UF Commitment Entry Guidelines

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**Commitment Entry Guidelines**

**Definition:** A commitment is reflective of the promise of time/effort made to the sponsor. This time can be designated over the life of the award, a project period, or to specific terms. Most Federally-funded research programs should have some level of committed effort, paid or unpaid. This effort can be provided at any time within the fiscal year (summer months, academic year, or both).

The University collects commitments through UFIRST at a person level as it was specified to the sponsor. Each person provides their commitment over the appropriate sponsor defined budget, project or award period. The commitment data is translated to job level by Cost Analysis and entered into myUFL. If there needs to be term by term adjustments, reductions within allowable sponsor tolerances, or other adjustments that are allowable but not reflective of what was communicated to the sponsor, those are made ONLY in myUFL and UFIRST maintains the commitment from the sponsor’s perspective.

**General Entry**

- All projects should have a commitment entered, an entry indicating that no commitments are necessary or an acceptable project type in UFIRST that falls under the University Effort Procedures & Directives.
- Life of Award is equal to the life of the award NOT the project. Allowing this to default on awards where each year's funding is segregated out can re-open previously closed certified periods. A new error is in place to prevent this unless the error is overridden.
- For 9-Month Employees, assume full summer FTE; this can be adjusted later. For example, a one-month commitment would be entered as 33% assuming the individual will be appointed full-time for the full summer.
- Academic term commitments should be entered on the FA09 appointment and summer appointments should be entered on the FASU.
- Multiple Years - If the same project number will be used for all award years (no carry forward restrictions), the commitments for the entire award period can be entered at the initial stage.
- Commitment lines – Generally one commitment line per person per budget period should be entered. For example, the National Institutes of Health (NIH) funds each budget period separately. To account for this requirement one line will be entered for each budget period even if the commitment is the same expected amount each year.

**UFIRST General Guidance**

- For awards converted into UFIRST, it is not necessary to enter all historical information. Only the current budget period and forward should be entered. The sole exception is no cost extensions where the final budget period and extension period should both be entered.

**myUFL General Guidance**

- If an employee has committed over 90% to sponsored projects myUFL will generate an error message. The error can be overwritten at Core office level. Any time a commitment is
entered that generates this error, Cost Analysis will complete entry of the commitment and notify the Director of C&G and the C&G contact for the project.

- If a new commitment entry causes a 90% error on a closed effort term, it can be overwritten with the message "prior period already certified with 90% or more effort". Closed term is considered any effort term that has been released for certification.

- A change to a commitment for a certified term will cause an error in the myUFL system. If an adjustment to an effort commitment is required for an effort term that has already been certified, this must be done at the Core Office level. Changes to previously certified terms will require a recertification of the effort record.

**Personnel**

- Individuals - Commitments to be entered for:
  - Principal Investigators
  - Co-PI and Co-Investigator's with quantified commitments
  - Any other individual identified in the award as key personnel with quantified commitments
  - Individuals used to meet cost sharing.

- 0 FTE Personnel - If the individual committed is retired or under a non-pay appointment (ex. Courtesy); a commitment cannot be entered and effort cannot be tracked in the system. If no other individuals meet the requirements for a commitment for this project no commitment will be entered.

**Minimum Effort**

- Although PIs might reference a specific period of effort (summer months), they cannot be absent from the project for all other periods. Per UF guidelines, a 1% of cost share commitment will be entered for the other terms.

- A summer commitment does not need to be entered in the event that (1) there is no expectation of effort during the summer, (2) there is no budget for summer and (3) there is no summer appointment for the PI.

- In cases where award commitment for the PI is not quantified, a minimum of 1% should be entered. No such entry is required for other key personnel. See: [https://obamawhitehouse.archives.gov/omb/memoranda_m01-06/](https://obamawhitehouse.archives.gov/omb/memoranda_m01-06) [https://www.whitehouse.gov/omb/memoranda_m01-06](https://www.whitehouse.gov/omb/memoranda_m01-06)

- Some programs have standard minimum commitments such as NIH K awards. Most NIH K awards have a minimum 75% commitment. However, levels of effort and salary reimbursement limitations vary among types of K awards and within NIH divisions. Consult the K award kiosk and matrix to determine the correct commitment and salary reimbursement levels for your award. K Kiosk: [http://grants.nih.gov/training/careerdevelopmentawards.htm](http://grants.nih.gov/training/careerdevelopmentawards.htm)
Exceeding Tolerance Levels

- If a full time faculty is committed over 90% on sponsored projects, a review of other University activities must be performed to determine that the faculty member can meet the sponsored requirement and other duties as assigned by the department.
  - Cost Analysis will enter the commitment and notify Contracts and Grants who will in turn contact the department to discuss appropriate shifting of commitments on other projects, reductions on other projects (seeking agency approval when necessary), or adjustments to other assignments.
- If the individual is a K award recipient, no approval is needed as long as there is no teaching.
- If total commitments exceed 100%, the pending commitment cannot be entered.
  Cost Analysis will notify Contracts and Grants who will work with the department and committed individual to review the commitments during the effort term to determine how to resolve, including notifying agencies of a reduction of effort if necessary.

Adjustments to Effort

- Prior approval is required for any reduction of effort of 25 percent or more from the level that was approved at the time of the initial competing year award for the PI and Key personnel.
- Federal Awards: If the Principal Investigator (PI) and/or Key Person effort on an award is reduced by more than 25% of the effort committed in the funded proposal, federal regulations require that prior approval be obtained from the federal sponsor (2 CFR 200 – 200.308 c.1.iii). Any request for such a reduction should be submitted as a Personnel modification through UFIRST.
  - For NIH: Prior approval is only required for a change in effort for the Program Director (PD)/PI or other senior/key personnel specifically named in the NoA. Other personnel, if not named in the NoA, do not need prior approval but their changes should be reported to NIH in the next progress report (RPPR). No corresponding change should be made in UFIRST until the RPPR is submitted with the changes appropriately identified in the “changes to key personnel” question.
- Nonfederal/Industry: Sponsors also anticipate that the PI and/or the Co-PI will spend the time and effort on the funded project that was committed in the funded proposal. The terms and conditions of the nonfederal award will govern whether changes in PI/Co-PI or other personnel effort will need to be reported or if sponsor approval will be required for a reduction in effort. Any required prior approvals for such a reduction should be submitted as a Personnel modification through UFIRST.
- When term commitments need to be reduced, the entire budget period including academic and summer terms need to be considered for tolerance. Normally, a budget period consists of three terms (Fall, Spring, Summer) all terms will be taken into account to ensure that the commitment is within tolerance. The overall will not be adjusted in these cases but a note will be added to the override such as “Commitment within tolerance considering Academic Year (AY) and Summer (SU) terms for budget period.”
Special Award Types

No Commitments

- The following project types are exempted from required commitments under UF policy. If no personnel used for cost sharing and no explicit PI commitments, the de minimus 1-2% does not have to be entered:
  - Equipment Grants
  - Membership only grants (see Memberships section)
  - Multiple sponsors
  - IFAS Faculty Service Program projects
  - Student Stipends or Fellowships if they are for student augmentation
  - “Participant Support Cost” grants
  - Industry Sponsored clinical trials including any award that will reside in University fund 214
  - UF Foundation funding (excluding those where there is a non-UFF Prime Sponsor listed)
  - Mentors on Institutional Training grants
  - PI on IPA (Intergovernmental Personnel Act Assignment) award if the PI is not the recipient of the IPA award. If the PI is the recipient, commitments will be entered as normal. Commitments will be entered for the IPA recipient.
  - Internal Subs or projects (unless the PI is listed in the main award as Senior or Key Personnel). The commitment is to the award. The University data is collected at the project level. Just because someone is a project manager does not infer a commitment to the award.
  - Patient or Clinical Care (unless a quantified commitment is specified in the award)
  - Per sample contracts where the number of samples is not known at the time of agreement and the contract is paid based on number of samples that are run
  - Pilot Projects on existing awards (unless effort is a condition of the funding)

Memberships

- If paid externally, the PI’s commitment will be reviewed case by case.
- Internal grants for membership fees have no commitment
- NSF membership - project for membership should not have commitments.

Internal Awards

- The following internal awards are expected to have commitments:
  - Office of Research Opportunity Funds
  - CTSI pilot awards
**Fixed Price Awards**

If an award is reimbursed at a total set upon price rather than reimbursed based on actual costs:

- The price of Government (federal, state and local) and Non-Profit organization awards are negotiated based on expectation of services. Any determination of price should be considered a commitment by the University. Even if no detailed cost breakouts are included, the effort for the PI and Co-I’s that comprised the price determination will be entered into UFIRST and myUFL.

- Industry: The price is determined based on acceptable market value and if NO explicit statement of commitment is made in the contract, budget or budget justification agreed to by the sponsor, only the de minimis amount of effort (1%) required by UF Effort Procedures and Directives is required for the PI.


**Advance Release Awards (Temps)**

- Commitments at the time of the temp are optional. There is no legal obligation to enter effort as the University does not have the award. If the department wishes to log anticipated commitments, commitments can be entered.

**No Cost Extensions (NCE)**

- Unless otherwise stated on the award, the original commitments of the PI and all key personnel are expected during the no cost extension period. Note that for all federal agencies where the original budget was broken out by budget period, even if multiple budget periods are awarded at a time (i.e., NSF application for three years funded in full), then the commitment should be assumed by individual budget period not the full award period.
  - If the commitment was proposed in months: Months are a finite amount. No additional months are expected during the extension period. Simply the time to meet the commitment is extended.
    - In UFIRST, DSP & C&G will ensure that months committed in the last budget period are entered with the dates being: start date of the last budget period through end date of the NCE.
    - Cost analysis will review the entry.
      - If the original months commitment has been met, a 1% cost share will be entered
• If the original months commitment has not been met, the commitment will be extended into the myUFL system diluted to include the last funded budget period and the NCE period.

  o If the commitment was proposed in percentage: The commitment will continue at the proposed percentage level unless a reduction is approved by the sponsor.
    • In UFIRST, the committed percent is multiplied by the total months of the last commitment period and the extension period and the new total months is entered. For example, if the original last commitment period was 10% over 2 years (4/1/2015-3/31/2017 and an original entry of 2.4 months), and the NCE is through 3/31/2018, UFIRST modification should now reflect 4/1/2015-3/31/2018 and 3.6 months of effort.

  o If there is a new quantified commitment during the No Cost Extension, a new row should be entered into UFIRST for the NCE time period. The original committed budget period would not be extended as it would be in the examples above.

• NIH No Cost Extension: Unless stated in the award that this is prohibited, no prior approval is required to reduce effort for Senior/Key Personnel during the NCE. This includes the personnel named in the Notice of Award (NOA).
  o NIH Guidelines 8.1.1.3
    [https://grants.nih.gov/grants/policy/nihgps/html5/section_8/8.1_changes_in_project_and_budget.htm](https://grants.nih.gov/grants/policy/nihgps/html5/section_8/8.1_changes_in_project_and_budget.htm) Extension of Final Budget Period of a Previously Approved Project Period without Additional NIH Funds: With the exception of grant programs that have an effort requirement, or where terms and conditions prohibit such reductions, NIH will not require prior approval for the reduction in effort for Senior/Key personnel. The recipient is reminded that active awards must have a measurable level of effort.
  o Although prior approval is waived, this simply puts the requirement on UF to manage the information. UF will require that declaration of reduction is submitted as part of the internal NCE request through UFIRST and then passed to Cost Analysis through the normal reporting communication channels.

Reduction/Removal of Effort Used to Meet Cost Share

• This change does not need to be communicated to the sponsor unless the individual is Senior/Key personnel or the request is intended to reduce the overall required cost share commitment
• In UFIRST the department should process a mod to reduce or remove this individual’s effort
• C&G will work with the department to identify how the required cost share will now be met
• Cost Analysis will reduce/remove the effort commitment in the commitment module

Roles and Responsibilities

Principal Investigators
• Meet effort requirements as agreed upon with the sponsoring agency.
• Notify DSP or C&G if there is a change in the effort expected for an award that is greater than 25% or if there is a leave of absence greater than three months and work with those offices to obtain sponsor approval when necessary.
• Participate actively in fiscal management including providing timely information to departmental personnel to facilitate payroll distribution changes and reviewing charges throughout the life of the project to ensure accuracy

Departmental Support Staff
• Enter Commitments into the UFIRST system.
• Provide guidance and assistance to faculty to support understanding of commitment requirements.
• Follow up and process any necessary adjustments to commitments including:
  o Terminated Faculty
  o Reductions or increases in overall commitment required
  o Removing and replacing cost sharing required employees
• Manage and process changes to effort commitments over the reporting terms.

Division of Sponsored Programs (DSP)/Contracts & Grants (C&G)
• DSP and C&G are responsible for managing the award. Any approvals to be made would be routed to them and would be their responsibility.
• C&G still has the ability to enter and adjust commitments and can continue to perform those functions where it makes sense; C&G works directly with the departments and can easily make the adjustment if necessary.
• Committed Over 100% - Contracts and Grants will work with the department to resolve.
• Full Time Faculty committed over 90% - C&G will be notified by Cost Analysis and work with the department to resolve any issues that may arise with other University responsibilities.

Cost Analysis
• Review and enter all commitments into the myUFL system.
• Work directly with the department for technical items such as deciding what appointment to enter the effort under or how to disperse a single period commitment over effort terms.
• Work directly with the department to collect information for a NIH reduction in effort for those individuals not named on the NoA.
• No Cost Extensions Where Effort is Proposed in Months: Cost Analysis will review the certifications to determine if the commitment has been met during the last budget period.
• If it has, a 1% cost share will be entered.
  • If it has not been met, it will be diluted to include the NCE period.
• No Cost Extensions Where Effort is Proposed as a Percentage: Cost Analysis will enter the commitment percentage through the extension period.
• Notify C&G of any full time faculty that exceed 90% committed.
• Confirm the correct employee job appointments are identified before entry.
• Provide DSP and C&G with a monthly report of terminated employees with effort commitments