

## **CSP-6-04 Effort Reporting: Certifying Effort on Sponsored Projects**

### **CSP-6-04.01 Scope**

Institutional policy at The University of Akron (The University) assigns responsibility for management of sponsored program accounting and reporting to the Office of the Controller. In order to fulfill this obligation, this document is designed to outline the Office of the Controller's procedures for administering the certification of effort expended on sponsored project awards administered by The University. It applies to all individuals whose salaries are charged or cost-shared to sponsored projects, in whole or in part, and to all individuals involved in certifying the effort of other individuals.

### **CSP-6-04.02 Purpose**

The purpose of these procedures is to ensure that effort certifications completed in connection with university sponsored projects are accurate, reasonably reflect the actual level of effort expended on a sponsored project, and comply with sponsor requirements.

As a condition of receiving sponsored awards, The University must assure sponsors that the effort expended on their sponsored projects justifies the salary charged to those projects. In addition, The University must assure sponsors that the commitment indicated (including mandatory and voluntary committed cost sharing) in the proposal and subsequent award is met in accordance with the sponsor's terms and conditions. The University provides this assurance by requiring periodic effort reports for each individual whose salary is charged to one or more sponsored projects and/or cost sharing account during the effort reporting period. These effort reports indicate the percentages of the individual's total effort that are dedicated to the sponsored project(s) and other university activities, and require a certification that the reported effort percentages are accurate.

Each faculty member must be aware of his/her level of committed effort to sponsored projects and their ability to meet those commitments in light of any other university obligations they may have. Faculty are expected to communicate any significant changes in level of sponsored projects effort to his/her effort coordinator.

Externally imposed financial penalties, expenditure disallowances, and grant/project terminations could result from failure to provide accurate effort certifications or to comply with The University's effort reporting requirements. All individuals involved in the effort certification process are expected to abide by the provisions of the University policy and these corresponding procedures.

### **CSP-6-04.03 Guiding Principles**

- The University is committed to ensuring that effort reports made in connection with sponsored projects are accurate.
- All faculty and staff who are involved in allocating salaries and wages to sponsored projects, managing sponsored projects, or completing effort reports are responsible for understanding the principles of accurate and timely effort reporting.
- In no case can the percentage of an individual's salary charged to a sponsored project exceed the percentage of the individual's total effort that is expended on the project during an effort reporting period.
- If the percentage of total effort expended in a given effort reporting period is less than the percentage of salary charged to the sponsored project during the period, the salary charges must be reduced to reflect actual effort.

### **CSP-6-04.04 Definitions**

#### **Effort**

University policy defines effort as the proportion of time devoted to sponsored projects, teaching, clinical practice, and other activities, expressed as a percentage of total university activity, or 100% effort. The denominator of the effort percentage must always be total university effort, irrespective of the total number of hours worked during the effort reporting period. A working definition of effort is the time spent on any activity by an individual, expressed as a percentage of the activity encompassed by the individual's Institutional Base Salary (see below).

## Institutional Base Salary

Total Institutional Base Salary (IBS) is the professional activity for which an individual is compensated by The University. Although the scope of total IBS may differ somewhat among faculty, the following table illustrates the kinds of activities that would typically be considered to be part of the total IBS of a faculty member:

Activities or pay sources included in IBS:	Activities or pay sources excluded from IBS:
<ul style="list-style-type: none"> <li>Externally sponsored grants, contracts and cooperative agreements, and activities specifically related to ongoing research projects such as attending meetings and conferences, and mentoring and advising undergraduate and graduate students. Includes Speedtypes in the 5xxxxx series (sponsored program accounts) and the 2xxxxx series (UA cost sharing accounts).</li> <li>Departmental or university funded research through assigned time</li> <li>Academic instruction, including classroom teaching, mentoring and advising undergraduate and graduate students, laboratory instruction, curriculum development and maintenance, overseeing independent studies, lab course sections and field experiences.</li> <li>Administrative and service activities for the department/college/university.</li> </ul>	<ul style="list-style-type: none"> <li>Stipends</li> <li>Overload pay for faculty whose semester instruction load is greater than the basic university requirements.</li> <li>Bonus pay</li> <li>Award honoraria</li> </ul>

## Effort Reporting

Effort reporting is the process by which The University documents the effort expended on sponsored projects during each effort reporting period. The effort report form documents the proportion of time devoted to sponsored projects, teaching and other activities, expressed as a percentage of total university effort. The denominator of the effort percentage must always be total university effort, irrespective of the total number of hours worked during the effort reporting period. For example, if a faculty member works an average of 50 hours per week during an effort reporting period and works an average of 10 hours per week on a particular sponsored project, the correct effort percentage for that project would be 20%.

## Payroll or Salary Allocation

Payroll or salary allocation is the process of assigning salary charges to sponsored projects and other university activities. Payroll allocations and effort allocations are not equivalent, although the end result should be that the two are aligned. For example, if a payroll allocation to a sponsored project during an effort reporting period exceeds the percentage of effort actually expended on the project during the period, the payroll allocation must be reduced accordingly. No payroll allocation can exceed that which is included in the budget of the funded project.

## **Effort Certification**

Effort certification is the affirmation by the individual completing each effort report form that the percentages of effort reported on the form are accurate. Knowingly signing an inaccurate effort certification is a violation of university policy, as well as potentially a violation of civil and criminal statutes.

## **Effort Coordinator**

An effort coordinator is an individual whose role is to manage the effort reporting process and provide support to faculty and staff in their department/college. Effort coordinators review the effort reporting and accounting systems on a regular basis to ensure faculty and staff's salaries are being correctly charged to sponsored and non-sponsored project accounts. They work with Grant Accounting to manage any cost transfers that need to occur regarding adjustments to salary allocation or cost sharing and they work with faculty and staff in their department to verify and explain the information displayed on their effort report.

## **Certifier**

A certifier is any member of the faculty at The University who has been awarded or holds an appointment that would allow them to act as a Principal Investigator (PI) on a grant, subcontract or other sponsored program agreement. Certifiers will always certify their own effort report form even if they are paid in part by one or more sponsored accounts for which another faculty member is the awarded PI.

## **Period of Performance**

At The University, a Period of Performance, as it relates to effort reporting, is defined as one academic semester, of which there are three during the calendar year: fall, spring and summer. One effort report is generated per each period of performance.

### **CSP-6-04.05 Proposing Effort and Requesting Salary Support**

Levels of effort proposed in any sponsored project application should be consistent with the actual effort that each individual is expected to expend on the project during the relevant project period(s). The amount of salary support requested should be determined based on the individual's academic year salary and the requirements/limitations of the sponsor.

Sponsors generally consider estimates of effort (and corresponding salary requests) in project proposals to be commitments if such proposals are subsequently awarded. Principal Investigators (PIs) and other key personnel for whom such commitments have been made are responsible for ensuring that the commitments are met. The effort levels reported in effort reports can be a source of information on that subject, but ultimately the responsibility for meeting the commitments lies with the individual.

### **CSP-6-04.06 Establishment of Salaries on Sponsored Project Accounts**

Salary distribution consistent with the projected effort should begin on sponsored projects accounts concurrently with actual project effort. Salary need not be charged to the project if cost sharing is documented. It is each faculty member's responsibility to be aware of his/her level of effort and to communicate any significant changes in level of effort to his/her effort coordinator to ensure that salary distributions are reviewed and updated, if appropriate, on a timely basis.

## CSP-6-04.07 Completion and Certification of Effort Reports

### How to Complete the Effort Report

On a regular basis (at the end of every semester) an effort report will be generated from The University's effort reporting system for faculty, managerial and professional, clerical and technical staff, graduate students, and post-doctoral associates whose compensation was charged in whole or in part to a sponsored project during the respective effort period. These effort reports must be completed, certified, and submitted in accordance with these procedures. The effort reports will contain data indicating the percentages of the individual's salary that were allocated to sponsored project accounts and other university activities. These salary allocation percentages are not effort percentages; they are provided solely for informational purposes.

Certifiers are expected to review the payroll distribution percentages on the effort report, and determine whether those percentages reasonably correspond to the percentages of the individual's actual effort on each project or activity, recognizing that within an academic setting, teaching, research, service, and administration are often intermingled. If salary percentages reflect the actual effort, the person completing the report (certifier) should certify the effort report.

If the salary allocation percentages on the report do not correspond to the percentages of the individual's actual effort on the listed projects or activities (or other projects or activities that may not be listed), the person completing the report should indicate in the "Actual Effort %" column the actual percentages of effort on each listed project or activity. The person should then certify the effort report. If there is an unlisted project or activity on which effort was expended, the person should contact their effort coordinator to have the activity added to the effort report prior to certifying the report.

When certifying the effort report, the criterion to be used is how the individual's effort was expended for the reporting period. Factors such as the availability of funds should not influence the certification of an effort report. The completed effort report must reflect all activities which are incorporated into IBS at The University of Akron (see definitions in CSP-6-04.04). The total work effort expended cannot be more or less than 100%. Most faculty are engaged in teaching, research and service duties in addition to their work on sponsored projects. If for any reason the person completing the report has questions or concerns about how the report should be completed or certified, s/he should consult their effort coordinator.

### Who May Certify

Each effort report must be certified by a responsible person with suitable means of verifying that the effort indicated was, in fact, expended in the proportions shown. The University's practice is:

- All PIs certify their own effort, regardless of the type of position they hold at The University of Akron.
- PIs will certify for those who report to them and are paid from the grant; including but not limited to graduate students and non-faculty
- All faculty certify their own effort, regardless of if they are the PI on a grant or not.
- All classified staff certify their effort through signing their time cards; they will not certify through the electronic effort system.

When a graduate student or staff member works on multiple sponsored projects for two or more PIs:

- Any of the PIs may certify all of the individual's effort, as long as he or she has suitable means of verifying that the work was performed as allocated.
- Each PI can certify the portion of the individual's effort about which he or she has suitable means of verifying that the work was performed.
- The PIs and the effort coordinators should work together to ensure that all of the individual's effort is certified in a timely manner by one or more responsible people with suitable means of verifying that the work was performed.

### **Certification Delegation**

In some circumstances, the PI may not have suitable means of verifying the effort for sponsored project staff or themselves. For example, this may occur in the case of large center grants, where an individual is the PI by virtue of his or her position at The University. With the web-based effort system (ecrt), The University can authorize an individual to certify the effort reports for project staff instead of the PI. When such an arrangement is needed:

- The PI and the effort coordinator must work together to identify the individual who has suitable means of verifying the effort for the affected staff.
- The effort coordinator must communicate to the Controller's Office the need for the arrangement, and the name of the individual who will certify the effort. This will be done by completing a 'Request to Delegate Effort Certification Authority for ecrt' form.
- The Controller's Office will establish the authorization for the alternate certifier once the form is received, approved and processed.

In an extenuating situation where a PI cannot certify his/her own effort, then it is up to the effort coordinator to work with the Controller's Office to designate a responsible person with suitable means of verifying that the effort indicated was, in fact, expended in the proportions shown. A 'Request to Delegate Effort Certification Authority for ecrt' form must be submitted in such cases.

### **Summer Effort/Salary for Faculty with 9-Month Academic Appointments**

Faculty compensated for 9-month academic appointments are permitted to expend up to an additional fifteen weeks of summer effort on sponsored projects in the period beyond the academic year (i.e., during the summer), subject to university and sponsor policies and the approval of the department chair and dean/provost.

The procedures contained herein relating to the reporting and certification of effort apply fully to the reporting and certification of summer effort. Specifically, charging summer salary to one or more sponsored projects implies that at least a commensurate amount of effort has been expended on those projects during the summer effort period. Faculty who receive summer salary from sponsored projects must certify to the effort expended on those projects during the summer effort period. Effort expended during the academic year cannot be counted for this purpose.

### **Salary Reallocations & Recertification**

Salary reallocations made as a result of the effort certification process must be made in accordance with university policies and procedures on salary reallocations and cost transfers. If it is necessary to adjust the salary charges for a previously certified effort period, documentation must provide a detailed explanation of the need for the adjustment and subsequent recertification by using the 'Cost Transfer Request Form'. This documentation must be completed and submitted to the Controller's Office for approval. If approved, a recertification of the effort period and an appropriate salary reallocation is then performed.