UTDBP3106 - Sponsored Projects Compensation Confirmation

Policy Statement

Purpose

This policy establishes The University of Texas at Dallas (UT Dallas) institutional guidelines for Compensation Confirmation. The policy complies with the requirements of the Office of Management and Budget (OMB) 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards Section 200.430 Compensation - personal services.

Policy

The Office of Management and Budget ("OMB") 2 CFR 200 Uniform Administration Requirements, Cost Principles and Audit Requirements for Federal Awards (Uniform Guidance) sets forth the cost principles that institutions of higher education must follow in expenditures of federally sponsored program funds.

OMB 2 CFR Section 200.430 stipulates charges must be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated" and "reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities".

All Principal Investigators and Co-principal investigators who are involved in proposing, expending, and managing sponsored projects must ensure that the salary and wages charged to the sponsored project comply with all applicable sponsor policies and university policies and procedures.

UT Dallas has established a Compensation Confirmation process, which conforms to the compensation requirement of the OMB Uniform Guidance and this document outlines the policy used at UT Dallas to comply with these federal regulations.

Definitions

Co-Principal Investigator (Co-PI) - Co-PIs are key personnel who have responsibilities similar to that of a PI on research projects. While the PI has ultimate responsibility for the conduct of a research project, the Co-PI is also obligated to ensure the project is conducted in compliance with applicable laws and regulations and institutional policy governing the conduct of sponsored research.

Cost Share - The portion of total project costs paid from sources other than the sponsoring agency. Committed cost share can be mandatory or voluntary.

- Mandatory cost sharing is required as a statutory condition of the award, the sponsor's program requirements, or the sponsor's solicitation.
- Voluntary committed cost share is cost sharing that is not required by the sponsor as a condition of the award but that is committed to the sponsor in the award proposal, narrative, budget, or budget justification.

Departmental Administrator - An individual appointed by the department to collaborate with the PI and/or Co-PI and serve as a liaison with Human Resources and Payroll for the duration of the project.

Principal Investigator (PI) - The primary individual responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, training or public service project, contract, or other sponsored project in
compliance with applicable laws and regulations and institutional policy governing the conduct of sponsored research.

*Project* - A research grant, cooperative agreement, training or public service project, contract, or other sponsored project funded by the federal government and administered through the Office of Research.

*Project Anniversary Date* - One calendar year from the start date of the Project.

*Project End Date* – Date on which the Project is ended and no further expenditures are allowed.

*Reasonable* - A cost is **reasonable** if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

*Sponsored Projects Compensation Document* (SPCCD) - The document distributed to the PI either at the Project Anniversary Date or the Project End Date, to confirm: a) all individuals listed worked on the Project; and b) the salary and wage expenditures charged to the Project are accurate and reasonable in relation to the work performed.

**Roles and Responsibilities**

*Office of Research* - Generate and distribute the SPCCD within 45 days of the Project Anniversary Date or Project End Date. Maintain all SPCCD records for auditing and record retention purposes.

*PI or Co-PI* - Confirm and certify that to the best of their knowledge and belief the PPCD accurately reflects the work performed on the Project and that this work was appropriate to the goals of the Project. The PI or Co-PI will return the SPCCD to Office of Research within 45 days of distribution.

**Related Statutes, Policies, Requirements or Standards**

- OMB 2 CFR 200 - Uniform Guidance
- NIH Grants Policy Statement on Salary Limitations
- National Science Foundation Proposal and Award Policies and Procedures Guide

**Policy History**

- Issued: 2016-12-07

**Policy Links**

- Permalink for this policy: http://policy.utdallas.edu/utdbp3106
- Link to PDF version: http://policy.utdallas.edu/pdf/utdbp3106
- Link to printable version: http://policy.utdallas.edu/print/utdbp3106