

University of Texas at Austin — Request for Effort Certification Proxy — PI Initiated

1. Principal Investigator information: Name: \_\_\_\_\_ EID: \_\_\_\_\_
2. Proxy information: Name: \_\_\_\_\_ EID: \_\_\_\_\_

3. Please provide the following information about each project for which certification authority is to be proxied; list additional projects on an attachment if more room is needed:

Project Budget Group 26-xxxx-xx	Project Title	Sponsor	Proxy Begin and End Dates Only provide if different than the period of performance. mm/dd/yyyy	
26-				

4. Provide a brief explanation of why a certification by proxy is being requested for the projects listed. Refer to UT Austin Policy section I part E and page 2 of this form. <http://www.utexas.edu/policies/hoppm/11.B.04.html>

Check one. Proxy is: Co-Investigator overseeing the work      Project Director overseeing the work      Another Comparable Individual **Requires Explanation Below**



5. Name of person submitting this form: \_\_\_\_\_ Date: \_\_\_\_\_

**Signatures** “Direct Knowledge” & “Suitable Means” [http://www.whitehouse.gov/omb/circulars\\_a021\\_2004/](http://www.whitehouse.gov/omb/circulars_a021_2004/)

Principal Investigator: “I certify that the Proxy named above has direct knowledge and a suitable means of verifying the work performed on the projects listed. I understand that I remain ultimately responsible for the accuracy of the effort certifications. I have read and understand the guidance on page 2 of this form.”

Proxy: “I certify that I have read and understand the guidance on page 2 of this form, that I understand the role of proxy being entrusted to me, and that I have direct knowledge and a suitable means of verifying the work performed by all individuals employed on the projects listed and of affirming that the wages charged to the sponsor are reasonable in relation to the work”.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Reviewed and Approved by OSP: \_\_\_\_\_ Date: \_\_\_\_\_

## Proxy Applicant Guidance

Review of a request for proxy is based upon the merit of the explanation provided on page 1 of this form. The primary responsibility for certification rests solely with the Principal Investigator. Therefore, a request for proxy should be an exception. Designation of a proxy does not relieve the Principal Investigator of the primary responsibility for accuracy of certification, but rather it allows another appropriate individual who meets the criteria required to serve as proxy to perform certification. The designation of a proxy is not intended to be an assignment for administrative convenience. Rather it is intended to ensure that the single best-suited individual in a position to certify to the effort of individuals is identified and authorized.

**Proxy definition:** For effort certification, a Proxy is defined as an Individual with comparable responsibilities on a sponsored project application to a principal investigator, project director, co-investigator, or co-project director who certifies effort by virtue of having direct knowledge of the work and using suitable means of verification that the work was performed.

**Examples:** A primary individual who is either a tenure-track or non-tenure-track faculty member who works on the project in a position such as co-investigator; a laboratory manager or scientist who observes and/or participates in the research on a continual basis.

**Non-examples:** An administrator not engaged in work on the sponsored project; an administrator who processes appointments and other costing transactions for the project, but does not witness first-hand the actual on-going research or work on the sponsored project; a student.

**Note:** Criminal charges may be brought against an individual who certifies a falsified effort report, per [UTS 163](#). Proxy certification is an audit risk.

### Criteria Reviewed Include:

- \* Appointment of the individual agreeing to serve as proxy
- \* Reasonableness that the individual will have access to direct and verifiable knowledge of the work performed by employees on the sponsored project considering proximity of location
- \* Quantity of active projects on which the employee has already agreed to serve as proxy

### Regulation and Policy

Federal regulation in OMB A-21 states, "At least annually a statement will be signed by the employee, principal investigator, or responsible official(s) using suitable means of verification that the work was performed, stating that salaries and wages charged to sponsored agreements as direct charges, and to residual, F&A cost or other categories are reasonable in relation to work performed." It also requires, "the signature of the employee or of a person having direct knowledge of the work." See A-21 section J.10.b.2—c.3.e.2.

UT Austin Policy states, "The PI can authorize Individuals who have direct knowledge of work performed to certify or precertify Effort on the project ... the PI remains ultimately responsible for the accuracy of the certification."

UT System Policy states, "A Primary Individual is a person listed as principal investigator, project director, co-investigator, co-project director, or those with comparable responsibilities on a sponsored project application. A Primary Individual typically, but not always, carries an academic (i.e. faculty) appointment ... A requirement for a Primary Individual to certify Effort Certification reports for all Supporting Individuals who have expended Effort on his/her Sponsored Programs; A requirement for a Primary Individual to certify his/her own Effort Certification report."