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Effort Reporting Policy

Responsible Office: Office of Contracts and Grants  Effective Date: June 13, 2011

Last Revision: July 25, 2011

Purpose:

Federal regulations applicable to sponsored research at colleges and universities (OMB Circular A-21, Section J.10, "Compensation for Personal Services") require that each institution maintain an acceptable effort reporting system.

The purpose of an effort reporting system is to provide a reasonable basis for distributing salary charges among institutional activities. Since effort reports are the source documents to support salary charges to sponsored projects, it is essential that this data be based on reasonable estimates of actual effort expended on each sponsored project and non-sponsored or University funded accounts.

Effort Reporting Policy:

- The University is committed to accurate and timely effort reporting.
- The effort report must be completed by the individual whose effort is being reported, the Principal Investigator, or by a responsible person using a suitable means of verification that the work was performed.
- The effort report must account for all effort for which the University compensates the individual as a part of his or her Institutional Base Salary (IBS).
- The effort percentages must be based on total effort, not hours and must total 100% effort for the reporting period.
- University compensated effort includes all research, teaching, administration, regular monthly clinical activity, and any other activity for which an individual received compensation from the University. Excluded from effort reporting are Bonuses, Awards, Clinical Variable Pay, and any lump sum payments or compensation received from sources other than the University, such as outside consulting work permitted by the University.
- Effort distributions should be reasonable estimates of activities, recognizing that research, instruction, and clinical activity are often inextricably intertwined and estimates may be necessary.
- Effort and payroll distributions are not the same thing. Payroll distributions are initial estimates of how effort is anticipated to be expended. The effort reporting process is a method for confirming charges made to sponsored awards. Individuals are not always paid from individual sources in direct proportion to the amount of activity provided to support that sponsor or account.
- Mandatory or voluntary committed cost sharing must be reported. Where some or all effort an individual expends on a specific sponsored research project is not compensated by the sponsor but is mandated by the sponsor, or where the individual has clearly committed to uncompensated effort on the project, a separate HR account code will be established to account for the cost share effort. The effort reporting system will include this HR account code and the amount of salary and percentage of effort devoted to the project.
Non-Compliance with the Policy

Providing inaccurate effort estimates on the effort report form, whether knowingly or through carelessness or mismanagement, may result in incorrect charges of costs to the federal government, State of Florida and other sponsors. Each individual with responsibility for effort reporting must thoroughly understand the proper method of completing effort certifications and ensure effort percentages reported reasonably reflect effort expended during the report period.

Failure to follow the effort reporting policy may subject the individual and the department to appropriate administrative and / or disciplinary actions in accordance with University procedures and guidelines.

Certification of effort reports that are known to be materially inaccurate may subject the individuals involved in the inaccurate reporting to appropriate disciplinary actions.

In cases of non-compliance with the effort reporting policy, the University may:

- Remove any salary related costs from the contracts and grants and charge these amounts to departmental funds.
- Suspend or freeze the awards covered by these effort reports until the issues have been resolved.
- Suspend the individual’s ability to submit new proposals or be included as key personnel on other proposal submissions.

Effort Reporting Roles and Responsibilities

The various individuals with responsibilities in University effort certification practices must thoroughly understand the proper method of reviewing, completing and certifying the effort reports to ensure that documented effort percentages reasonably reflect effort expended toward individual sponsored activities and other University activities supported by their institutional based salary during the report period.

Principal Investigators and Faculty are responsible for:

- Understanding the principles, policy and procedures related to accurate and timely certification of effort reports.
- Ensuring that all committed effort obligations are accurately reflected on the effort reports.
- Ensuring that his/her own effort and that of other individuals working on sponsored activities under their direction is certified accurately and in a timely manner.
- Complying with Sponsor requirements regarding any significant reductions (normally ≥25%) in effort commitments on funded sponsored activities.
- Providing timely information to appropriate departmental personnel in regard to the need for payroll distribution changes.
- Meeting the overall commitments to sponsors and ensuring an appropriate level of effort on projects.
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Departmental Support Staff are responsible for:

- Understanding the principles, policy and procedures related to accurate and timely certification of effort reports.
- Assisting with compliance with the effort reporting policies, systems and procedures.
- Providing guidance and assistance to faculty and other certifiers to support the accurate reporting of effort.
- Following up and processing any necessary adjustments and cost transfers to resolve discrepancies between payroll charges and actual effort.
- Communicating with instructor work load coordinators to ensure that information regarding instructor work load and faculty course information is recorded properly.
- Retaining documentation to support the effort reporting process as necessary.
- Managing and processing changes to effort commitments over the reporting terms.
- Helping to monitor and manage cost sharing requirements on projects.

Department Chairs and Deans are responsible for:

- Understanding the principles, policy and procedures related to accurate and timely certification of effort reports.
- Assisting and providing guidance to faculty and other effort certifiers in the accuracy and timeliness of the effort reporting process.
- Ensuring departmental processes and procedures support the effort reporting process.
- Following up and helping resolve departmental issues and take corrective action when necessary.

Division of Sponsored Research (DSR) is responsible for:

- Helping coordinate and develop principles, policies and procedures in support of accurate and timely certification of effort.
- Reviewing and approving requests for reductions of effort as required by sponsors terms and conditions.
- Providing overall commitment information with Notice of Award for key personnel to Contracts and Grants.

Office of Contracts and Grants Accounting Services is responsible for:

- Developing principles, policies and procedures to support accurate and timely certification of effort.
- Maintaining the University effort reporting system and processes including the maintenance of sponsor salary caps.
- Assisting in the resolution of discrepancies / adjustments necessary related to effort.
- Reviewing and monitoring effort reports for compliance with University and sponsor policies.
- Maintaining and monitoring commitments to sponsors within the effort reporting system.
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Department of Cost Analysis (CA) and the Office of Institutional Planning and Research (OIPR) are responsible for:

- Notifying the University community regarding the availability of effort reports (CA).
- Assisting in the resolution of discrepancies/adjustments for instructional activities that are related to effort (OIPR).
- Assisting in the resolution of discrepancies/adjustments for all effort related activities, except instructional, that are related to effort (CA).
- Approving and managing effort reporting proxies (CA).
- Supporting the timely effort certification (CA).

Office of Audit Compliance and Review is responsible for:

- Reviewing the Effort System on a regular basis in compliance with the overall audit plans and guidelines for the University.
- Providing recommendations for system internal control improvements and processes.
- Helping to identify policies / procedure gaps in the effort reporting processes.