

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, a budget 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 his or her 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 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 are needed, those are made ONLY in myUFL while UFIRST maintains the commitment from the sponsor's perspective.

General Entry

- Commitments are at the AWARD level, not the project level. Not every project under an award requires a commitment, even if the project's type is not exempted. If no key personnel's effort is tied to that project, then no commitment is to be entered. All awards should have at least one commitment or a clear indication in the UFIRST award smartform why none was entered.
- If the award (or submitted proposal) includes a quantified commitment for key personnel in both calendar months **and** a percent of effort, to guarantee sponsor requirements are met UF will track and manage the larger of the two.
- 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. If the sponsor does not require breaking the award into budget periods and the commitment effort remains constant throughout, one commitment for the life of the award may be entered.
- For Cost Analysis entry into myUFL:
 - For 9-Month Employees, assume full summer FTE – 3 months denominator. For example, a one-month commitment would be entered as 33%.
 - Academic term commitments should be entered on the FA09 appointment and summer appointments should be entered on the FASU.

UFIRST General Guidance

- For awards set up in myUFL prior to the inception of UFIRST (July 1, 2016) and then 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

- A change to a commitment for a certified term will trigger an error in the myUFL system. If an adjustment to an effort commitment is required for an effort term that has already been certified, a complete review of the project and the commitment must be performed by DSP, C&G & Cost Analysis. Changes to previously certified terms will require a recertification of the effort record.

Personnel

- Individuals - Commitments to be entered for award level:
 - Principal Investigators
 - Co-PIs or Co-Investigators with quantified commitments
 - Any other individual identified in the award (or if silent then in the proposal) as key personnel with quantified commitments
 - Individuals used to meet voluntary committed or mandatory cost sharing requirements
- Zero FTE Personnel – No individual with a 0 FTE should be proposed with a quantified commitment. If a faculty member has made a commitment but is retired or under a non-pay appointment (i.e. 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. If the budget includes a specific commitment, Cost Analysis will notify DSP to ensure appropriate resolution with the sponsor.
 - If the PI is an Emeritus Faculty they can remain the Award PI and/or Project Manager but must have a Courtesy (CTSY) appointment and cannot have a quantified commitment.

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% voluntary committed cost share commitment will be entered for the other terms.
 - Exception to the above:
 - If the faculty has a nine-month appointment, a summer commitment does not need to be entered if (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 the overall award commitment for the PI is not quantified, a minimum of 1% voluntary committed effort must be entered in UFIRST and also in myUFL. No such entry is required for other key personnel. See:
https://obamawhitehouse.archives.gov/omb/memoranda_m01-06/
- Some programs have standard minimum commitments such as NIH Career (K) or R35 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 award, including the original solicitation, for confirmation of the appropriate minimum commitment. This documentation should be attached in the UFIRST Award Attachments.

Exceeding Tolerance Levels

- If a full-time faculty member is committed over 90% on sponsored projects, a review of his or her 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 review the situation and determine what if any action needs to be taken.
 - If the individual exceeding 90% is an NIH K award recipient and the faculty has no courses other than dissertation or mentoring courses, no communication to C&G is necessary as long as there is no teaching.
- If a faculty member's commitments exceed 100%, the pending commitment cannot be entered in myUFL. It should be entered into UFIRST to track the actual sponsor commitment.
 - Cost Analysis will notify C&G & DSP, who will work with the department and committed individual to review the commitments made during the effort term to determine how to resolve.

Adjustments to Effort

- myUFL is configured to require Cost Analysis approval for any reduction of effort of 25 percent or more from the level that was approved at the time of the initial competing award for the PI and key personnel. Many awards differ in the tolerance levels; therefore this is NOT intended to be the sole control. Departments are expected to understand unique awards where the tolerance is less than 25%.

- **Federal Awards:** If the Principal Investigator (PI) and/or Key Person effort on an award is reduced by 25% or more of the effort committed in the funded proposal, prior approval must be obtained from the sponsor (2 CFR 200.308 c.1.iii). Any request for such a reduction should be submitted as a Personnel modification through UFIRST.
 - For awards under the federal-wide research terms and conditions (see: <https://www.nsf.gov/awards/managing/rtc.jsp>), 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. UF will track the effort for all personnel named in the proposal as key, even if not specifically named in the NOA. This simply means prior approval is waived for this subset of personnel; there is still requirement on UF to manage the information. UF will require that declaration of reduction is submitted as part of a UFIRST Personnel modification (even if sponsor prior approval is not required) and then passed to Cost Analysis through the normal communication channels.
- **Nonfederal/Industry:** Sponsors also anticipate that the PI and/or the Co-PI will spend the time and effort on the project that was committed in the 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 request for changes in effort to nonfederal sponsored awards should be submitted as a Personnel modification through UFIRST. DSP will review the award conditions and determine what approvals or notifications are necessary. After determining that the modification will move forward, DSP & C&G will complete the modification in UFIRST and Cost Analysis will be informed through the normal communication channels.
- When commitments for a single term need to be reduced but the commitment over the entire budget period remains under the 25% tolerance, the change can be made solely in myUFL. Cost Analysis will take all terms into account when considering term-reduction impacts on the overall budget period. The overall commitment 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

- *If there is no explicit commitment*, the de minimus 1% does not have to be entered on the following types of projects (note that if there is an explicit commitment, it will STILL be entered):
 - Equipment Grants
 - Multiple sponsors
 - IFAS Faculty Service Program projects
 - UF Foundation funding where there is no non-UFF Prime Sponsor listed
 - Student Augmentation Awards – Programs that are primarily for the benefit of the student. If the student leaves the lab or University, the funds do not remain with the UF faculty for general furtherance of their program. This includes doctoral dissertation programs and undergraduate and graduate fellowships.
 - 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.
 - Pilot Projects on existing awards (unless effort is a condition of the funding)
 - Non-federally sponsored clinical trials (generally managed in fund 214)- note Federal clinical trials without a quantifiable commitment will have the 1% de minimus entered and tracked.
 - 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
 - Unrestricted donations where there is no explicit statement of work

Internal Awards

- Internal Awards are generally not managed in UFIRST and in myUFL for funds 201, 209 and 214. Due to the institutional nature and the cost sharing requirements, the following internal awards are managed in UFIRST and 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:

Government and non-profit sponsors: The prices 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 and no quantifiable commitment was made to the sponsor, the effort for the PI and Co-I's that comprised the price determination will be entered into UFIRST and

myUFL based on calendar months, as this aligns with the UFIRST proposal budget workspace. If the agreement contains a commitment, effort will be tracked according to the submitted budget or the budget incorporated into the agreement.

- 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. If commitments are explicit in the contract, budget or budget justification approved by the industry sponsor, it will be included in UFIRST and myUFL.

Advance Release Awards (Temps)

- Commitments at the time of a temp are optional. There is no legal obligation to enter effort commitments as the University does not have an award to which it can be held accountable. If the department wishes to log anticipated commitments, commitments can be entered. When processing the UFIRST modification finalizing the temp, any commitments entered will be scrutinized confirming they remain accurate.

No Cost Extensions (NCE)

- Unless otherwise stated in the award conditions or modifications, the original commitments of the PI and all key personnel are expected during the no-cost extension period. For federal agencies where the original budget was broken out by budget period, even if multiple budget periods are awarded at one time (i.e. NSF application for three years funded in full), the commitment should be assumed by individual budget period, not the full award period.
 - If the commitment was proposed in months (weeks, days or hours): Time periods are finite amounts. No additional time is added during the extension period; simply the overall project period under which to meet the commitment is increased.
 - In UFIRST, DSP will ensure that time committed in the last budget period is 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 in myUFL
 - 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.

- If the commitment was proposed as a percentage: The commitment will continue at the proposed percentage level unless a reduction is approved by the sponsor.
 - In UFIRST, a new row will be added for the NCE period to reflect the percentage expectation over just the extension period.
- If there is a change to the quantified commitment during the No Cost Extension, a new row should be entered into UFIRST for the NCE time period.
- **NIH No Cost Extension:** Unless explicitly prohibited in the award, no prior approval is required to reduce effort for Senior/Key Personnel (including those named in the Notice of Award (NOA)) during the NCE.
 - NIH Guidelines 8.1.1.3
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 measureable level of effort.
 - 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 communication channels.
- **K Award No Cost Extension:** The commitment of the K awardees is expected to remain at 75% during a no cost extension. If there is at any point during the K award a reduction in effort or change in FTE, work with the Division of Sponsored Programs to perform a more detailed review and provide guidance.

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