Session Question #1:
Does the rule on notifying the sponsor if a change in effort of 25% or greater occurs apply to just the PI, or does it extend to any Co-PIs and key personnel?

Answer:
Generally, sponsors will require approval if a PI reduces effort by more than 25% of the level that was approved at the time of award. In addition, sponsor approval is generally required if a PI wishes to replace someone named as key personnel in the proposal or award document. Some sponsors extend that expectation to other key personnel. For specific guidance, refer to sponsor policies or contact SPA.

For federal awards, the rules in OMB Circular A-110, Section C25 apply unless the agency has a more specific requirement.

OMB Circular A-110 requires prior approval for a 25% reduction in the time devoted to a project by the approved project director, or principal investigator, and approval for the change in a key person specified in the application or award document.

NIH stipulates that prior approval is required for a reduction in effort of 25% or more for anyone specifically named in the Notice of Award. While this generally is only the Principal Investigator/Project Director, on certain types of projects, other key personnel may also be named. See NIH requirements for “key personnel” at: [http://grants.nih.gov/grants/policy/nihgps_2003/NIHGPS_Part7.htm#_Toc54600127](http://grants.nih.gov/grants/policy/nihgps_2003/NIHGPS_Part7.htm#_Toc54600127)

NSF extends this requirement to anyone named as Principal Investigator or Co-Principal Investigator on their Award Notice. With NSF, the expectation is that their program officer will be consulted and a determination made whether the reduction will negatively impact the project. This consultation can be done via FastLane’s “Notifications and Requests” module. The NSF Grants Award and Administration Guide is at: [http://www.nsf.gov/pubs/policydocs/pappguide/nsf08_1/aag_index.jsp#top](http://www.nsf.gov/pubs/policydocs/pappguide/nsf08_1/aag_index.jsp#top)

Session Question #2:
A PI on a University project has left the University to work at another institution, but the project remained at the University and s/he still oversees it but does not charge salary to the project. What responsibility does the University have for documenting the effort for someone no longer at the University but still responsible for the project?

In general when a PI leaves the University, the Sponsor will require that the University either propose an acceptable substitution of a new PI, who will be on-site, or the University may agree to relinquish the award and allow it to be transferred to the PI’s new institution.

In the case where a substitute PI has been named, the original PI may still be associated with the project as a key person. If some portion of the project will be moved to the original PI’s new institution, this is usually accomplished via a subaward from the
University of Minnesota to the new institution. Generally, this mechanism is appropriate when the work to be done requires the facilities and personnel of the other institution. This includes our original PI when he/she is devoting effort as a part of his or her appointment at the new institution. If the work that our original PI needs to do does not require the facilities or other personnel at the new institution, and will not be done within the parameters of his/her employment at the new institution, it may be appropriate to hire the PI as a consultant. PIs are advised in this case to review the consulting policy at their new institution to ensure that the time to be devoted is within the allowed levels of consulting time. In this case, the University of Minnesota must document the effort of our former PI via our procedure entitled: “Documenting Effort Outside of ECRT” which can be found at: http://process.umn.edu/groups/ppd/documents/Procedure/Outside_ECRT.cfm