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UCD Directives

UC DAVIS: VICE CHANCELLOR - RESEARCH
UC DAVIS: VICE CHANCELLOR - ADMINISTRATION

April 10, 2006

DEANS, DIRECTORS, DEPARTMENT CHAIRS, AND ADMINISTRATIVE OFFICERS

UC DAVIS FACULTY

Re: Minimum Level of Effort Commitment on Externally Sponsored Projects

Accurate reporting of effort on externally sponsored projects has been identified by the federal government as an area with a low level of compliance among U.S. institutions and a very high risk for universities. For this reason, the Offices of Inspector General for federal agencies have been carrying out audits and reviews that have resulted in large fines and repayment to sponsors by universities.

We have a responsibility to be compliant with federal regulations, including the requirement that a commitment of effort is required on all externally funded projects and must be disclosed in the proposal documents. The effort is recorded as a percent of time. The level of effort proposed for a project should reflect the percent of time and effort required to meet the goals of the project. When a project is awarded, the proposed commitment of effort must be honored during the performance period of the project, and the percent of time must be reasonable in relation to the other total institutional activities for which an individual is compensated by the University.

If an awarded amount has been reduced by the sponsor, it is reasonable to negotiate a reduced level of effort from what was originally proposed. In these situations, the Office of Research, Sponsored Programs, will assist in necessary negotiations with the sponsor.

In order to ensure that UC Davis is in compliance with the federal requirement, the following has been instituted:

* A commitment of effort must be indicated on all externally sponsored projects except for specific types of awards that do not require an effort component on the project (i.e., equipment or construction grants).

* For projects with a total award less than \$25,000, a minimum of 1% is required. For projects more than \$25,000, a minimum of 2% is required. These are minimum effort commitment levels and a higher percentage may be required by the sponsor. For example, NIH generally requires that the Principal Investigator commit a minimum of 5% on any NIH project.

* If salary related to the effort commitment is not requested in the budget, an effort commitment still exists. In this situation, the effort commitment is being funded by the University and as such is considered a cost sharing commitment.

* If salary related to the effort commitment was initially requested in the budget and subsequently rebudgeted to cover other project expenditures, the effort commitment to the sponsor remains. The effort is then considered to be cost shared by the University.

* A proposal will not be submitted to the sponsor until a percent of

effort has been identified for all Principal, Co-investigators and Key Personnel.

If the effort commitments are being cost shared by the campus, those commitments must be documented by entering the appropriate information in the Cost Share Tracking System (CSTS). This documents which account(s) is funding the cost share commitments.

Your cooperation is appreciated to help ensure UC Davis meets sponsor expectations for effort commitment.

Contacts for questions:

Sponsored Programs Director Ahmad Hakim-Elahi, Office of Research

(530) 752-6060 ahakimelahi@ucdavis.edu

Associate Vice Chancellor Lynne Chronister, Office of Research

(530) 752-4566 luchronister@ucdavis.edu

Extramural Accounting Manager Kathy Hass, Office of Administration

(530) 757-8525 kxhass@ucdavis.edu

Associate Vice Chancellor Mike Allred, Office of Administration

(530) 754-9396 jmallred@ucdavis.edu

Barry Klein, Vice Chancellor - Research
Office of Research

Stan Nosek, Vice Chancellor - Administration
Office of Administration

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