

PROCEDURE FOR MODIFYING SPONSOR PROJECTS (KEY/NON-PERSONNEL AND EFFORT)

I General Overview

As a recipient of sponsored awards, the University must assure the sponsors that the award is managed according to the sponsor requirements. Every individual paid from a sponsored project and/or devoting effort to a sponsored project after award, inclusive of cost sharing, must comply with the sponsored project parameters.

Scope

This procedure sets forth requirements for managing effort on sponsored project awards administered by UTSW. It applies to Principal Investigators (PIs), department administrators and Grants Specialists to comply with sponsor guidelines and the University policies.

Purpose of the Procedure

In requesting sponsored projects funding, the University must ensure that the proposed effort commitments are reasonable and conform to the University's expectation of the Principal Investigators (PI), key personnel and all other personnel listed on the budget justification. If the proposed sponsored project is awarded, the University and the PI must assure the sponsor that the effort proposed, the personnel listed on the Budget Justification will effectively work to meet the aim of the project, and that the award is managed within the parameters of the sponsor's and University requirements, if applicable.

Please note, sponsors generally consider estimates of effort in proposal budgets to be commitments if such proposals are subsequently awarded. The basis for estimating proposed effort is the same as after –the-fact effort reporting – that is, the proposed or estimated effort must be expressed in relation to each individual's total University activities.

Faculty and other key/non-key personnel (PI deemed after the award) are expected to meet proposed effort requirements on sponsored projects. If an award is accepted, the faculty member and key personnel are committed to providing this level of effort over the annual budget period of the award unless sponsor policies permit otherwise. Acceptance of an award with specified minimum effort requirements such as certain program project awards, and center or career development awards carries with it responsibility for meeting those requirements.

Definition of Key Personnel and non-key can be found by clicking the hyperlink provided below.

http://www.utsouthwestern.edu/vgn/images/portal/cit_56417/51/16/416286Key_Personnel_PMA.pdf

II. Procedure to reduce effort for Key and Non-Key Personnel – Basic Process

Reduction of Effort Commitments

During the life of the award, it is the PI's responsibility by working with the Grants Specialist to obtain sponsor prior approval for absences (generally 3 months or more) or significant (25% or more) reductions of the PI's and/or other key personnel effort.

The OGM 10 form is an internal form, which is required for all effort and key personnel changes. Sponsor approval is required for all effort reduction of 25% or greater on federally sponsored projects and Non-federal sponsored program (depending on the sponsor guidelines) for key personnel.

Requesting and Modifying a Effort/Commitments for PI and Key/Non-Key Personnel

Key Personnel

a. Task 1

As soon as PI or his/her administrator is aware that there is a change in effort for personnel, s/he must contact Office of Grants Management Grants Specialist for proper procedure to comply with the sponsor guidelines in reference to change affecting the sponsored project

b. Task 2

OGM Grants Specialist will review and recommend any modification to the proposed letter to the sponsor, if required. The sponsor letter must be signed by the PI and Co-signed by Associate Dean of Research Administration.

c. Task 3

The OGM 10 Form is required for all effort and personnel changes to federal and non-federal sponsored projects. The sponsor approval must be attached for effort reduction of 25% or greater for Key Personnel or change and replacement of Key Personnel. Please note, OGM 10 form must include sponsor approval and it should not state that a request for approval will be submitted. The sponsor approval must be separate and it is not an automatic assumption that when the continuation/or non-competing renewal was approved by the sponsor that they accepted our request unless the progress report (ESNAP) included the change in the sponsor's form.

Identify Key Members of a project and its tasks

Key Personnel are proposed in a grant or other project application that is accepted by a sponsor, regardless of whether salary support is requested for the effort. Assign other key members to a project after award as deemed by the PI (for instances, a project administrators or an internal contact) if it is appropriate to the project's needs.

Requesting and Modifying Key Personnel

- 1) Changes in key personnel must be communicated to the Office of Grants Management. If the department or principal investigator is informed of termination of personnel associated with

his/her grant and that the individual is replaced, this should be communicated to OGM as appropriate so that the Grants Specialist can ensure the University complies with the sponsor requirements for changes in key personnel. This is to ensure that the PI and the institution notify the sponsor for approval and replacement of key personnel in a timely manner.

- 2) Key personnel must obtain sponsor prior approval for reductions in effort when such approval is required by sponsor or the key personnel deemed it necessary due to other research or institutional commitments
- 3) Please refer to the Task listed under Key Personnel – effort reduction procedure to implement the changes.

Non-Key Personnel

After awards, the PI frequently identifies non-key faculty members to a project, when the PI requires their assistance for a specific task within the project. These individuals were not included in the original proposal. An effort change to non-key faculty members does not require sponsor approval, however, these changes must be processed through an OGM 10 Form in a timely manner.

III. Related Information

- UTSW Activity Confirmation Policy
- UTS 163
- NIH Policy
- OMB Circular A-21

a. Contacts

- Grants Specialist at the Office of Grants Management
- Research Administration, Associate Dean of Research Administration, Dr. Perrie Adams
- Research Administration Compliance Analyst
- Office of Post Awards

b. Roles and Responsibilities to implement this procedure

Department Head/Chair

- Review proposed sponsored activity to assure that other activities required of the faculty member will not conflict with the proposed effort commitment (OGM-1)

Principal Investigator/Faculty

The PI is the individual, designated by the grantee, responsible for the scientific or technical aspects of the grant and for day-to-day management of the project or program. The PI is a member of the grantee team responsible for ensuring compliance with the financial and administrative aspects of the award.

- Provide reasonable estimates of effort in order to carry out the aims of the proposals and fulfill other University obligations
- Meet commitments to sponsor after award
- Comply with sponsor requirements regarding reduction in effort/removal of key personnel
- Ensures compliance with other Federal and organizational requirements

Office of Grants Management

The Grant Specialist is responsible for the processing of the application, the award, and the post-award administration of the sponsored project (Prior approval actions, such as effort and personnel changes, budget review, and no cost extension) and for interpretation of Grants Administration policies and provisions. The PI and Grants Specialists must work together in overall project administration. Prior approval requests (signed by an Authorized Organizational Representative - Associate Dean of Research Administration, Dr. Perrie Adams) should be submitted in writing to the Grants Management Specialist. Requests may be made via e-mail.

- Ensure the proposals submitted to sponsors are reviewed in accordance with the requirements of sponsor and the institution
- Review awards to ensure that appropriate personnel budgeted are aligned with the proposal submitted (sponsor application)
- Review and provide guidelines to the PI for requests for reductions of effort and removal of Key Personnel as required by the sponsor terms and conditions
- Review and verify the correctness of any changes made to the request
- Assist PI with the preparation of requests to sponsors regarding the reduction of effort

Grants Database Coordinator

Records all faculty commitments listed on sponsor application or progress report in GrantTrak. When award is received, the Coordinator updates the database with faculty effort levels from budget pages provided by the department. If an effort level change requires additional documentation or approvals, the Coordinator notifies the grant specialist who then follows up with the department to provide the required backup. Without an OGM10 and proper documents,

changes to key or non-key personnel and their effort will not be modified in GrantTrak.

The control process for monitoring key personnel and effort:

- Grant Specialist reviews the budget form after award to ensure it is aligned with the PI's sponsored application. The specialist follows up with the PI and the PI's administrators to correct any discrepancies.
- Compliance Analyst for Research Administration monitors change in effort and personnel by reviewing:
 - OGM 10s for change in effort and key personnel on a random basis
 - prior approval from the sponsor must be attached to OGM 10
 - Semi-annually, compliance analyst monitors faculty total research activity to confirm that it does not exceed 100% and that effort reductions of 25% or greater have been approved per policy.
 - A discrepancy will be brought to the Grants Specialist and PI's attention.