

Guidance on Treatment of Effort Commitments at UW-Madison

Updated: May 9, 2016

Updated Process

Effective immediately, UW-Madison will track effort commitments only for those individuals identified as PI, Co-PI, and Key Personnel in the award document. If the award document does not specifically identify PI, Co-PI, or Key Personnel, effort commitment will be tracked for the PI. This will apply to new awards and new modifications going forward. This practice does not diminish the scientific contribution to the project of other senior/key personnel; it merely limits the number of individuals that are affected by the effort-related prior approval requirement to those specifically named in the NoA.

Discussion

UW-Madison requires effort reporting as a means of providing assurance to our sponsors that a) salaries charged to sponsored projects are reasonable in relation to the work performed and b) faculty and staff have met their commitments to sponsored projects.

Since the inception of an updated effort policy implemented in 2007, UW-Madison has provided guidance to faculty and staff indicating that effort commitments requiring tracking are found in the proposal and award, for individuals identified as PI, Co-PI, and Key Personnel. Thus, effort commitments have previously been tracked for all individuals listed in either the proposal or award document as PI, Co-PI, and Key Personnel.

The release of the Uniform Guidance (2 CFR 200) in December 2013, and the subsequent issuance of agency-specific terms and conditions compliant with 2 CFR 200, provided an opportunity for UW-Madison to review its effort policies and procedures. Research & Sponsored Programs (RSP) has carefully assessed the Uniform Guidance and agencies' terms and conditions and determined that adjusting our institutional process for tracking effort commitments is appropriate.

In 2 CFR §200.308, prior approval requirements for reductions in time devoted to the project apply to the approved project director or principal investigator (PD/PI). Prior approval is needed for the PD/PI for a disengagement of more than three consecutive months or a 25 percent or greater reduction in time spent on the project. (Permanent replacement of an approved project director or principal investigator is considered to be an issue separate from a disengagement for more than three months. Disengagement may imply that the PD/PI will return to his/her role.) To know whether or not a reduction has occurred, UW-Madison must track the level of effort committed on the part of the project director/principal investigator.

Analysis of Federal guidance on the use of multiple principal investigators, published in the Federal Register by the Office of Science and Technology Policy (OSTP) in September 2007 (<https://www.gpo.gov/fdsys/pkg/FR-2007-09-24/pdf/07-4638.pdf>) is also instructive on effort commitment tracking. This notice indicates that multiple principal investigators "share the authority and responsibility for leading and directing the research" and that "compliance requirements will continue to apply to individuals and institutions...regardless of the designation of multiple PIs." The document also affirms that "all PIs will be named in the official award" that is issued by the Federal agency.

In addition to requirements specific to PI(s), the National Institutes of Health imposes requirements related to senior/key personnel named in the Notice of Award (NoA). NIH requires prior approval for a reduction of 25 percent or more in the level of effort for senior/key personnel named in the NoA.

Through directives in the Uniform Guidance and in the OSTP Federal Register Notice, Federal agencies emphasize the importance of tracking time devoted by the project director/principal investigator and, in the case of NIH, senior/key personnel. This emphasis is reflected by clearly designating the individuals (PIs and senior/key personnel) for whom prior approval is required by naming them in the Notice of Award. Based on these directives and guidance, UW-Madison will track effort commitments for those individuals listed in the award document.

Please address questions to effort@rsp.wisc.edu.