

UF Commitment Entry Guidelines

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Commitment Entry Guidelines

Definition: A commitment is the promise of effort made to the sponsor. This effort 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 from the Principal Investigator, paid or unpaid.

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 and term level by Cost Analysis and entered into myUFL. If term-by-term adjustments, reductions within allowable sponsor tolerances, or other internal to UF 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

1. 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.
2. 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.
3. 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 each year.
4. For Cost Analysis entry into myUFL:
 - a. For 9-Month Employees, assume full summer FTE – 3 months denominator. For example, a one-month commitment would be entered as 33%.
 - b. Academic term commitments should be entered on the FA09 appointment and summer appointments should be entered on the FASU.

myUFL General Guidance

1. In cases where a new commitment must be added to a certified effort term or a commitment must be changed in a certified effort term, an error will trigger in myUFL that will prevent the effort report from being reopened or recertified without core office intervention.
2. DSP and C&G will review to determine if effort is available for recertification via departmental funded effort.

- a. If departmental funded effort is not available, DSP and C&G Leadership will be engaged to determine if the proposed change is appropriate.
 - b. If necessary, sponsor approval will be obtained before the change is approved internally.
3. After the review above occurs, Cost Analysis will override any errors and reopen a closed term for recertification.

For Whom Effort Should be Entered

1. All individuals with the following roles on the award:
 - a. Principal Investigator (PI);
 - b. Co-Principal Investigator(Co-PI) or Co-Investigator (Co-I) with quantified commitments;
 - c. Any other individual identified in the award (or if silent then in the proposal) named as key personnel with quantified commitments; and
 - d. Individuals whose salary is used to meet voluntary committed or mandatory cost sharing requirements
2. 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 UF systems. If the budget includes a specific commitment for an individual with a 0 FTE, Cost Analysis will notify DSP to ensure appropriate resolution with the sponsor.
3. In certain situations, Emeritus Faculty can engage as the Award PI and/or Project Manager but must have a Courtesy (CTSY) appointment, cannot have a quantified commitment, and must have PI eligibility approved by the Unit and DSP.

Minimum Effort

1. 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 in myUFL. No such entry is required for other key personnel. See:
https://obamawhitehouse.archives.gov/omb/memoranda_m01-06/
2. Although PIs might reference a specific period of effort (summer months), they cannot be absent from the project for all other periods. In myUFL, a 1% voluntary committed cost share commitment will be entered for the other academic terms.
 - a. 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.
3. Some programs such as National Institutes of Health (NIH), Juvenile Diabetes Research Foundation (JDRF) and American Heart Association Career Awards and NIH Maximizing Investigators' Research Award (MIRA or R35) have minimum commitments. DSP must reflect all commitments including programmatic commitments by reviewing the award, including the

original solicitation. Both the award document and solicitation should be attached in the UFIRST Award attachments.

- a. If the award explicitly allows for other projects to be executed using the protected commitment time (e.g. NIH K award in the last two years, IPA with Independent Research and Development (IR/D) program, Faculty Fellowship where UF sponsored projects are part of the expected work of the fellowship), then commitments will be entered in UFIRST on each award. Adjustments for overlap will be updated only in myUFL.
- b. R35's generally require a minimum of 51% of total **research** effort. During award setup and release of each incremental year, DSP will engage the PI and/or PUAC to confirm that the 51% threshold will be met as entered in UFIRST and make updates as necessary.

Exceeding Tolerance Levels

1. If a full-time faculty member is committed over 90% to sponsored projects in any term, 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.
 - a. Cost Analysis will enter the commitment and notify Contracts and Grants to review the situation and determine what if any action needs to be taken.
 - b. 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.
2. If a faculty member's commitments exceed 100% in any term, the pending commitment cannot be entered in myUFL. It will be in UFIRST to track the actual sponsor commitment.
 - a. Cost Analysis will notify C&G & DSP, who will review the commitments made during the effort term to determine how to resolve.

Adjustments to Effort

1. myUFL is configured to require Cost Analysis approval for any reduction of effort of 25 percent or more. Many awards differ in the tolerance levels; therefore myUFL is NOT intended to be the sole control. Departments are expected to identify awards where the tolerance is less than 25% and to request such reductions in UFIRST.
2. **Federal Grants:** In general, to reduce the effort of anyone who is tracked in UFIRST and myUFL by 25% or more, 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. Please note, this is general guidance. It is important to understand the terms and conditions for your project as the tolerance level may differ based on sponsor guidelines.

- a. 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 Notice of Award (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 seeking prior approval **from the sponsor** 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.
3. **All other Awards:** Sponsors expect that the PI and other named Key Personnel will spend the effort on the project that was committed in the proposal. The terms and conditions of the nonfederal award govern whether changes in effort need to be reported or if sponsor approval is required. Any request for changes in effort to 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. If no sponsor notification is required and if it is a less than 25% reduction, DSP can withdraw the modification. If the sponsor must be notified, approve, or if it is a greater than 25% reduction, DSP & C&G will complete the modification in UFIRST and Cost Analysis will be informed through the normal communication channels.
4. When commitments for a single term need to be reduced but the change to the commitment over the entire budget period remains under the 25% tolerance, the change can be made solely in myUFL. **Reminder:** this is a system-wide tolerance and should not be presumed as the only control for whether the sponsor allows this reduction without approval. In these cases, the overall commitment will not be adjusted in UFIRST, 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

1. *If there is no explicit commitment in the proposal or award*, the de minimis 1% for the PI 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):
 - a. Equipment or Instrumentation Grants
 - b. Multiple sponsor awards
 - c. IFAS Faculty Service Programs
 - d. 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, graduate and postdoctoral fellowships.

For these fellowships, the fellow is not considered the PI for the purpose of commitment entry, although they may be listed as such on proposal forms. Faculty fellowships are not student augmentation.

- e. Mentors on Institutional Training grants
- f. PI on IPA (Intergovernmental Personnel Act) if the PI is not the assignee. Commitments should always be entered for the IPA assignee.
- g. Pilot Projects on existing awards (unless effort is a condition of the UF sponsor's funding)
- h. Per event/capitation contracts where the number of events is not known at the time of agreement and the contract is paid based on number of events (includes enrolling only clinical trials)

Fixed Price Awards

1. If an award is reimbursed at a total set upon price rather than reimbursed based on actual costs:
 - a. Government and non-profit sponsors: 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 other named Key Personnel that comprised the price determination will be entered into UFIRST and myUFL. If a quantifiable commitment was submitted to the sponsor, effort will be tracked according to this commitment.
 - b. 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 entered for the PI. If commitments are explicit in the contract, budget or budget justification approved by the industry sponsor, those commitments will be included in UFIRST and myUFL. Caution should be taken to confirm that any commitment or documentation of hours for a key person is a minimum obligation (commitment) or maximum hours to be covered (not a commitment).

Advance Release Awards (Temps)

1. Commitments at the time of a temp are optional (but strongly recommended). There is no 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 will be entered as made in the proposal. When processing the UFIRST modification finalizing the temp, commitments will be reviewed to see if adjustment is needed.

No Cost Extensions (NCE)

1. The commitments of the PI and all key personnel from the last budget period are expected during the no-cost extension period. Unless stated in the award terms and conditions OR unless approved by the sponsor as part of the NCE request, commitments will be tracked as indicated below. If a new commitment is made or if a reduction is requested and approved, UFIRST will be updated according to the new commitment.
 - a. 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 budget period under which to meet the commitment is increased.
 - i. 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.
 - ii. In myUFL, Cost Analysis will review the entry.
 1. If the original months' commitment has been met, a 1% cost share will be entered for all effort terms in the no cost extension period.
 2. If the original 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.
 - b. 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.
 - i. In UFIRST, a new row will be added for the NCE period to reflect the percentage expectation over just the extension period.
 - ii. The myUFL commitment will be entered at the same percentage level for all effort terms in the no cost period.
 - c. 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.
2. **NIH No Cost Extension:** Unless explicitly prohibited in the award (such as K Awards where the level of effort is expected to remain at 75%), no prior approval is required to reduce effort for Senior/Key Personnel (including those named in the NoA) during the NCE.
 - a. 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.
 - b. Although prior approval is waived, this simply puts the requirement on UF to manage the commitment. UF will require that declaration of reduction is submitted as part of the internal NCE request before approving the commitment in the NCE Award Modification in UFIRST.

Reduction/Removal of Effort when the individual is not named Key but Used to Meet Cost Share

1. This change does not need to be communicated to the sponsor.
2. A UFIRST Award Modification must be processed to reduce or remove this individual's effort. Consideration should be made to ensuring the unit can meet the cost sharing obligation. The unit is responsible for the cost sharing plan.