



- **When exactly is this effective?** – The [effort policy](#) was signed on February 13, 2018, and applies to all new proposals. Effective March 1, 2018, these requirements will apply to all new award set-ups and award modifications.
- **What is 100% effort?** – 100% of effort, institutional effort, or base salary (IBS) are ways of referring to the total time spent on University work within the scope of an individual's CSU appointment during a given period (regardless of how many or how few hours were worked). Total institutional effort will always equal 100% even if the individual's appointment is for less than 1.0 FTE.
- **What is not included in 100% effort?** – This answer can often depend on the details of an individual's academic appointment. However, things like bonuses, one-time payments (honoraria), supplemental pay, external consulting, and community volunteer work are generally not part of their 100% effort (or institutional base salary).
- **Why is it a problem to charge 100% of someone's effort to sponsored projects?** – To comply with the federal standards for documentation of personnel expenses, whenever an individual's salary is charged to sponsored projects, the PI must certify that the portion of salary charged corresponds accurately to the portion of institutional effort devoted to work on those projects. Charging 100% effort to sponsored projects indicates to the sponsor(s) that the individual did not work on anything but those projects during the given period. Generally, faculty cannot commit 100% of their effort to sponsored projects, as time must be reserved for other CSU duties. Administrative Professionals and State Classified staff may devote up to 100% effort to sponsored projects, however, the allocation of effort must be reasonable given the individual's non-sponsored University activities. An auditor may reconcile an individual's certified effort against progress reports, calendar entries, lab books, email correspondence, or proposal submission portal activity.
- **What are some examples of activities that should normally not be charged to sponsored projects?** – The portion of an individual's effort devoted to institutional responsibilities like departmental administration, teaching, serving on committees, attending department meetings, writing proposals, summer vacation, etc. should normally not be charged to sponsored projects. Federal regulations allow for small amounts of time spent on *incidental activities (also referred to as de minimis effort)* to be excluded from the measurement of institutional effort. CSU considers incidental activities (de minimis effort) to be activities that are non-routine, nonrecurring, and together total less than 1% during any month or pay period.
- **Who is included in "Key Personnel"?** - Key personnel is anyone listed as a PI, Co-I, or other key person. CSU's effort policy defines this as the program director/principal investigator and other individuals who are responsible for the scientific design, conduct, and execution of a project substantively and measurably, whether or not they request salaries for compensation. This does not include individuals who fall under the NIH classification of Other Significant

Contributors and are presented at “zero person months” or “as needed.” Per NIH guidance, individuals with measurable effort may not be listed as Other Significant Contributors.

- **Why is it a problem if someone listed as Key Personnel on a sponsored project doesn't document any effort?** – Any individual listed as Key Personnel in a proposal is expected to contribute to the scientific development or execution of the project in a substantive and measurable way. Failure to document at least one percent effort for Key Personnel may indicate to the sponsor that the individual did not provide the necessary contribution(s) or work on the project at all. The sponsor may require that prior written approval be obtained if they perceive this as a change to Key Personnel or a change to the scope of work. Per OMB Memorandum 01-06 -- Clarification of OMB A-21 Treatment of Voluntary Uncommitted Cost Sharing and Tuition Remission Costs referenced in the Uniform Guidance under 2 CFR 200.306 (k):

In addition, 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). Such committed faculty effort shall not be excluded from the organized research base by declaring it to be voluntary uncommitted cost sharing. If a research program/sponsored agreement shows no faculty (or senior researchers) effort, paid or unpaid by the Federal Government, an estimated amount must be computed by the university and included in the organized research base. However, some types of research programs, such as programs for equipment and instrumentation, doctoral dissertations, and student augmentation, do not require committed faculty effort, paid or unpaid by the Federal Government, and consequently would not be subject to such an adjustment.

- **What about these situations...does the 1% minimum effort requirement still apply?**
 - The sponsor does not reimburse faculty salary: Yes, Key Personnel must devote at least one percent effort even if the sponsor will not reimburse CSU for those costs. If there is a match requirement, those costs should be included in the proposal as cost share (if allowable). If the sponsor does not reimburse faculty salary and does not require cost share, the one percent effort should not be quantified in the proposal but will still need to be tracked internally. The salary should be treated as non-reportable cost share and the 1% minimum effort should be captured in a companion cost share account.
 - Equipment Acquisition grants: No*
 - Equipment/Instrument Development grants: Yes, the PI is required to provide oversight of their lab staff as they develop the new research instrument. Therefore, at least a one percent effort commitment should be captured.
 - Dissertation grants: No*

- Conference/Workshop Support grants: No*
- Travel grants: No*
- Participant Support Accounts: No*
- Program Income Accounts: No
- Individual Fellowship/Scholarship awards: No*
- Research grants (not fellowships) for research work primarily being done by a graduate student: Yes, the individual serving as PI is still expected to provide some level of effort for overseeing the project, advising, and facilitating research deliverables.
- Institutional Training grants: Yes, the Training Program Director/Principal Investigator is responsible for the selection/appointment of trainees and the advisory committee (when applicable), and for the overall direction, management, administration, and evaluation of the program. The Training PD/PI is also expected to monitor and assess the program and submit all documents and reports as required.
- Institutional Research Experiences for Undergraduates (REU) programs: Yes, the Program Director/Principal Investigator is responsible for overseeing all aspects of the award.
- Research Experiences for Undergraduates (REU) supplements: No, the PI/Co-I should already have some level of committed effort on the parent research project.
- The Department Chair (or another individual) is serving as the PI as part of Conflict-of-Interest management: Yes, the individual serving as PI is still expected to provide at least the minimum level of effort for their part in overseeing the financial and technical aspects of the project.
- No Cost Extensions for the basic purpose of closing out the award: No
- No Cost Extensions where substantive work must still be completed: Yes**

*Unless the sponsor guidelines or award terms require PI effort. For instance, some fellowship applications require that the faculty mentor provide a Current and Pending Support document in the proposal and that they include THIS proposal and their de minimis effort on it for overseeing the fellow.

**For NCEs if the PI and other Key Personnel on the project will not be charging at least the de minimis 1% effort to the sponsored project account, an NR-CSA must be created, or if one already exists it must be updated, to capture their de minimis 1% effort during the NCE period.