

Minimum Effort on Sponsored Projects

Approved: 30Apr26

Administering Unit: Graduate School and Research

I. Purpose

The purpose of this policy is to provide guidance regarding the minimum effort required for investigators on sponsored projects.

Effective January 5, 2001, through a Presidential Review Directive and clarification memo M-01-06 issued by the Office of Management and Budget (OMB), it is expected that "most Federally-funded research programs should have some level of committed faculty (or senior researchers) effort, paid or unpaid by the Federal government. This effort can be provided at any time within the fiscal year (summer months, academic year, or both)." The clarification memo also states that, "...Some types of research programs...do not require committed faculty effort, paid or unpaid by the Federal government..."

Because the federal government is a primary sponsor of research and other scholarly activities at Western Carolina University, the federal cost policies contained in 2 CFR Part 200 *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)* are extended to all sponsored projects, regardless of sponsor type. Adherence to these measures will minimize non-compliance issues and audit disallowances that may impede or detrimentally affect the University research community.

II. Definitions

Principal Investigator (PI): The individual with overall responsibility for the conduct of research or other activity described in a proposal, protocol, or an award, and/or the individual with fiduciary responsibility for award management.

Key Personnel: Individuals who provide critical leadership positions within the proposal (and consequently their intellectual guidance) or who provide unique expertise to the proposed scope of activity. Key personnel typically include principal investigators, research scientists, principal scientists, and senior scientists, depending on their intellectual contribution to the proposed scope of activity. Typically, replacement of any of these individuals requires approval from the sponsor. Importantly, the status of key personnel does not necessarily imply salary support from the sponsor.

III. Effort on Sponsored Projects

Principal investigators and key personnel must include some level of budgeted committed effort on sponsored projects, unless such effort is unallowable per the sponsor's guidelines.

The minimum amount of effort committed to a specific sponsored project may be no less than one percent (1%) of the key personnel's university effort. Beyond this minimum, the specific amount of effort committed by key personnel to a particular sponsored activity should be commensurate with the actual effort necessary to meet the technical goals and outcomes of the project.

Some types of sponsored programs do not require committed effort by key personnel. The following are some common examples:

- Equipment and instrumentation grants
- Mentor effort on dissertation, disquisitions, theses; fellowship; scholarship awards; and training grants
- Limited purpose awards such as travel grants, outreach programs, and workshop/conference grants
- Supplements to existing awards

However, this list is not exhaustive. In these types of programs, sponsor guidance and programmatic norms may support zero committed effort for PIs or mentors, and WCU does not require committed effort where prohibited by the sponsor.

If you have questions about whether a particular program or sponsored activity is subject to this policy, please consult with the Office of Research Administration (ORA).

IV. Proposal Development

During the proposal development process, PIs should coordinate with the appropriate pre-award staff to develop budgets that include the appropriate levels of committed effort, in compliance with this and any associated University policies.

PIs must quantify effort commitments of key personnel (e.g., person-months, dollar amount of salary) in the proposal and must clearly identify whether that effort would be paid for by the sponsor or would be cost shared. The key personnel's effort commitments may consist of summer months, academic year, or a combination of the two.

Sponsors generally consider estimates of effort in project proposals to be formal commitments once the proposals are awarded. University faculty and staff are expected to charge their time to sponsored awards in accordance with their committed effort levels and within the designated budget periods. Any proposed changes to the levels or timing of committed effort must be reviewed and approved via standard University and sponsor processes and guidelines for such changes.