

POLICY ON EFFORT CERTIFICATION

Policy #	Origination Date	Responsible Office(s)	Status	Approval Date
	04/11/2016	Office of Research and Sponsored Programs		05/11/2018

Deleted: 04/11/2016

Reason for Policy/Purpose Update

The following information details the University's policy and procedures for maintaining appropriate Time and Effort documentation, as required Uniform Guidance Subpart E 200.430. The revised policy outlines processes for all exempt employees that are either compensated from or have portions or all of their salary charged to sponsored agreements.

Policy Statement

As a recipient of federal funding, Dillard University is required to comply with the Office of Management and Budget Circular Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), as well as other federal requirements for certifying effort expended on sponsored agreements and awards. As such, Dillard University requires all to comply with federal and University policies regarding reporting effort on such awards.

Deleted:

Personnel charges to federal awards should be reflective of effort committed by faculty and staff toward the award(s). Faculty and staff are responsible for ensuring that effort charged to federal agreements are a reasonable representation of the actual effort they provided on the award.

Who Needs to Know This Policy

All faculty and staff with all or a portion of support from federally sponsored agreements, as well as all individuals involved with administration and conduct of federally sponsored award activities, including principal investigators (PI) and other research personnel, and central and departmental budget/program managers. It is the responsibility of the PI or designated department level manager to communicate to the sponsored programs office (ORSP) any change in effort that require sponsor notification and/or approval. The PI is also responsible for ensuring that Effort [Certification](#) Documents for their awards are completed and returned to ORSP.

Formatted: Font:(Default) +Theme Body (Calibri)

Deleted: Cortication

Deleted: within 30 days of being released to them from ORSP.

Definitions

Policy/Procedures/Accountability

Effort Reporting Requirements

As a recipient of federal contract and grant funds, Dillard is responsible for maintaining an effort reporting system in compliance with the requirements of Uniform Guidance. The University must maintain an Effort Reporting System that assures salaries and wages charged to sponsored research awards accurately reflect the time devoted to the project for a specific period. This system must document **all effort, whether treated as direct or F&A, for sponsored agreements.** Exempt employees are responsible for understanding how their salary charges are distributed and should verify there is a reasonably close relationship between salary distribution and the actual effort devoted to the projects being charged.

University Method for Effort Reporting

After The Fact Reporting

Dillard employs the "After the Fact" method. Under this method, the distribution of salaries and wages of staff applicable to sponsored agreements is based on budgeted work activity, updated to reflect any significant changes in work distribution. At least annually, a statement will be signed by the employee, principal investigator, or responsible supervising official(s), using suitable means of verification that the work was performed. Since Effort Certification Documents (ECDs) are the source documents that support salary charges to sponsored projects, it is essential that data are based on reasonable and accurate estimates of actual effort expended on sponsored projects (both as direct and cost-shared or indirect charges) and other effort reporting categories.

Effort Certification System and Procedures

For **faculty** (with 9-month appointments) an Effort Certification Document (ECD) will be required semi-annually encompassing each academic term that involves salary and/or effort on sponsored project(s) and should include the signature of the employee, supervisor and/or principal investigator.

For **exempt staff**, ECDs will be required **quarterly** denoting effort on all sponsored agreements and must include the signature of the employee, applicable supervisor, and the area vice president. Non-exempt employees' effort will be certified within monthly/bi-weekly timesheets or payroll documents.

It is the responsibility of the employee and principal investigator/immediate supervisor to ensure timely submission of time and effort certifications. Timely submission of the certification is essential, in that these certifications must be reconciled with actual salary allocations. Signed ECD's are due to the Office of Research and Sponsored Programs (ORSP) within 15 days after ECDs have been forwarded/released by ORSP or within 15 days after the reporting period, whichever occurs first. They should be complete with all necessary approvals and transmitted electronically to ORSP (See ORSP for detailed procedures and e-routing processes).

For the purpose of the Effort Reporting System, the certification periods and recommended ECD reporting dates are as follows.

Deleted: EFFORT REPORTING REQUIREMENTS .

Formatted: Left

Formatted: Font:Bold

Deleted: .

Deleted: AFTER THE FACT REPORTING .

Formatted: Font:Bold

Deleted: EFFORT CERTIFICATION SYSTEM AND PROCEDURES .

Formatted: Font:Bold

Deleted:

Deleted: .

Deleted: subsequent

Appt. Type	Certification Periods			
9-Month	08/15-12/30		01/01-05/15	
12-Month	07/01-09/30	10/01-12/30	01/01-03/31	04/01-06/30
Non-Exempt	Bi-Weekly timecards, etc.			

Reporting Dates	Oct. 15	Jan. 15 ^h	Mar. 15	May 30	Jul. 15
9-Month Appointments		✓		✓	
12-month Appointments	✓	✓	✓		✓
Non-Exempt/hourly *	-	-	-	-	-

Major Effort Distribution

Federal statute requires that notification is provided to the funding agency when PI effort toward the sponsored project is reduced or changed by 25%. This may be necessitated by involvement in additional awards or University activities. However, the level of total effort reported from all activity should not exceed 100%. All changes must be certified by the employee and someone who has suitable means to verify the effort expended or work performed. In the event that this becomes necessary, PIs should contact the Office of Research and Sponsored Programs prior to contacting the funding agency.

Departure from The Institution

Upon departure from the university, all employees with effort charged to federally sponsored agreements must complete a final Effort Report Document reflective of the efforts during the current reporting period. This certification must be completed during employee's exit / clearance process through Human Resources. The final ECD must be also signed by the PI or immediate supervisor. In the event the ECD cannot be completed prior to the employee's departure the effort must be certified by the PI or immediate supervisor and provide explanation (i.e. illness) for exiting employee not signing.

Website Address(es) for this Policy

www.dillard.edu/orsp

Contact(s)

DU ORSP

- Deleted: MAJOR EFFORT DISTRIBUTION -
- Formatted: Font:(Default) +Theme Body (Calibri)
- Formatted: Font:(Default) +Theme Body (Calibri), Bold
- Formatted: Font:(Default) +Theme Body (Calibri)
- Formatted: Left
- Formatted: Font:(Default) +Theme Body (Calibri), Bold
- Formatted: Font:(Default) +Theme Body (Calibri)

- Deleted: DEPARTURE FROM THE INSTITUTION -
- Formatted: Font:(Default) +Theme Body (Calibri), Bold
- Formatted: Font:(Default) +Theme Body (Calibri)

- Deleted: www.dillardorsp.net

Who Approved this Policy

History/Revision Dates

Origination Date:

Cabinet Approval Date:

Updated:

Revised:

Agreement - Signature

Deleted: Senior Cabinet -