submission all known positions devoting time or effort to the sponsored project should be included in the proposal at reasonable and sufficient levels needed to carry out proposed project and meet any sponsor specific regulations.

Required Effort Contributions from Principal Investigators The University of Vermont requires Principal Investigators to include some level of effort in all proposals being submitted that reflects the size and scope of the project, supports programmatic execution, award management and compliance oversight. Such proposed effort must take into account any sponsor required minimum level of effort and must average no less than 1% per budget period.

Effort on Clinical Trials Unless required by the sponsor, PI committed effort on clinical trial proposals is implied, but is not required. Effort associated with the identification, screening and enrolling of subjects as well as oversight responsibilities (start-up activities, training, regulatory activities, close out activities) should be considered when determining the proposed/actual PI effort. Other effort related considerations:

- x Clinical trials without committed effort must be taken into account in determining effort availability to commit to other sponsored projects and meeting effort commitment disclosures to sponsors. Actual measurable effort by a PI on a clinical trial must be allocated to the Clinical trial sponsored project
- x PI effort on clinical trials is not required for those budget periods where there is no activity on the study and procedures on patients have not been performed
- x NIH funded clinical trials must follow NIH guidelines to ensure any minimal effort requirements are met or amended through prior approvals

Exceptions to the PI Minimum Effort: University's minimum requirement of 1% PI effort does not apply to the type of awards listed below. These types of sponsored agreement may be proposed and awarded (set up) without PI effort:

- x Equipment and instrumentation grants
- x Doctoral dissertation grants
- x Student augmentation grants
- x Individual fellowships
- x Travel awards which provide funding to defray cost of attending academic or professional conferences
- x Conference awards that only support institution conference costs
- x Individual training grants or institutional training grants

Any additional exceptions must be approved in advance by Financial & Costing Accounting Services.

Other Personnel Effort: In sponsored agreement proposals, the PI shall propose effort which is consistent with the description of the individual's role on the project. For instance, the effort for [*other significant contributors*](#) shall be listed "as needed" and not be considered as committed effort on NIH-sponsored agreements.

Maximum Allowed Effort on Sponsored Agreements: Employees with University responsibilities outside of sponsored agreements shall be precluded from committing and charging 100% of their time to sponsored agreements.

Voluntary Cost Share of Effort: The University discourages **voluntary cost share** (both committed and uncommitted cost share) and expects the sponsors to bear the full cost of the sponsored agreement.

- x Committed Cost Share of Effort – When approved, the effort associated with committed cost share will be included in the proposal and shall be considered part of the commitment of time on a sponsored project.
- x Uncommitted Cost Share of Effort – Effort which is over and above the committed effort on a sponsored project is not considered part of the commitment of time on a sponsored project and does not have to be included in the proposal.

Sponsor-Imposed Salary Cap and Effort The effort associated with any salary above a sponsor-imposed salary cap shall be considered effort and be considered a part of the employee's 100% effort.

Committed Effort during a No-Cost Extension Time Period The PI shall comply with the requirements for committed effort as stated in the terms and conditions of the sponsored agreement during the no-cost extension time period. Specific funding agency guidelines should be consulted for additional guidance on sponsors' expectations with respect to changes in effort.

Institutional Training Grants: An effort commitment is expected for the named research training program director, since they will be expending effort in coordinating the training program. Faculty mentors effort on institutional training gra.9 (T)-0.8 -(-)-006-0.6 (g)-1.9 (r)5.7 (a)-1.1 62r (ti7te)1 (nsr2Td(:)Tj0.263657(i)-1.5 N6 (g)-1.9)-00.-0.6 (t

Effort associated with Sponsored Proposals

Effort associated with preparing, submitting and supporting sponsored proposals is considered a [department administration](#) activity and

Responsibilities

Principal Investigators shall ensure that applicable prior approvals of effort reduction are obtained in a timely manner. PIs shall monitor the reasonableness of salary and wage charges of personnel on their respective sponsored agreement(s) in relation to work performed.

Reviewers/Certifiers

- x [OMB Uniform Guidance: Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

Training/Education

Training/education related to this policy is as follows:

Training Topic:	Effort Management and Reporting Training		
Training Audience:	All UVM PIs, Faculty, Staff or Students who expend effort either <u>directly</u> or <u>as cost share</u> on a sponsored agreement	Delivered By:	Financial & Cost Accounting Services
Method of Delivery:	Contact Financial & Cost Accounting Services	Frequency:	

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