Fiscal Policy

Title: Direct Charges to Federally Sponsored Projects, 4-7

Source: Office of Grants and Contracts

Prepared by: Director of the Office of Grants and Contracts

Approved by: Vice Chancellor for Research

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Applies to: All Campuses

A. Introduction

On November 8, 1994, the federal government issued regulations requiring universities to comply with four Cost Accounting Standards (CAS) passed by the CAS Board (CASB), relating to contracts involving federal funds. Coverage of these standards was extended to grants and cooperative agreements by the Office of Management and Budget’s (OMB) May 8, 1996, revision to Circular A-21, *Cost Principles for Educational Institutions* (OMB A-21). In addition to the requirements identified in OMB Circular A-21, specific direction has been issued restricting expenditures for certain purposes. The University of Colorado Denver (UCD) is responsible for filing a Disclosure Statement (DS-2) with the Department of Health and Human Services (DHHS) which describes its accounting practices, policies and procedures for assigning costs to federally sponsored projects, and attests to the consistency of those practices.

Charges to federally funded projects that are not in compliance with cost principles and standards are subject to being refunded to the federal government. Audit findings per OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, represent both a financial and a reputation exposure often associated with the negative publicity about disallowed costs for the institution.

This policy represents UCD’s best judgment about the appropriate application of OMB A-21 requirements of costs charged to research grants, at this time, and under present and reasonably foreseeable circumstances. This policy is not a comprehensive and legal restatement of all of OMB A-21’s requirements. Within OMB A-21’s framework, this policy is intended to provide support for UCD’s research activities.
Responsibility

Each UCD administrative unit (defined as part of a school, college, department, division, center, institution section or large program) is responsible for complying with and enforcing this policy and related procedures. Any penalties, disallowances or losses of funding caused by non-compliance with this policy will be the responsibility of the administrative unit in violation.

1. UCD Administration Responsibilities

UCD administration is responsible for developing a set of operating principles and guidelines that comply with OMB A-21 and CASB standards, and clearly delineate those research-related expenses identified as direct costs versus facilities and administrative (F&A) costs. UCD administration is responsible for providing thorough fiscal policy, communicating policy changes to the faculty and staff, and overseeing the implementation of policy. The Office of Grants and Contracts (OGC) is the unit designated to carry out policy oversight responsibilities for the UCD.

2. Administrative Unit Responsibilities

Each school or college has ultimate responsibility for implementing and monitoring compliance with this policy. Each school or college is responsible for clearly delineating the responsibilities between the school or college and its administrative units. Administrative units are the primary support for providing the principal investigator (PI) with the information necessary to fulfill his/her fiduciary and sponsored project management responsibilities.

3. PI Responsibilities

Responsibility for scientific and budgetary decision-making in research grants and contracts, following UCD policies, is assigned to and must be accepted by the individual designated as the PI for the contract or grant. These decisions must be recorded in a manner that assures their subsequent accurate implementation. The PI is responsible for giving the administrative unit instructions on specific allocation of funds based on a “facts and circumstances” test that considers the needs of the project. While the administrative unit administrators provide PIs essential management support in this area, PIs are responsible for making the crucial financial decisions related to costs.

4. Applicability

To ensure the consistent treatment of costs, UCD has incorporated OMB A-21 cost accounting principles into its accounting practices and adopted these principles as policy for costs on federal awards, whether awarded directly to UCD as a prime recipient, or indirectly through a sub-agreement from another institution. These principles apply except to the extent they are modified in writing by awarding agencies via project regulations, policy statements, guidelines or other instructions. This policy does not normally apply to non-federal sponsored projects.

Administrative expenses which directly benefit awards and are allowable per the award may be charged directly to those awards. However, this policy does apply if the non-federal sponsor receives federal funding for the project, specifically adopts OMB A-21 guidelines, or has its own policies restricting administrative charges. Expenditures must follow the sponsor policies and award guidelines.
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1. CAS 9905.501 - Consistency in estimating, accumulating and reporting costs.
2. CAS 9905.502 - Consistency in allocating costs incurred for the same purpose.
3. CAS 9905.505 - Accounting for unallowable costs.
4. CAS 9905.506 - Cost accounting period.
5. Office of Management and Budget (OMB) Circular A-21, Cost Principles for Educational Institutions (OMB A-21)
7. Executive Order 13505: Removing Barriers to Responsible Scientific Research Involving Human Stem Cells
8. National Institutes of Health Guidelines on Human Stem Cell Research

D. Definitions

1. Capital Equipment is an article of non-expendable tangible personal property having a useful life of more than one year and an acquisition cost of $5,000 or more. This includes donated equipment, and equipment being constructed where component parts may be less than $5,000 each, but the total cost will be $5,000 or more.

2. Direct Costs are costs that can be identified specifically with a particular UCD project, or that can be assigned to such activities relatively easily with a high degree of accuracy.

3. Facilities & Administrative (F&A) Costs are those that are incurred for common or joint objectives and therefore cannot be identified readily and specifically.
a. Examples of facilities costs include building depreciation, maintenance and repairs, health and safety, grounds maintenance, and security.

b. Examples of administrative costs include administrative and clerical salaries, local telephone service, membership dues, office supplies and postage.

4. **Sponsored Projects** Sponsored Projects are research, instructional, or public service activities that are related to the mission of the UCD and sponsored by external agencies or entities. If an award meets at least one of the following criteria, it is likely a Sponsored Project. However, the existence of any one of the criteria may not be determinative.

   a. The award is a grant or contract from a governmental entity, unless exempted under OMB Circular A-21.
   
   b. The proposal responds to a Request for Application (RFA), Request for Proposal (RFP), or other formal solicitation, and the project is initiated by notice of award. Certain RFPs issued by private charitable foundations may not qualify as a Sponsored Project.
   
   c. The award includes terms that bind the university to a list of scholarly or scientific inquiry.
   
   d. The Statement of Work specifies programmatic objectives mutually agreed upon by the university and the sponsor, which are to be accomplished within a specific period of time or within a detailed budget framework.
   
   e. The sponsor is entitled to receive the following types of deliverables: a detailed technical report of research results, milestone reports, or a required report of allowable expenditures. Certain reporting requirements of private charitable foundations that are stewardship- or accountability-oriented may not qualify as Sponsored Projects.
   
   f. The award requires separate accounting procedures and detailed financial reports.
   
   g. The sponsor requires the return of unexpended funds or only reimburses for incurred costs (expenditure-driven).
   
   h. The award provides for compliance audits by or on behalf of the sponsor, which may or may not include a financial audit.
   
   i. The award is for a project requiring compliance oversight including, but not limited to: human subjects, animal use, biohazards, or bio-safety.
   
   j. The award terms include publication or data restrictions or monitoring.
   
   k. The sponsor requests intellectual property rights or controls the disposition of capital equipment.
   
   l. The award is by a sponsor who has licensing rights to inventions from the same lab/researcher benefiting from the award.
   
   m. The sponsor designates a sponsor employee (agent) as project technical monitor (as opposed to designating a contact person to improve communications).
   
   n. The award is for a sub-award project under a federal award.
   
   o. The award requires a matching or cost sharing commitment on the part of the university.
   
   p. The award generates program income to a federal award.
   
   q. The award from the sponsor is for membership fees to centers and affiliate programs. The university may receive membership fees for its centers and affiliate programs, as characterized by any one of the following examples:
   
      i. The member agreement imparts "Center Member" status to the sponsor.
ii. The member receives the right to exert any type of control over the operation of the institute, center or program.

iii. The member receives special or discounted access to laboratories or other university facilities for its use.

iv. The member receives patent, licensing rights, or other intellectual property rights provisions benefiting the sponsor.

E. Policy Statement

1. Requirements

Adherence to the federal cost principles and requirements outlined in OMB A-21 is critical to the acceptance and allowance of UCD charges to federally sponsored projects. The basic requirements for all sponsored projects are:

a. Costs must be reasonable and necessary for the performance of the sponsored project, and incurred within the project period. Failure to adequately document a cost could result in disallowance of a legitimate charge.

b. Costs must be allocable to the project. For costs benefiting more than one sponsored project, the relative benefit must be approximated through the use of a reasonable basis reflecting use or level of service. Costs should be allocated to the projects in proportion to the benefits received.

c. Costs must be consistently treated as either direct or F&A costs. Consistency, in this context, means that costs incurred for the same purpose, in like circumstances, must be treated uniformly as either direct costs or as F&A costs. Thus, certain types of costs, such as salaries of administrative/clerical staff, office supplies, and postage are normally treated as F&A costs. The same types of costs cannot be charged directly to federally sponsored agreements unless the circumstances related to a particular project are clearly different from the normal operations of the institution. For example, although postage is normally treated as a F&A cost, a particular project may have a special need for postage because of the mailing of hundreds of survey questionnaires. In this case, it would be appropriate to charge the project directly for the postage to mail the questionnaires since this would constitute "unlike circumstances" compared to routine postage requirements.

2. Direct Charging Practices that Are Not Allowable

OMB Circular A-21 requires that direct costs "be identified specifically with particular sponsored project... relatively easily with a high degree of accuracy." Special care should be exercised to ensure that costs incurred for the same purpose in like circumstances are treated consistently as either direct costs or F&A costs. For example, salaries of technical staff, laboratory or research supplies (e.g., chemicals), telephone toll charges, animals, animal care costs, human subject payments, equipment, computer costs, travel costs, and specialized shop costs shall be treated as direct costs wherever identifiable to a particular project. Direct charging of these costs may be accomplished through specific identification of individual costs benefiting sponsored projects or through Service Centers as appropriate under the circumstances.

Examples of direct charging practices not acceptable to sponsored projects:

a. Rotation of charges among sponsored projects by month without establishing that the rotation schedule credibly reflects the relative benefit to each grant.
b. Assigning charges to the sponsored project with the largest remaining balance or other basis outside of the benefit to the project.

c. Charging the budget amount in contrast to charging an amount based on actual usage.

d. Assigning charges to sponsored projects in advance of the time the cost is incurred.

e. Assigning charges to sponsored projects that were incurred outside of the project period, including a pre-award period if applicable.

f. Identifying a cost as something other than what it actually is.

g. Charging expenses exclusively to sponsored projects when the expense has supported non-sponsored project activities.

h. Assigning charges that are part of the normal administrative support for contracts and grants (e.g., proposal preparation, accounting, payroll).

i. Charging ending sponsored projects to expend funds without regard to the appropriateness of the costs.

j. Shifting costs to other sponsored projects due to cost overruns, avoidance of restrictions imposed by law, or for convenience. Convenience would include charging a direct cost to a project on a temporary basis, pending the set-up of a new project account number.

k. Charging administrative costs directly to sponsored projects because the administrative unit requires the PIs to fund these costs (i.e. telephone, office supplies).

Note: Special circumstances may be included in the terms of award or in overreaching principles. For example, no federal funds can be used for stem cell research for “(1) the derivation or use of stem cell lines derived from newly destroyed embryos; (2) the creation of any human embryos for research purposes; or (3) the cloning of human embryos for any purpose.”

3. **Direct Charging Administrative Costs that are Normally Considered F&A**

a. **Conditions to Direct Charge Administrative Costs**

Direct charging administrative costs may be appropriate if the expense meets all of the following conditions:

i. The cost is specified in the proposed budget of the sponsored agreement, and the special circumstances requiring direct charging are justified in the proposal; and

ii. The sponsoring agency accepts the cost as part of the project’s direct cost budget (i.e., does not specifically disapprove the cost in the award or other notification to the UCD). For projects that do not require submission of a project budget to the sponsoring agency, the cost must be justified and accepted by the Office of Grants and Contracts.
It should be noted that approval of the budget by an agency (i.e. NIH) does not necessarily make the administrative costs appropriate. NIH states that the organization is responsible for presenting costs consistently and must not include costs associated with their F&A rate as direct costs.

iii. Special Project Needs

(a) The project has a special need for the item or service that is beyond the level of services normally provided by the administrative unit personnel because it is considered a “major” project by OMB A-21 standards; (See Exhibit C for examples); or,

(b) The cost can be specifically identified to the technical scope of Work conducted under the project and is appropriately documented. The project does not need to be major for those costs to qualify as technical costs and to be charged directly. They must, however, meet the other conditions in this Section E.1 in order to be directly charged.

(c) The cost must meet basic requirements identified in Section E.1 of this policy.

iv. If the cost meets the conditions described above but was not in the approved budget, it may be charged directly only if:

(a) UCD has re-budgeting authority under federal regulations or the terms of the award or sponsor allows for changes; and,

(b) Written justification is prepared (see Exhibits for location specific processes) which adequately explains the need for the cost and why it was not included in the proposal submitted to the sponsoring agency; and,

(c) Acceptance is provided by OGC.

See Exhibit C for more details on when costs that are typically administrative in nature can be directly charged to a sponsored project.

4. Restriction on the Use of Federal Funds for Stem Cell Research

UCD PIs and staff, who conduct research in laboratories where there is both federal and non-federal funding, must separate allowable and unallowable activities in such a way that permits the costs incurred in the research to be allocated consistently to the appropriate funding source. An investigator that receives federal funding and is planning to derive new human embryonic stem cell lines may do the derivation in his/her university-supported laboratory as long as the PI carefully and consistently allocates all costs of doing the derivation to a non-federal funding source.

According to the National Institutes of Health, “Research on human embryonic stem cell lines may receive NIH funding if the cell line meets the following criteria: removal of cells from the embryo must have been initiated before August 9, 2001, when the President outlined this policy; and the embryo from which the stem cell line was derived must no longer have had the possibility of developing
further as a human being. The embryo must have been created for reproductive purposes but no longer be needed for them. Informed consent must have been obtained from the parent(s) for the donation of the embryo, and no financial inducements for donation are allowed.

“In order to ensure that federal funds are used to support only stem cell research that is scientifically sound, legal, and ethical, NIH examines stem cell lines and maintains a registry of those lines that satisfy the criteria.”

5. **Other Types of Direct Charging**

This policy covers all direct charging to sponsored projects. The other types of costs that are direct charged to sponsored projects are covered in the following Exhibits:

a. Exhibit C, Administrative Costs. Provides explanation of when it is and is not appropriate to direct charge expenses that are typically administrative.

b. Exhibit D, Faculty and Other Salary. Explains direct charging Faculty and other research salaries and the required Personnel Effort Reporting for these salary charges.

c. Exhibit F, Quick Reference for Sponsored Projects Expenditures. This guide covers basic expenditures on sponsored projects and provides information on whether these costs can be direct charged to sponsored projects.
Exhibit A – Procedures for Direct Charging Administrative Expenses

1. **Checklist for Direct Charging Administrative Costs**

To ensure consistency among all sponsored projects at the University of Colorado Denver (UCD) for direct charging of administrative costs, the PI must complete the Checklist (See Exhibit B-1) indicating the reasons for the direct charging if the project does not qualify as an exception identified in Section 2 below. The Checklist will be reviewed by the Office of Grants and Contracts.

2. **Types of Federal Awards That Do Not Require a Checklist**

Administrative salaries and other types of administrative costs may be allowable for the following types of federal awards. If administrative activities and/or costs are required to complete one of the following types of federal awards, a Checklist or supplemental documentation is not required if the other requirements in Section E.3.a. of the accompanying policy are met.

   a. Program Projects
   b. Center Grants
   c. Fellowships **
   d. Training Grants **
   e. Conference Grants
   f. Grants to develop and/or disseminate educational manuals or materials

For projects not listed above, if there is a need for direct charging of administrative costs, a Checklist should be completed.

**Note**: Fellowships and training grants do not need to submit a Checklist even if costs are not included in the budget. Costs still need to comply with terms of the agreement.

3. **Use of the Checklist**

The Checklist (Exhibit B-1) is to be completed when the following administrative costs that are normally treated as F&A costs are proposed or anticipated after the proposal has been awarded as a direct cost to a federally sponsored project:

   a. Administrative or clerical salaries
   b. Local telephone service
   c. Membership dues in a technical or professional organization
   d. Office Supplies
   e. Postage
This includes any projects that do not submit a budget to the sponsor, such as NIH modular grants. There are types of awards that do not require a Checklist. See Section 2 above for details.

4. Review and Acceptance of the Checklist
Grants and Contracts will review completed checklists to determine whether the administrative costs fit the definitions making them appropriate for direct charging based on UCD Fiscal Policy and OMB A-21.

The Checklist must be signed by the PI, Department Chair or designee, and Grants and Contracts. If the Checklist is not accepted and the charge has already been directly charged to the project, the administrative unit must then transfer the cost from the project to an appropriate funding source that allows the type of cost per UCD Fiscal Policies and policies within each School. The PI should contact the unit administrator for assistance.
University of Colorado Denver
Instructions for A-21 Checklist for Direct Charging of Administrative Costs to Federal Projects

WHY IS THE CHECKLIST REQUIRED? Federal regulations (OMB A-21) require that costs must be consistently treated as either direct or F&A (Facilities and Administrative) costs. Consistency, in this context, means that costs incurred for the same purpose, in like circumstances, must be treated uniformly as either direct costs or as F&A costs. Thus, since certain types of costs, such as the salaries of administrative/clerical staff, membership dues, office supplies, postage, and local telephone are normally treated as F&A costs, the same types of costs cannot be charged directly to federally sponsored agreements, unless the circumstances related to a particular project are clearly different from the normal operations of the institution. The Checklist is used to ensure that the University of Colorado Denver (UCD) is consistent in their treatment of administrative costs for all federally sponsored projects at UCD. This form is for internal use only.

For more details see Fiscal Policy 4-7, Direct Charges to Federally Sponsored Projects.

WHEN IS THE CHECKLIST REQUIRED? This Checklist is to be completed when the following costs that are normally treated as F&A costs are proposed or anticipated after the proposal has been awarded as a direct cost to a federally sponsored project or federal flow-through project:

1. Administrative or clerical salaries
2. Local telephone service
3. Membership dues in a technical or professional organization
4. Office Supplies
5. Postage

EXCEPTIONS:
The types of projects listed below do not need to complete a Checklist if 1) the cost is specified in the proposed budget of the sponsored agreement, and the special circumstances requiring direct charging are justified in the proposal; and 2) The sponsoring agency accepts the cost as part of the project’s direct cost budget (i.e., does not specifically disapprove the cost in the award or other notification to the University); and 3) costs meet basic federal requirements, i.e., benefit project, reasonable and necessary for performance of agreement.

1. Program Projects
2. Center grants
3. Fellowships**
4. Training grants**
5. Conference grants
6. Grants to develop and/or disseminate educational manuals or materials

For these projects, although a Checklist is not required, Grants and Contracts may review budget justifications and costs and follow-up with departments to resolve any questions.

**Note: Fellowships and training grants do not need to submit a Checklist even if costs are not included in the budget. Costs still need to comply with terms of the agreement.

WHAT IS THE CRITERIA TO ALLOW A DIRECT CHARGE? In addition to completion and approval of this Checklist, direct charging of an administrative cost must meet all of the following conditions:

1. The cost is specified in the proposed budget of the sponsored agreement, and the special circumstances requiring direct charging are justified in the proposal.

2. The sponsoring agency accepts the cost as part of the project’s direct cost budget (i.e., does not specifically disapprove the cost in the award or other notification to the University). For projects that do not require submission of a project budget to the sponsoring agency, e.g., NIH modular grants, the cost must be justified and approved by Grants & Contracts by submission of the “Checklist” described later in Section E. It should be noted that approval by an agency (i.e. NIH) does not necessarily make the administrative costs appropriate. NIH states that the organization is responsible for presenting costs consistently and must not include costs associated with their F&A rate as direct costs. The Checklist is the tool used to ensure consistent treatment of administrative costs at UCD.
3. Special Project Needs

a. The project has a special need for the item or service that is beyond the level of services normally provided by the administrative unit personnel because it is considered a “major” project by OMB A-21 standards. See examples in UCD Fiscal Policy 4-7, Section E.3.

Or

b. The cost can be specifically identified to the technical scope of work conducted under the project and is appropriately documented. The project does not need to be major for those costs to qualify as technical costs and to be charged directly. They must, however, meet the other conditions in Section E.1 in order to be directly charged.

4. The cost must meet basic federal requirements identified in Section E of the policy.

5. If the cost meets the conditions described above, but was not in the approved budget, it may be charged directly only if:

a. UCD has re-budgeting authority if different category under Federal regulations or the terms of the award or sponsor approves changes.

b. Written justification is prepared (via the Checklist) which adequately explains the need for the cost and why it was not included in the proposal submitted to the sponsoring agency.

c. Acceptance is provided by Grants & Contracts.

WHAT ARE EXAMPLES OF PROJECTS THAT DIRECT CHARGING MAY BE APPROPRIATE?

Below are examples of circumstances under which it may be appropriate to directly charge federally sponsored projects for administrative costs:

1. Large, complex programs, such as Clinical and Translational Science Award Programs, Primate Centers, Program Projects, environmental research centers, engineering research centers, and other programs that entail assembling and managing teams of investigators from a number of institutions;

2. Programs that involve extensive data accumulation, analysis and entry, surveying, tabulation, cataloging, searching literature, and reporting, such as epidemiological studies, clinical trials, and retrospective clinical records studies;

3. Programs that require travel and meeting arrangements for large numbers of participants, such as conferences and seminars;

4. Programs with a principal focus of preparing and producing manuals and large reports, books and monographs (excluding routine progress and technical reports);

5. Programs that are geographically inaccessible to normal departmental administrative services, such as seagoing research vessels, radio astronomy projects, and other research field sites that are remote from the campus;

6. Individual programs requiring specific database management; individualized graphics or manuscript preparation; human or animal protocol; Institutional Review Board (IRB); and multiple program-related investigator coordination and communications.

These above examples are not exhaustive, and are not intended to imply that direct charging of administrative or clerical salaries/supplies would always be appropriate for the situations illustrated in the examples. When direct charges for administrative and clerical salaries/supplies are made, care must be exercised to assure that costs incurred for the same purpose in like circumstances are consistently treated as direct costs for all activities. This “Checklist” is a tool to provide consistency in the treatment of costs among all federally sponsored projects at UCD.
Proposal Routing No., or PeopleSoft Project No. if already awarded: ___________________________________________

Sponsor’s Award Number, if already awarded: _______________________________________________________________

PI: ___________________________ Sponsor: _________________________________________________________________

Purpose of Form: This form is divided into five types of costs that are generally charged to the sponsor via the Facilities & Administration (F&A) rates, but under the unusual circumstances, described below, can be approved to be included as a direct charge. For the purposes of this form, these types of direct charges will be collectively referred to as A-21 charges.

- Please note that this checklist does not need to be completed for the following:
  Direct awards from non-federal sponsors
  Program Project Grants (NIH example, P01)
  Center Grants (NIH example, P30)
  Fellowships (NIH example, F awards)
  Training Grants (NIH example, T awards)
  Conference Grants (NIH example, R13 and U13)

Two of the most common reasons that justify direct charging these types of expenses are defined as follows:

- Technical - the cost category may imply that the items are being used for administrative purposes. Checking this box indicates that the item will be used ONLY to meet the scientific, technical and/or programmatic requirements of the project being charged. Storage of supplies must be segregated from general use items, and the account code to be used should reflect the technical usage rather than general usage.

- Above standard level of service/items - because all projects require a certain amount of account reconciliation, office supplies, correspondence, phone calling, etc., checking this box indicates that the project requires items/services above the standard level of service normally required on a research project. Checking this box requires a brief explanation of why such items are significantly greater than the routine level. Provide quantifiable data, such as amount of effort required for tasks, number of surveys being conducted, number of conference participants, etc. Attach the narrative to the Checklist.

Instructions:

1. For each type of cost listed in the sub-headings below, check the applicable costs you are requesting to be charged as a direct charge and provide a complete description the applicable reason.

2. If this award will not incur these types of costs as direct charges, please check the box below and sign on page 4 of this form.

   - This award will not incur any A-21 charges as defined above.

3. If this award will incur A-21 direct charges, please indicate if these costs were identified as direct costs in the proposal budget and narrative by checking the box below next to each cost that was included:

   - Administrative Salaries
   - Membership Dues
   - Office Supplies
   - Postage
   - Telephone

4. Please return the completed from to the Grants and Contracts Postaward Administrator for the award, Campus Box F428. The completed form should be returned within 30 days of receipt, or within 30 days of incurring an A-21 Checklist expense.
I. Administrative Salaries:

This section applies to only those positions that consist of mainly administrative responsibilities, such as Department Administrative Assistants, Department and Divisional Administrators, etc. It excludes positions that consist of technical responsibilities such as laboratory technicians and professional research assistants where clerical duties do not exceed 25 percent of their total duties.

☐ Technical. Please check this box only if an administrative position is completing technical tasks. In addition, please indicate what type of technical tasks/activities, this person is completing:

☐ Research data gathering
☐ Research data cleaning
☐ Laboratory technician activities
☐ Conducting computer research work specifically related to the project
☐ Conducting telephone surveys
☐ Research training
☐ Programmatic project effort
☐ Tabulate research results
☐ Database maintenance for project data
☐ Preparing IRB protocols
☐ Preparing progress reports
☐ Computer programming for the project
☐ Clinical and patient activities such as: scheduling patient visits, processing payments for patients, interviewing patients, physical exams, blood drawing, height and weight measurement, and extraordinary effort in formalizing physician reports
☐ Writing project manuscripts for publication
☐ Library searches
☐ Other. If related to the specifically to the technical aspect of the project, no further explanation is required.

☐ Above standard level of administrative services provided. Please check this box if Administrative personnel is providing above-average level of administrative duties. Also, check the box corresponding to the type of the above-average-level duties being performed.

☐ Extraordinary effort in grant related transcription
☐ Extraordinary and extensive data entry
☐ Above average amount of material development for presentations
☐ Large conference planning and organization

Note: Duties must correlate to the effort/salary charged to the sponsored project.

If the type of duties being performed is not listed above, please describe these duties on the line provided below:

________________________________________
________________________________________
________________________________________
**II. Membership Dues:**

- ☐ Membership dues in technical/professional organization
  - ☐ Membership dues required in order to attend a conference, where the conference is a specific requirement of the sponsored project. (This form not required if part of registration fee and coded appropriately)
  - ☐ Membership dues required to subscribe to journal, where subscription is a specific requirement of the sponsored project. (This form not required if part of subscription fee and coded appropriately)
  - ☐ Other, please provide benefit to the project and if required for the project to meet its goals:

__________________________________________________________________________________________
__________________________________________________________________________________________

**III. Office Supplies:**

- ☐ Office supplies
  - ☐ Technical: For general office supplies used for technical purposes and segregated from general supplies. Please note that this form not required if using “technical account code” (480118 – Office Supplies Technical).
  - ☐ Above standard level of services/items required. Please describe the supplies being used, how they benefit the project and how the consumption level is greater than average.

__________________________________________________________________________________________
__________________________________________________________________________________________

**IV. Postage:**

- ☐ Postage
  - ☐ Technical: Used to mail items for the technical conduct of the study. This excludes mailing of routine reports such as progress reports and proposals.
  - ☐ Above standard level of services/items required. Please describe what is being mailed, how it benefits the project, and the quantity that would support a level greater than average.

__________________________________________________________________________________________
__________________________________________________________________________________________

**V. Telephone**

- ☐ Telephone (local services)

  Usage of an additional phone line must be based on project’s need and used exclusively for the sponsored project being charged. Please provide a description of the use of this additional local service and the benefit to the project:

__________________________________________________________________________________________
__________________________________________________________________________________________
A-21 Checklist for Direct Charging of Administrative Costs to Federal Projects

APPROVALS

By signing below, the Principal Investigator, Department Administrator, and Chair certify the accuracy of the information and agree to ensure that full compliance to the University’s Direct Charging policy (UCD Fiscal Policy 4-7) is both achieved and maintained. Payback of violations and/or disallowed exceptions will be the responsibility of the Principal Investigator and administrative unit.

Principal Investigator Name (please print): ________________________________________________________________

Principal Investigator Signature: __________________________ Date: __________________

Return Instructions: Upon completion and signature of this form, please return it to the award’s Postaward Administrator in Grants and Contracts, Campus Box F428. The completed form should be returned to Grants and Contracts within 30 days of receipt, or within 30 days of incurring an A-21 Checklist expense.

Grants and Contracts Acceptance:

Based ONLY on the information provided above, Grants and Contracts accepts that project meets requirement for consistency in direct charging. Administrative units are responsible to ensure that all direct charges are in compliance with UCD Fiscal Policy 4-7.

Acceptance for direct costs:

- Administrative or clerical salaries YES □ NO □
- Telephone (local services) YES □ NO □
- Membership dues in a technical or professional organization YES □ NO □
- Office Supplies YES □ NO □
- Postage YES □ NO □

If not accepted as meeting requirements for consistency in direct charging, and costs have already been charged to the project, the department will need to move these costs to a funding source that allows the type of cost per UCD Fiscal Policies.

Grants and Contracts Representative Name (please print): __________________________________________________________

Grants and Contracts’ Signature: _________________________________________________________ Date: ______________
University of Colorado Denver

A-21 Checklist for Direct Charging of Administrative Costs to Federal Projects

Proposal Routing No., or PeopleSoft Project No. if already awarded: ___________________________________________

Sponsor’s Award Number, if already awarded: ___________________________________________________________

PI: ___________________________ Sponsor: _____________________________________________________________

Purpose of Form: This form is divided into five types of costs that are generally charged to the sponsor via the Facilities & Administration (F&A) rates, but under the unusual circumstances, described below, can be approved to be included as a direct charge. For the purposes of this form, these types of direct charges will be collectively referred to as A-21 charges.

- Please note that this checklist does not need to be completed for the following:
  - Direct awards from non-federal sponsors
  - Program Project Grants (NIH example, P01)
  - Center Grants (NIH example, P30)
  - Fellowships (NIH example, F awards)
  - Training Grants (NIH example, T awards)
  - Conference Grants (NIH example, R13 and U13)

Two of the most common reasons that justify direct charging these types of expenses are defined as follows:

- Technical - the cost category may imply that the items are being used for administrative purposes. Checking this box indicates that the item will be used ONLY to meet the scientific, technical and/or programmatic requirements of the project being charged. Storage of supplies must be segregated from general use items, and the account code to be used should reflect the technical usage rather than general usage.

- Above standard level of service/items - because all projects require a certain amount of account reconciliation, office supplies, correspondence, phone calling, etc., checking this box indicates that the project requires items/services above the standard level of service normally required on a research project. Checking this box requires a brief explanation of why such items are significantly greater than the routine level. Provide quantifiable data, such as amount of effort required for tasks, number of surveys being conducted, number of conference participants, etc. Attach the narrative to the Checklist.

Instructions:

1. For each type of cost listed in the sub-headings below, check the applicable costs you are requesting to be charged as a direct charge and provide a complete description the applicable reason.

2. If this award will not incur these types of costs as direct charges, please check the box below and sign on page 4 of this form.

   This award will not incur any A-21 charges as defined above.

3. If this award will incur A-21 direct charges, please indicate if these costs were identified as direct costs in the proposal budget and narrative by checking the box below next to each cost that was included:

   Administrative Salaries
   Membership Dues
   Office Supplies
   Postage
   Telephone

4. Please return the completed form to the Grants and Contracts Postaward Administrator for the award, Campus Box F428. The completed form should be returned within 30 days of receipt, or within 30 days of incurring an A-21 Checklist expense.
I. Administrative Salaries:

This section applies to only those positions that consist of mainly administrative responsibilities, such as Department Administrative Assistants, Department and Divisional Administrators, etc. It excludes positions that consist of technical responsibilities such as laboratory technicians and professional research assistants where clerical duties do not exceed 25 percent of their total duties.

Technical. Please check this box only if an administrative position is completing technical tasks. In addition, please indicate what type of technical tasks/activities, this person is completing:

- Research data gathering
- Research data cleaning
- Laboratory technician activities
- Conducting computer research work specifically related to the project
- Conducting telephone surveys
- Research training
- Programmatic project effort
- Tabulate research results
- Database maintenance for project data
- Preparing IRB protocols
- Preparing progress reports
- Computer programming for the project
- Clinical and patient activities such as: scheduling patient visits, processing payments for patients, interviewing patients, physical exams, blood drawing, height and weight measurement, and extraordinary effort in formalizing physician reports
- Writing project manuscripts for publication
- Library searches
- Other. If related to the specifically to the technical aspect of the project, no further explanation is required.

Above standard level of administrative services provided. Please check this box if Administrative personnel is providing above-average level of administrative duties. Also, check the box corresponding to the type of the above-average-level duties being performed.

- Extraordinary effort in grant related transcription
- Extraordinary and extensive data entry
- Above average amount of material development for presentations
- Large conference planning and organization

Note: Duties must correlate to the effort/salary charged to the sponsored project.

If the type of duties being performed is not listed above, please describe these duties on the line provided below:

_______________________________________________________________________________________________________

_______________________________________________________________________________________________________

_______________________________________________________________________________________________________

_______________________________________________________________________________________________________
II. Membership Dues:

Membership dues in technical/professional organization
- Membership dues required in order to attend a conference, where the conference is a specific requirement of the sponsored project. (This form not required if part of registration fee and coded appropriately)
- Membership dues required to subscribe to journal, where subscription is a specific requirement of the sponsored project. (This form not required if part of subscription fee and coded appropriately)
- Other, please provide benefit to the project and if required for the project to meet its goals:
  ____________________________________________________________________________  
  ____________________________________________________________________________

III. Office Supplies:

Office supplies
- Technical: For general office supplies used for technical purposes and segregated from general supplies. Please note that this form not required if using “technical account code” (480118 – Office Supplies Technical).
- Above standard level of services/items required. Please describe the supplies being used, how they benefit the project and how the consumption level is greater than average.
  ____________________________________________________________________________  
  ____________________________________________________________________________

IV. Postage:

Postage
- Technical: Used to mail items for the technical conduct of the study. This excludes mailing of routine reports such as progress reports and proposals.
- Above standard level of services/items required. Please describe what is being mailed, how it benefits the project, and the quantity that would support a level greater than average.
  ____________________________________________________________________________  
  ____________________________________________________________________________

V. Telephone

Telephone (local services)

Usage of an additional phone line must be based on project’s need and used exclusively for the sponsored project being charged. Please provide a description of the use of this additional local service and the benefit to the project:
  ____________________________________________________________________________  
  ____________________________________________________________________________
University of Colorado Denver  
A-21 Checklist for Direct Charging of Administrative Costs to Federal Projects

APPROVALS

By signing below, the Principal Investigator, Department Administrator, and Chair certify the accuracy of the information and agree to ensure that full compliance to the University's Direct Charging policy (UCD Fiscal Policy 4-7) is both achieved and maintained. Payback of violations and/or disallowed exceptions will be the responsibility of the Principal Investigator and administrative unit.

Principal Investigator Name (please print): ____________________________________________
Principal Investigator Signature: ______________________________________Date: __________

Return Instructions: Upon completion and signature of this form, please return it to the award’s Postaward Administrator in Grants and Contracts, Campus Box F428. The completed form should be returned to Grants and Contracts within 30 days of receipt, or within 30 days of incurring an A-21 Checklist expense.

Grants and Contracts Acceptance

Based ONLY on the information provided above, Grants and Contracts accepts that project meets requirement for consistency in direct charging. Administrative units are responsible to ensure that all direct charges are in compliance with UCD Fiscal Policy 4-7.

Acceptance for direct costs:

- Administrative or clerical salaries [YES] [NO]
- Telephone (local services) [YES] [NO]
- Membership dues in a technical or professional organization [YES] [NO]
- Office Supplies [YES] [NO]
- Postage [YES] [NO]

If not accepted as meeting requirements for consistency in direct charging, and costs have already been charged to the project, the department will need to move these costs to a funding source that allows the type of cost per UCD Fiscal Policies.

Grants and Contracts Representative Name (please print): ____________________________________________
Grants and Contracts’ Signature: ______________________________________Date: __________
Exhibit C – Direct Charging Administrative Costs that are Normally Considered F&A

1. Examples of Projects that May Allow Administrative Costs as Direct Charges

Administrative and clerical salaries should normally be treated as F&A costs. It may be appropriate to directly charge administrative or clerical salaries for “major” projects or activities when the administrative or clerical salary is explicitly budgeted for and the individuals involved can be specifically identified with the project or activity. The following examples of “major projects” illustrate circumstances when it may be appropriate to directly charge federally sponsored projects for administrative costs:

a. Large, complex programs, such as Clinical and Translational Science Award Programs, Primate Centers, Program Projects, environmental research centers, engineering research centers, and other programs that entail assembling and managing teams of investigators from a number of institutions;

b. Programs that involve extensive data accumulation, analysis and entry, surveying, tabulation, cataloging, searching literature, and reporting, such as epidemiological studies, clinical trials, and retrospective clinical records studies;

c. Programs that require continual travel and meeting arrangements for large numbers of participants, such as conferences and seminars;

d. Programs with a principal focus of preparing and producing manuals and large reports, books and monographs (excluding routine progress and technical reports);

e. Programs that are geographically inaccessible to normal administrative services, such as sea-going research vessels, radio astronomy projects, and other research field sites that are remote from the campus;

f. Individual programs requiring specific database management; individualized graphics or manuscript preparation; human or animal protocol; and multiple program-related investigator coordination and communications.

These examples are not exhaustive, and are not intended to imply that direct charging of administrative or clerical salaries/supplies will always be appropriate for the situations illustrated in the examples. When direct charges for administrative and clerical salaries/supplies are made, care must be exercised to
assure that costs incurred for the same purpose in like circumstances are consistently treated as direct costs for all activities.

2. **Examples of Administrative Costs That May Be Direct Charged**

Below is a list of costs that are normally considered F&A costs. For each cost, there is an explanation of when it may be allowable to direct charge these costs. If these costs are direct charged, the costs must meet the conditions stated in the policy (Section E Policy Statement). In addition, guidelines for other expenditures are listed in Exhibit E, Quick Reference for Sponsored Projects Expenditures.

a. **Memberships**

Costs incurred for memberships in technical and professional organizations are treated as F&A costs. This does not refer to costs for attending a conference associated with a membership organization. There may be exceptional circumstances in which membership fees may be directly charged to federally sponsored awards.

<table>
<thead>
<tr>
<th>Examples of when direct charging may be appropriate</th>
<th>Example of when direct charging may not be appropriate</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Membership fees required to attend a conference, where the conference is directly related to the sponsored project. For example, a project requires the PI to present results at a conference and the conference requires participants to be members of the technical/professional organization sponsoring the event.</td>
<td>a. Membership in a technical organization that is renewed every year for the PI and is used by the PI to be kept current on issues and develop a network with other PIs in the area of study. The subscription benefits multiple projects and possibly instruction.</td>
</tr>
<tr>
<td>b. Membership fee required in order to subscribe to a journal, where the subscription is necessary for the sponsored project.</td>
<td></td>
</tr>
</tbody>
</table>
b. **Office Supplies**

Normal administrative unit office supplies are treated as F&A costs.

<table>
<thead>
<tr>
<th>Examples of when direct charging may be appropriate</th>
<th>Examples of when direct charging may not be appropriate</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. “Office” supplies to be used in the field or the laboratory for recording research data, storing research data, or other activities directly related to the technical (rather than administrative) aspects of the project. Supplies used for technical purposes are not “office” supplies -- they are “research” supplies. Such items must be consumed during the course of the project and must be demonstrated to be used only in the conduct of that sponsored project and not used for other projects or for the multiple activities of project personnel. The supplies must be stored separately from the normal administrative unit office supplies. The account code, Office Supplies - Technical (480118) should be used for these supplies.</td>
<td>a. Supplies (e.g. paper, pens, notebook, folders, calculator, etc.) needed for the monthly monitoring of financial activity for a typical R01.</td>
</tr>
<tr>
<td>b. Office supplies needed for administrative processes on a sponsored project that requires more than the routine level of administration (see Section III.C.2 and C.3). The account code, Office Supplies (480101), should be used for these supplies.</td>
<td>b. Supplies (e.g. envelopes, stationary, etc.) used for the preparation of a Financial Status Report or proposal.</td>
</tr>
</tbody>
</table>

Note: Examples of what appears to constitute office supplies and may be appropriate to code as Office Supplies – Technical include: copy paper, diskettes, envelopes, file folders and labels, letterhead, paper clips, pencils, pens, erasers, post-its, push pins, rubber bands, rulers, scissors, spiral notebooks, staplers, staples, staple pullers, tape (scotch, masking, etc.), tapes for tape drive backup. (This list is not intended to be all-inclusive.)
### Postage or Delivery

Ordinary and routine postage is normally treated as an F&A cost.

<table>
<thead>
<tr>
<th>Examples of when direct charging may be appropriate</th>
<th>Examples of when direct charging may not be appropriate</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Postage required for the technical conduct of the study. Examples of this could include:</td>
<td>a. Postage to mail proposal.</td>
</tr>
<tr>
<td>i. Mailing study surveys.</td>
<td>b. Postage to mail routine reports required by the sponsor, such as progress reports, proposals, etc.</td>
</tr>
<tr>
<td>ii. Mailing study specimens.</td>
<td></td>
</tr>
<tr>
<td>iii. Mailing study prescriptions.</td>
<td></td>
</tr>
<tr>
<td>iv. Specialized reports required by the sponsor. This does not include routine reports, such as proposals or other routine correspondence with the sponsor.</td>
<td></td>
</tr>
<tr>
<td>v. Correspondence with collaborators that is required for the technical aspect of the project.</td>
<td></td>
</tr>
<tr>
<td>vi. Mailing reprints when directly related to a project.</td>
<td></td>
</tr>
<tr>
<td>b. Postage needed for administrative processes on a sponsored project that is considered a “major” project requiring more than the routine level of administration (see Section A above).</td>
<td></td>
</tr>
</tbody>
</table>

**Note:** Documentation of postage/delivery is required and includes:

- Copy of Mail Center Postage Meter Charge form from Mailing Services with reason for postage documented on the form.

- Postage meter or log documenting usage for the project.
• Express mail receipt with reason for shipment documented on the form.

d. Telephone

Costs incurred for local telephone services are normally treated as F&A costs. Under exceptional circumstances, local telephone expenses may be directly charged to a sponsored project. Exceptions apply when a project has a special or unique need for telephone communication. Phone usage must be significantly greater than the routine level required by administrative unit usage.

Long distance toll charges, pagers, cellular phones as well as moves, adds, or changes to telephone equipment may be charged directly to federally sponsored projects when a charge can be specifically identified to a project.

<table>
<thead>
<tr>
<th>Examples of when direct charging may be appropriate</th>
<th>Examples of when direct charging may not be appropriate</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Dedicated line used to conduct a telephone survey.</td>
<td>a. Telephones used by the PIs for all activities and maintained after a project ends.</td>
</tr>
<tr>
<td>b. Phone line used exclusively to manage a multi-site research project.</td>
<td></td>
</tr>
<tr>
<td>c. Toll-free (i.e., 1-800) line for study participants to contact researchers regarding a study.</td>
<td></td>
</tr>
<tr>
<td>d. Voice mail for study participants to leave confidential messages.</td>
<td></td>
</tr>
<tr>
<td>e. Off-site locations.</td>
<td></td>
</tr>
</tbody>
</table>

e. Clerical and Administrative Salaries and Wages

Clerical and administrative salaries and wages are normally treated as F&A costs. It would not be expected that department administrators and division administrators, because of the nature of their jobs, would be direct charged to Federally sponsored projects where UCD is the prime award recipient or a sub recipient of Federal flow-thru monies such as a sub agreement. This limitation would be especially applicable to departments and divisions that
are predominately clinical (e.g., divisions in the Department of Medicine) or instruction. Because of the way the UCD effort reporting system is structured, administrative or clerical salary charges of less than 5% are not expected to be made to Federally sponsored projects. Thus, charges of less than 5% per calendar year quarter (e.g., July through September) would not be appropriate.

In limited circumstances, some divisions that are predominately devoted to research (75% or more) may be able to justify some direct charging. Individuals whose salaries are paid from a sponsored project must have responsibilities specifically associated with the work of the sponsored project and must be able to certify this association on the UCD’s Personnel Effort Reporting System. The "specific association" requirement may be satisfied in one of two ways:

i. Unusually high levels of administrative activity associated with unusually large and complex projects such as program projects, cooperative agreements, coordinating centers, multi-center grants, or operations office.

ii. Administrative work that is specifically related to the distinctive scientific and technical requirements of the work of the sponsored project, such as data collection, maintaining subject/patient data, phone surveys, etc.

### Examples of when direct charging may be appropriate

<table>
<thead>
<tr>
<th>Examples of when direct charging may be appropriate</th>
<th>Examples of when direct charging may not be appropriate</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Grants administrative support staff performing extraordinary and extensive administrative support for complex projects as described in Sections A above.</td>
<td>a. Administrative unit staff salaries for staff that provide clerical and administrative support for many functions and areas.</td>
</tr>
<tr>
<td>c. Extraordinary and extensive data entry.</td>
<td>c. Filing of departmental documentation.</td>
</tr>
<tr>
<td>e. Research data cleaning.</td>
<td>e. Routine travel related</td>
</tr>
<tr>
<td>f. Laboratory technician activities.</td>
<td></td>
</tr>
<tr>
<td>g. Conducting computer research work.</td>
<td></td>
</tr>
</tbody>
</table>
h. Telephone surveys.
i. Computer programming for study.
j. Extraordinary and greater than the routine budget creation and maintenance.
k. Extraordinary effort in grant related transcription.
l. Preparing manuscripts for publication.
m. Developing materials for presentations.
n. Large conference planning and organization.
o. Research training.
p. Clinical and patient activities such as scheduling patient visits, interviewing, processing payments for patients, physical exams, blood drawing, height and weight measurement, and extraordinary effort in formalizing physician reports.
q. Database maintenance.
r. Preparing paperwork related to IRB continuing protocol review.
s. Library searches.
t. Preparing progress reports.
u. Tabulate research results.

Note: Project clerical duties performed by Professional Research Assistants or Research Associates that are no more than 25 percent of their duties per the UCD Administrative Policy 5-8, Research Associates Series, are allowable on a grant if the duties are directly related to the project being charged (checklist is not required).
Exhibit D - Faculty and Other Salary Expenses

Faculty salaries and wages paid at the University of Colorado Denver's (UCD) approved rates are allowable costs to federal projects if they reflect the level of effort expended on the project, are documented by the UCD electronic Personnel Effort Reporting System, and do not exceed thresholds applied by Sponsors (e.g., NIH salary cap). Proportional fringe benefits in accordance with established UCD policies are allowable.

1. Personnel Effort Reporting

General

In describing how to best track effort on federal projects, OMB A-21 states the following: "In the use of any methods for apportioning salaries, it is recognized that, in an academic setting, teaching, research, service, and administration are often inextricably intermingled. A precise assessment of factors that contribute to costs is not always feasible, nor is it expected. Reliance, therefore, is placed on estimates in which a degree of tolerance is appropriate."

electronic Personnel Effort Reporting System

UCD uses an electronic Personnel Effort Reporting System as its method of documenting Administrative and Faculty effort performed on Federal Projects. In regard to a Personnel Effort Reporting System, OMB A-21 stipulates the following requirements:

a. “Activity reports will reflect the distribution of activity expended by employees covered by the system.”

b. “These reports will reflect an after-the-fact reporting of the percentage distribution of activity of employees. Charges may be made initially on the basis of estimates made before the services are performed, provided that such charges are promptly adjusted if significant differences are indicated by activity records.”

c. “Reports will reasonably reflect the activities for which employees are compensated by the institution. To confirm that the distribution of activity represents a reasonable estimate of the work performed by the employee during the period, the reports will be signed by the employee, PI, or
responsible official(s) using suitable means of verification that the work was performed.”

d. “The system will reflect activity applicable to each sponsored agreement and to each category needed to identify F&A costs and the functions to which they are allocable.”

2. electronic Personnel Effort Reporting (ePER) Process

UCD has various policies governing employment and payment of employees. Human Resources policies can be found on the UCD Policies and Guidelines page, or by clicking here.

The ePER system serves the following purposes:

- Certification that salaries have been charged to programs/projects in accordance with the relative activity applied to various programs and projects.
- Establishment of the basis for reimbursement to UCD by the federal government for salaries paid from sponsored research, sponsored instruction, and other sponsored activities.
- Provides the basis for certain costs that are reimbursed as F&A costs.
- Serving as a means of identifying cost sharing activity on sponsored projects.

The ePER information reported for the semester (fall, spring, and summer) reflects the actual effort of each employee, as well as it can be reasonably estimated or measured. Semester certification reports are prepared for employees who are paid at least partially from a sponsored project or have committed cost sharing on a sponsored project. Each ePER shows, for the semester, the amount and percentage of salary paid and charged to each project as well as other institutional funds.

ePERs must be completed and certified within 120 calendar days from ePER creation.

The report does not include student hourly work. This includes the following job code series:

- 4100  Student Worker
- 4200  Off Campus Work Study
- 4300  High School, Trade, Other
The hourly students must complete a work record that includes the speedtypes that paid for the work and certification of the work and pay distribution.

The work record can be found at the following link:

https://www.cusys.edu/pbs/forms/downloads/EWR_BiWeekly_Ex ample.xls

Note: Students paid as Graduate Students must complete an ePER for their pay and effort on sponsored projects.

See Exhibit E, *ePER Instructions and Information for Completing the electronic Personnel Effort Report (ePER)*, for guidance.
Instructions and Information for completing the
electronic Personnel Effort Report (ePER)
University of Colorado Denver

1. Accessing an ePER

An e-mail will be sent indicating that the latest electronic Personnel Effort Report (ePER) is available for certification:

To access an ePER, log onto http://my.cu.edu and go to the “my.Tools” tab and then the “ePER Channel”.

[Image of website interface]
2. The ePER Screen

The ePER Screen

The first four columns at the top left provide information about the project including:

- Speedtype: the 8-digit number assigned by the financial system to the project
- Project Number: the 7-digit number assigned to the project
- Sponsor ID: the name of the Sponsor for the project
- Project Description: a short description of the project

Payroll and Cost Sharing/NIH Salary Cap (green)
These two columns display the payroll information already in the system and are not editable.

Effort Information (purple)
Actual Effort % is where actual effort is reported. The top two boxes are editable and the bottom two boxes will calculate the totals. The totals MUST equal 100% or the report will not be able to be certified.

Certification (blue)
Clicking the “Certify” button at the lower left electronically certifies the ePER. The button will be shaded until effort (in the effort columns) equals 100%.
3. Reporting Effort

The first two columns of the payroll section show how pay is currently distributed in the system. Make sure these amounts are correct and that funding for the position is from the appropriate source.

**Payroll Distribution %** shows the percent of total salary (by position) paid on each project. For example, a PI who is paid $50,000 a semester with $25,000 from a project would result in a Payroll Distribution % of 50%.

**Pay with Cost Share Effort/NIH Cap** shows the Payroll Distribution % (previous column) plus any percent of effort committed to the project but paid by University funds. Any percent of salary over the NIH salary cap is reflected in this column.

**If cost sharing effort is mandatory or voluntary committed** it will appear in the column “Pay with Cost Share/NIH Cap Effort” section. You must spend at least that much effort on your project plus any percentage of salary that is paid on the sponsored project.

**Note:** If mandatory or voluntary committed cost sharing is not required but more effort is spent on the project relative to the salary percentage paid by the project, this additional effort can be reported in the Actual Effort % column. This is considered voluntary uncommitted cost sharing.
**Actual Effort %** is the actual effort expended on sponsored project(s) and Other Institutional activities (under the Other Institutional Support line).

**Estimating Actual Effort.** Estimate the average weekly hours spent on a project \(x\), then estimate the average total hours spent on working at CU throughout the entire semester \(y\). Calculate the % of hours worked on the project as compared to the total hours worked \(x/y\). Enter the amount in the “Actual Effort %” column. Enter whole numbers – decimals or % sign is not required.

Your time for instruction, service, department administration, department research and clinical duties paid through UPI should be entered as effort for the “Other Institutional Support”.

For VA appointments paid through the VA, these hours are not considered part of your University appointment and should not be included in the Personnel Effort Report.

---

1 Other Institutional Support does not include effort associated with non-university appointments such as VA appointments. If effort is as cost sharing on a project, the effort should be included in the Sponsored Projects section above for the applicable project.
4. Certify the ePER

After the actual effort has been entered, the ePER must be certified. The percentages must total 100%.

If you are on a half or quarter time appointment at CU, your percentage will still show as 100%, because CU is paying 100% of your 50% or 25% time appointment.

For additional information on ePER completion, please refer to the Step-by-Step Guide: Certifying Electronic Personnel Effort Reports (ePERs) located at https://www.cu.edu/controller/documents/Certifying_Effort_in_ePER.pdf.