

October 24, 2013

R-1314-18

CHANCELLORS

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Acting President

Guidelines to Assure the Continuity of Established Compliant Practices in Effort Reporting

The University of Puerto Rico (UPR) has the responsibility of complying with the preparation and submission of compliant time and effort reports, according to Circular OMB A-21. Accordingly, during the past two years a significant enhancement of the University's Effort Reporting System (ERS) has been achieved, leading to the implementation of an OMB A-21 (2CFR220) compliant system. The UPR has a firm and unequivocal commitment with NSF and all federal agencies towards a full compliance and transparency culture. Therefore, the following guidelines are being established and disseminated system-wide to provide NSF and all federal agencies firm and resolute assurances on the continuity of established compliant University practices.

1. All proposals submitted to federal and non-federal sponsors **MUST INCLUDE** and appropriately justify in their budget section any request for additional compensation(s).
2. All University proposals submitted to federal and non-federal sponsors requesting additional compensations, **MUST INCLUDE** the following statement in their corresponding budget summaries or justifications:

"All salaries requested are calculated according to Federal and UPR regulations applicable to the institutional base salary. In the case of _____ (name(s), position), payment of additional compensation(s) is (are) requested, since the following _____ activities will be performed outside departmental lines and in addition to regular workload. Therefore, this personnel will be compensated above the institutional base salary according to OMB A-21, section J.10.d (1)."

3. Billing or charging of costs to a federal award or agency **MUST BE DONE AFTER COMPLETION** of 125A Forms.
4. Institutional Incentive remunerations, received in conformity with Circular R-1112-21, are paid **ONLY** from institutional funds.

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October 24, 2013

Page 2

R-1314-18

5. The UPR **WILL NOT** charge Institutional Incentive payments to the federal government, neither directly, nor through the calculation of its facilities and administrative costs (F/A) or fringe benefits rates.

The University underscores that the above first and second specific guidelines and assurances further strengthen previously adopted policies on incidental work/additional compensations, as documented in President's Circulars: (1) R 1213-05 (September 10, 2012) Incidental Expenses Requiring Prior Authorization by External Agencies Sponsoring Projects or Programs at the University of Puerto Rico; and, (2) R-1213-4A (May 14, 2013) Incidental Payments and Additional Compensations. Among other aspects, both of the above circulars emphasize the need of prior approval by the awarding agency, for any additional compensation requests.

JLD