

## **UW-Milwaukee Policy on Effort, Commitments, and Effort Certification**

### **Background**

As a research institution, University of Wisconsin-Milwaukee recognizes the importance of providing good stewardship in managing extramural funds. The University's stewardship responsibilities include complying with federal requirements to certify faculty and staff effort on sponsored projects.

Support for the faculty's research goals is critical to the success of the University. The purpose of this document is to foster excellence in research by promoting the successful management of effort and commitments throughout the sponsored project life cycle. Activities during which effort issues are important include:

- Establishing faculty and staff appointments and professional duties
- Proposing effort in an application for a sponsored project
- Establishing effort commitments at the time an award is made
- Charging salary, documenting cost sharing, and expending effort during the life of a project
- Monitoring progress toward the fulfillment of effort commitments to specific projects
- Managing an individual's total commitments across all projects
- Certifying that salary charges are reasonable in relation to the work performed, and that commitments to sponsors have been met

### **Policy Statement**

It is the policy of University of Wisconsin-Milwaukee that:

1. All researchers who engage in sponsored projects will comply with University policies and sponsoring agency regulations regarding the proposing, charging, and reporting of their effort on those projects.
2. Effort must be certified for all individuals who:
  - a. receive salary support from a sponsored project, or
  - b. expend committed effort on a sponsored project without receiving salary support from the sponsor.
3. Faculty and academic staff certify their effort every six months.
4. Principal investigators certify their effort, and that of the graduate students and postdoctoral trainees who work on their projects, every six months.
5. Every three months, principal investigators certify the effort for non-PI classified staff who work on their projects.
6. Every PI must devote at least a one percent commitment to that project, with a few exceptions. Faculty cannot commit 100% of their effort on sponsored projects, as time must be reserved for other UWM duties. For academic staff, there is no limit on the amount of effort that can be devoted to sponsored projects. However, allocations of effort to sponsored projects must be reasonable given the individual's non-sponsored University activities.
7. All principal investigators, faculty, and academic staff who are involved in proposing, executing, directing, or managing sponsored projects are responsible for:
  - a. understanding the fundamentals of effort and commitment management and effort certification
  - b. proposing, expending, and managing effort in accordance with all applicable sponsor policies and university procedures. Changes in effort of PIs and other project personnel are permitted, and must adhere to procedures outlined in UWM's *Guidelines for Effort Reporting: Proposing, Managing, and Certifying Effort Associated with Sponsored Projects*.
  - c. completing the required educational programs associated with effort reporting
8. Effort must be certified in a timely manner.

## **Reason for Policy**

This policy was created in order to:

- Comply with provisions of the federal Office of Management and Budget's Circular A-21 (Cost Principles for Educational Institutions) regarding effort certification and other relevant sponsor requirements.
- Provide clear direction to faculty and staff for determining effort when preparing proposals and subsequently verifying effort.
- Promote the best possible alignment between faculty and staff activity and funding sources and, in so doing, enhance work at UW-Milwaukee.
- Establish expectations for tracking and confirming the certification of effort by University personnel.

*Complete information about the University's procedures for effort management and reporting can be found in the document titled **Guidelines for Effort Reporting: Proposing, Managing, and Certifying Effort Associated with Sponsored Projects**.*