PURPOSE:
The purpose of this policy is to ensure that reporting of salaries charged to externally sponsored activities is managed in a manner consistent with requirements set forth in 2 CFR 200, Federal and State regulations, as well as agency specific guidelines. Failure to comply with UM's policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded activities.

SCOPE:
All UM personnel must be aware of the complex and detailed rules provided under Federal and non-Federal regulations as well as the terms and conditions of the individual sponsored activity. While compliance with all applicable requirements is essential, it is equally important to maintain an open research environment that welcomes the participation of researchers from around the world as part of UM's mission. To maintain this balance, UM personnel must be familiar with this policy in addition to the Federal and non-Federal regulations on restricted sponsored activities.

This policy applies to all UM personnel, namely:
- Faculty, including voluntary faculty.
- Faculty emeriti engaged as active researchers on UM research activities.
- Researchers, including research staff, postdoctoral fellows, and research associates.
- Graduate students, undergraduate students, and interns involved in research programs.
- Staff in departments, centers, institutes, and administrative offices charged with responsibilities under this policy.
- Consultants, agents, and volunteers associated with research and scholarly activities, as well as in departments and offices charged with responsibilities under this policy.

POLICY:
The University of Miami will maintain a hybrid system to track salary charged to sponsored activities in accordance with Federal and State regulations and other agency specific guidelines. As a recipient of Federal funds for sponsored activities, UM is required to comply with OMB Uniform Guidance 2 CFR 200.430, which states compensation for salary, wages, and benefits charged to sponsored activities accurately reflect a reasonable estimate of the time spent working on the project.
UM requires project confirmation statements for all grants, and effort certification statements when any portion of a faculty member’s base compensation is paid from sponsored funds, including University funded cost sharing. The project confirmation statement must account for all salary charged to the project for non-faculty personnel during the period of performance. The effort certification statement must account for all salary charged by the individual faculty for which they are compensated by the University. Effort percentages must be based on total effort, not hours, and must total 100%, even where the number of hours of effort substantially exceeds the “normal” workweek of 37.5 or 40 hours. If the amount of salary charged to an activity is different from the effort that was actually expended on the activity, the correction must be made in the payroll system prior to certifying. Any individual knowingly validating incorrect effort on a sponsored activity could be considered making a false claim; therefore, subject to Federal prosecution.

Project confirmation statements are generated for all grants with non-faculty salary charges during the reporting period. The Principal Investigator on the grant must confirm the salary charged to the project is a reasonable estimate of the effort spent on the project for all non-faculty personnel. In the event this individual is unavailable, a person with first-hand knowledge of the individual’s effort (Supervisor, Manager, and/or other Principal Investigator) can certify on their behalf. Project confirmation statements are generated after the close of the reporting cycle and are due within 60 days of distribution.

Effort certification statements are generated for all faculty with compensation or cost share pertaining to sponsored activities during the reporting period. The individual performing work must certify an effort report. In the event this individual is unavailable, a person with first-hand knowledge of the individual’s effort (Supervisor, Manager, and/or other Principal Investigator) can certify on their behalf. Effort reports are generated after the close of the reporting cycle and are due within 60 days of distribution.

After a project has been confirmed or effort has been certified, any changes (increase or decrease) to the percent of effort charged to a sponsored activity, must be requested with reasonable justification as to why the original certification is being changed. In most circumstances, the expenses related to the change in effort will be charged to the department. Any exceptions will be reviewed on a case-by-case basis.

DEFINITIONS:
Please refer to UM’s ORA website for a list of acronyms and terms commonly used in sponsored/ research administration grants, contracts, and cooperative agreements: http://ora.miami.edu/assets/pdf/ora-policies/glossary.pdf

PROCEDURE:
UM personnel are to use UM's ORA website for guidance on matters pertaining to sponsored activities.

UM personnel are to follow the Standard Operating Procedures (SOP) outlined, as well as utilize the various required forms and templates that have been implemented for the activities related to this policy.

UM personnel should contact the Pre or Post Award staff for consultation if additional information is needed. Contact information can be found on UM's ORA Contacts Webpage.