Effort Reporting Summary:

- Effort certification is a compliance requirement of accepting federal awards.
- Substitution of the second second
- C of I uses "after the fact activity records" 3x per year (end of: fall term, spring term, & summer).
- * Each faculty member certifies own effort.

<u>Goals today</u>: understand ER, prepare for fall reporting, become familiar with ER process

How is effort determined?

* NOT based on a 40-hour work week or FTE

- Based on activities for which you are compensated by The College of Idaho including:
 - A) Sponsored project activities
 - **B)** Institutional (non-sponsored) activities
 - Administration (including duties as chair, dean, etc.)
 - Instruction (teaching)
 - Research (excludes externally funded research)
- * Expressed in percentages (%A and %B -aggregate)
- Must total 100% each reporting period

Lumped"

ER system "reasonably reflects" paid activity

OMB Circular A21 J10b(1)(c): "...it is recognized that, in an academic setting, teaching, research, service and administration are often inextricably intermingled.... Reliance, therefore, is placed on estimates in which a degree of tolerance is appropriate."



Components of "100% effort"

Sponsored project activities include:

- Effort on federal grants or contracts* (e.g., NIH, NIH-INBRE, NSF, DOD, BLM)
- Effort on non-federal research projects* (e.g., a foundation grant)

Administrative effort related to a sponsored project*

- Writing progress reports
- Holding a meeting with staff
- Presenting research results at a scientific conference
- Reading scientific journals to keep up to date with the latest advances in the project topic area.
- * Even if salary is not all paid by the sponsor (i.e., cost sharing)

Components of "100% effort"

Institutional activities:

- Teaching
- Advising
- Department Chair duties
- Attending general departmental faculty meetings
- Serving on College committees
- Proposal preparation

Pay distribution reflects effort distribution

- Salary and wages charged to sponsored projects should reasonably reflect the proportionate share of time spent on the project.
- Cost share commitments must be included in the effort distribution.
- Salary payments cannot be made for effort not applied to the project.
- * Federal requirements stipulate that anyone certifying effort for another individual must credibly have <u>first hand</u> knowledge of that individual's actual effort.

How does the process work?

- Effort report form is pre-populated with salary distribution
 - Each academic term for faculty (i.e., each semester and summer)
 (Monthly time sheets serve as ER for non-faculty employees)
- Individual reports percentages of actual effort and verifies the report as a reasonable estimate of actual effort worked by signing it. Useful resources to help document effort allocations include these items:
 - Calendars
 - Journals, logs, and blogs
 - Teaching schedules
 - Leave reports
 - Correspondence
 - Outside activity forms

Red Flag Issues / Audit Triggers

- Late effort reports
- Substitution For the second second
- Percentage outside of sponsored project is insufficient to credibly cover teaching, administrative, or other College work
- Multiple post-certification revisions
- Significant inconsistencies between effort report and other documentation such as:
 - Calendar
 - Leave reports
 - Other support forms
 - Lab records