# Time and Effort Reporting

#### Policy Owner Provost, Office of Institutional Research

#### **Policy Statement**

The University is committed to ensuring that effort reports completed in connection with sponsored projects are accurate. Effort reports are required when any portion of compensation is paid from a sponsored project or cost-share is committed to a sponsored project. All faculty and staff who are involved in charging 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.

An effort certification should be a reasonable estimate of how time is spent. 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 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 same period, the salary charges must be reduced via the salary redistribution process to reflect the actual effort.

Effort reports are generated for all employees (excluding those required to complete timesheets) with compensation paid from a sponsored project during the reporting period. Principal Investigators, faculty, or a person with first-hand knowledge of individual activities certifies effort reports for individuals whose salaries are charged to sponsored projects. Effort reports are generated and distributed within a reasonable time frame following the close of the reporting cycle. Certification of effort must be completed within three (3) weeks of distribution.

#### Scope

As a recipient of federal funding, Converse University is required to comply with cost accounting requirements contained in 2 CFR 200.430 - Compensation-Personal Services, and Uniform Guidance Subpart E §200.430, for certifying time spent working on sponsored projects. The purpose of this policy is to ensure those effort certifications completed in connection with Converse University sponsored projects are accurate, reasonably reflect the actual level of effort expended on a sponsored project, and comply with sponsor requirements.

### Policy

Converse University periodically certifies effort after the fact, ensuring that charges made to sponsored funds and effort expended are at least equal to the salary paid on sponsored funds. At the end of each reporting period, effort reports are generated via spreadsheets. These effort reports are verified by the business administrator and released to department or University administrators for review.

An effort report is generated only for employees who have received payments from at least one sponsored fund during the reporting period. Any significant differences between the actual effort expended and the salary distribution reported on the effort report must be documented in the notes section of the effort report and reported to the Cost Analysis staff in GCA. In addition, the department or, in some cases, the University research office staff is responsible for initiating payroll redistributions to correct the differences in order to ensure accurate reporting of effort.

For employees only paid from non-sponsored funding to report effort expended on a sponsored project (i.e., cost-share), a request to the Business services staff must be made to generate the necessary effort report(s).

## Failure to Comply

Effort reporting is a high-risk audit item because salary charges to sponsored funds are significant. Financial penalties, expenditure disallowances, and harm to the University's reputation could result from failure to provide accurate effort certifications or failure to comply with the University's effort reporting requirements. Failure to comply with this policy may result in the suspension of proposal submission privileges for the PI, suspension of work on a sponsored project, and/or disallowance of a salary cost and transfer to a departmental fund.

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