

## BUSINESS POLICY LETTER

2019:04

TO: All Members of the University Community

DATE: October 11, 2018

### **TIME AND EFFORT CERTIFICATION POLICIES AND PROCEDURES**

#### **I. Purpose**

To establish policies and procedures for the completion and submission of time and effort reporting for the University as required by OMB 2 CFR 200.328 Uniform Guidance. In order to receive and maintain eligibility for funding, sponsoring agencies require accurate and reasonable documentation to support that labor charged to sponsored accounting units are consistent with the effort expended.

#### **II. Policy**

As a recipient of federal funding the 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 awards. The University requires all individuals who receive federal sponsored funding to comply with University policies and sponsoring agency regulations regarding the proposing, charging, and reporting of effort on those awards.

University faculty and staff are expected to charge their time to sponsored awards commensurate with the committed effort expended on all activities they perform. Payroll charges to sponsored awards, and cost sharing recorded for faculty and staff, serve as the initial data points for the University’s system.

All faculty and staff at the University who are paid directly from any federal award must complete and submit effort reports. Any faculty and staff who provide some effort on federally sponsored projects for which the effort is re-distributed to a federally sponsored project must complete and submit effort reports.

Time and effort certifications are required to be completed monthly or as designated by the grant.

#### **III. Scope of Work**

This policy is applicable to all individuals involved with the administration and conduct of federally sponsored award activities, including all schools and departments, principal investigators, and other research personnel.

Adherence to this policy is required for all effort related to federally sponsored awards as well as any non-federal awards where the non-federal sponsor requires effort reporting.

The University uses an “After-the-Fact Activity” system to comply with the federal effort certification requirement. Distribution of salaries and wages for employees working on externally-funded projects will be supported by certification reports that reflect an after-the-fact reporting of the actual distribution of activity of employees.

Employee Effort Certification Reports will reasonably reflect the distribution of efforts expended by the University faculty and staff involved in federally-funded grants, contracts, and cooperative agreements.

#### **IV. Responsibilities**

##### **Principal Investigator (PI)**

PI's are responsible for certifying their own effort reports. The PI must ensure that the total percent for each sponsored project, including cost sharing, and the amount directly charged to the fund is correct. Additionally, effort reports must be certified for any employee or student employee who is paid from a federal or federal flow-through funded grant, or who have a cost sharing commitment of effort on such a fund. Effort reports must be certified by a person with first-hand knowledge of all the activities of the person for whom the certification is made. A PI is not allowed to certify for another faculty member, even if the faculty member worked on one or more of the PI's projects. PI's are required to take part in, and ensure that his/her staff take part in, required and voluntary education and training programs offered by the University, professional organizations, and regulatory agencies in order to be thoroughly knowledgeable about the conduct of research.

##### **Department Chair/Director, Dean, or AVP**

Assist with assuring the project effort reporting form is completed, certified, and returned to the Office of Research and Sponsored Programs (ORSP) within 35 days of the distribution. Follow up with PI's and Co-PI's if notified that the effort reporting form is not returned to ORSP within the correct time frame.

#### **V. Procedures**

In support of this policy, all procedures, forms, and instructions can be found on the ORSP website: <https://ferris.edu/research/>.

For questions about this policy, contact Grant Accounting at ext. 3905