

University of Central Florida Guidance & Directive	
Guidance & Directive No: ORC-03	Date of Adoption/Revision: August 2018
Subject	Effort Reporting
Authority	OMB Uniform Guidance, Subpart E
Applicability	Administration of Sponsored Projects

Statement and Purpose

Federal and state agencies, private foundations, industry, and other organizations provide significant funding to enable the University of Central Florida (University) to conduct research, public service and training projects. As such, the University has in place systems of internal controls to ensure that compensation for personal services are accurate, allowable, and properly allocated to federal and non-federal sponsored activities. The University's Effort Certification and Reporting Technology (ECRT) system assures these external sponsors that funds are properly expended for the salaries and wages of those individuals working on the projects they sponsor. This effort reporting system provides the principal investigator means for certifying the salaries and wages charged to sponsored projects are consistent with the effort contributed.

The [Uniform Guidance Subpart E §200.430](#) contains the federal regulatory requirements for internal controls over certifying time expended on sponsored projects. The University's practice is to utilize an after-the-fact effort reporting system to certify the salaries charged, or cost shared to sponsored awards, are reasonable and consistent with the work performed. The individual's effort is first assigned to specific awards in the payroll system based on anticipated activities. Actual effort expended on each project is certified by a responsible person with suitable means of verification that the work was performed, generally the principal investigator, at the end of specified reporting periods. The effort certification should be a reasonable estimate of how time was expended. Section [§200.430\(c\)](#) states, "It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to Federal awards for IHEs [Institutions of Higher Education] a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected."

The Effort Certifications are the primary means for complying with the federal regulations relating to effort certification.

General Information

All University employees who perform services on or contribute effort toward a sponsored contract or grant must certify 100% of their full time equivalency (FTE) effort. Faculty, faculty adjuncts, Administrative & Professional, USPS, OPS personnel, Graduate Students (OPS - GRA), and undergraduates performing services towards a sponsored project must have their effort reported once every academic semester.

Non Certified Effort

If effort is not certified, salary charges must be removed from the sponsored project and applied to the department of origination at the discretion of the Office of Research (OR). All employees involved in certifying effort must understand that inaccurate, incomplete or untimely effort reporting may lead to penalties and funding disallowances.

Procedures

Establishing professional duties

Faculty and staff of the University of Central Florida are appointed by the University to perform a unified set of duties encompassing all forms of academic work, with one or more departments or centers designated as the faculty or staff member's appointment home. Specific duties are delineated at the time of initial appointment and modified as necessary by the department chair(s) and the faculty or staff member over the course of the appointment.

Faculty generally have responsibilities for activities such as non-sponsored research, instruction, administration, and service or clinical activity that would preclude their devoting 100% effort to sponsored activities. Proposal preparation for new and competing renewals would also preclude faculty from devoting 100% time to research. Salary support for teaching, administration, service, clinical activity, institutional governance and proposal preparation effort must come from non-sponsored funds, except for normal scholarly activity during unpaid summer months (for those with nine month appointments) and sponsored projects specifically awarded for those purposes.

Unless otherwise indicated in the letter of appointment, the University does not specify the number of hours per week a faculty or staff member must work. There is an expectation that members of the faculty will work the hours necessary to carry out the professional responsibilities of the position.

Establishing a distribution of effort

Faculty and staff conduct research, instruction, and service and seek extramural support from federal and other sources; some extramural awards include salary support for the effort expended on projects. To determine the appropriate amount of salary support, the faculty or staff member must:

- calculate the amount of effort to be expended on a project relative to total University effort and express this effort as a percentage, and
- assign an amount of compensation associated with this activity.

The expectation of the University is for faculty and staff to calculate their total University effort, including teaching, research, extension, and service, and to align this activity with their compensation received from the University. For each funded project, faculty and staff calculate their projected effort toward sponsored project as a percentage of their total UCF effort, multiply this percentage by their institutional base salary, and thereby determine the amount of salary support to be requested in a project proposal.

Faculty and staff should allocate their effort based on the composite of all activities performed as part of their University appointment. This will be different for each person. Service may include outreach, administration, public speaking, and other activities on behalf of the University. Each faculty or staff member must, however, have a coherent accounting of effort. Faculty and staff do so by calculating how their time is devoted to each major activity, averaging over some period of time, usually by semester, and allowing for fluctuations in duties, e.g. one-month assignments for teaching. Such calculations must be internally consistent so that, if asked, a faculty or staff member can explain to an inquirer they estimate the approximate amount of time spent in research, teaching, etc. and how the sum of these equals 100% effort in any given period. A faculty or staff member who has a part-time appointment should calculate effort as a percentage of their total University effort and follow the calculation outlined above. For example, an individual appointed at 70% and committing one half of their total University effort to a research project would report 50% effort on the project and multiply 0.5 by their institutional base salary to recover salary costs on a research project. Note that effort will change and must be revised if the FTE appointment changes.

Proposing effort

Levels of effort proposed toward any sponsored project should be consistent with the actual effort that each individual is expected to expend on the project during the relevant project period(s). The amount of salary support requested should be determined by multiplying the proposed level of effort by the individual's institutional base salary.

For proposal purposes, proposed level of effort must be expressed in accordance with sponsor requirements. Some sponsors require that level of effort be proposed in terms of person months (for example, three person months of a 12-month appointment). Other sponsors expect the proposed level of effort to be expressed in percentage terms (e.g., 25% of total UCF effort). In either case, the requested salary support should be determined by multiplying the proposed level of effort by the individual's institutional base salary. For example, if the proposed level of effort is 25% (or three months in a 12-month appointment), and the individual's institutional base salary is \$100,000, the requested salary support would be \$25,000 per year.

Cost Sharing commitments

The University must ensure cost sharing requirements of sponsored agreements are accounted for and reported in a manner consistent with the requirements set forth in federal regulations, primarily the Office of Management and Budget (OMB) Circulars A-110, A-21, and the Uniform Guidance 2 CFR 200. Cost sharing represents a commitment by the University.

Cost sharing should be limited only to those situations where:

1. it is mandated by a sponsor, or
2. the University has determined that such a contribution is necessary to reflect accurately the resources that must be expended to accomplish the project objectives, or
3. it is necessary to fulfill the University's requirement of a minimum commitment to the project by the principal investigator or project director.

All personnel working on a sponsored project must assign a portion of their 1.0 F.T.E. to the activity as either a direct charge to the sponsored project or to another university fund account

when **mandatory salary cost share** is required by the sponsor. Voluntary committed cost share is not authorized on a sponsored project without the express written authorization of the unit head and the Office of Research.

Changes in Time and Effort Commitment

Modifications to time and effort commitments may require sponsor notification/prior approval and formal modification in the award documents. For non-federal sponsored projects, the Principal Investigator (PI) must conform to the terms and conditions of the particular contractual agreement. For federal sponsored projects, the PI must conform to the Uniform Guidance which requires prior written approval from the awarding agency for either of the following circumstances involving changes in PI commitment:

- A reduction in time devoted to the project of 25% or more from the proposed and awarded level; and/or
- An absence from the project for more than three months.

For any additional requirements, the PI must review and conform to the award and/or policy of the specific sponsoring agency.

The PI, Department Chair, or Department Administrator must contact the Office of Research to facilitate required approvals in the circumstances stated above. If, in the original award, the University committed to fund a portion of the PI's effort as cost sharing and the PI reduces the overall committed level on the project, OR must negotiate reductions in levels of the cost-shared component of effort, as appropriate. In addition, when a PI's faculty appointment will terminate prior to or during a project's period of performance, OR must inform the sponsoring agency.

Mandatory training

Faculty and staff members who work on sponsored projects, must complete a training program on the principles of effort, commitments, and certification.

An individual must complete the training within 30 days of the date on which their first effort statement is available for certification with the University's Web-based certification system. Certifiers fulfill the training requirement by completing the on-line, Web-based training.

Employees working on sponsored projects must complete time and effort report training prior to the project account set-up and no less than once every four (4) years.

Certifying effort

Whose effort must be certified?

Effort must be certified for faculty members, staff members, students, and postdoctoral trainees who meet either of the following criteria:

1. The individual's salary is charged in whole or in part directly to a sponsored project.

2. The individual expends committed effort on a sponsored project, even though no part of the individual's salary is charged to the project. i.e. Faculty with cost share; researchers whose effort was to a sponsored project, but payroll charged to faculty overhead/startup account or department account

How is effort certified?

For all personnel who receive compensation from UCF, effort is certified via the Web-based Effort Certification and Reporting Technology (ECRT) system. For UCF personnel who have zero-dollar, zero-percent appointments and therefore receive no compensation from the University, effort is not required to be certified. This is because the Web-based ECRT system can only be used to certify effort for individuals who receive compensation from the University. A PI with a zero-dollar, zero-percent appointment can still log into ECRT to certify the effort for the graduate students, university staff, and postdoctoral trainees who work on his or her sponsored projects.

The ECRT application can be accessed at <https://ecrt.research.ucf.edu/ecrt/> or via apps.research.ucf.edu and selecting the ECRT application.

When must effort be certified?

Effort must be certified by the employee and processed by the Department Effort Coordinator within 30 days of the date on which the statement becomes available. The University certifies effort on a semester basis (Spring, Summer, Fall)

Who certifies for whom?

Each effort statement must be certified by a responsible person with suitable means of verifying that the effort indicated was, in fact, expended in the proportions shown on the ECRT statement. The University's practice is:

- All faculty and academic staff members certify their own effort.
- All principal investigators certify their own effort, regardless of the type of position they hold at UCF.
- A principal investigator certifies the effort for all graduate students, postdoctoral trainees, and non-PI university staff who contribute to all of his or her projects.

When a graduate student, postdoctoral trainee, or non-PI university staff member contributes to multiple sponsored projects for two or more principal investigators:

- Any of the PIs may certify all of the individual's effort, as long as he or she has suitable means of verifying the work was performed as allocated.
- Each PI can certify the portion of the individual's effort about which he or she has suitable means of verifying the work was performed.
- The PIs and the effort coordinators should work together to ensure that all of the individual's effort is certified in a timely manner, by one or more responsible people with suitable means of verifying that the work was performed.

In some circumstances, the PI may not have suitable means of verifying the effort for sponsored project staff. For example, this may occur in the case of large center grants, where an individual is the PI by virtue of his or her position in the University. With the Web-based ECRT system, the University can authorize an individual to certify the effort statements for project staff instead of the PI. When such an arrangement is needed:

1. The PI and the effort coordinator must work together to identify the individual who has suitable means of verifying the effort for the affected staff.
2. The effort coordinator or PI must communicate to the Office of Research and Commercialization the need for the arrangement, and the name of the individual who will certify the effort.
3. OR will then establish the authorization for the alternate certifier.

Time and Effort Reporting

Self-Certifiers (PIs, faculty members, A&P employees) are required to review their effort statements in the ECRT system and determine whether the percentages reasonably reflect the committed effort expended and the work performed on each sponsored project and the aggregate effort associated with “all other activities” displayed on the certification. Variances of up to and including 5% of total salary, for each project listed, are allowable and do not require an adjustment or recertification. Variances over 5% for each project should be corrected, in compliance with the Cost Transfer Policy, prior to final approval of the certification. Effort must be certified by the employee and processed by the Department Effort Coordinator within 30 days of the date on which the statement becomes available. Through ECRT, time and effort must be certified by the person whose time and effort is being reported, or by a person having first-hand knowledge of the employee’s activities. Individuals certifying effort that do not have first-hand knowledge of the employee’s actual time and effort create a significant audit risk. By certifying effort, all University employees are attesting to the following statement:

“I certify to the best of my knowledge that salary, wages and other costs charged to this project are appropriate in relation to work performed and costs incurred on this project. Where required, corrections have been or will be made through the University’s PeopleSoft accounting system.”

Time and effort certifications must be completed by the certifier and reviewed and processed by the Department Effort Coordinator within the 30 day certification period.

Proxies

All University PIs/faculty/staff members are required to complete their own effort certifications. Requests for proxies for these individuals will only be granted in extenuating circumstances (leave of absence, FMLA, sabbatical, etc.)

Designees

All PIs are required to certify their Effort Statement(s). In certain circumstances, the PI can delegate this responsibility to another individual with first-hand knowledge of his or her

sponsored project(s). The individual who completes the effort certification(s) must attest the salaries charged and effort expended reasonably reflect work performed on the project and the certifier has sufficient technical knowledge and/or is in a position that provides for suitable means of verification that the work was performed. Examples of designee assignments includes co-PI supervision of researchers.

Time & Effort Reporting Compliance

Each PI and Department Effort Coordinator is responsible for monitoring the timely submission of time and effort certifications and compliance with negotiated levels of committed effort using the ECRT system. ECRT will assist the PI's, Department Effort Coordinator, and OR by reconciling after-the-fact time and effort amounts reported to actual payroll expenses incurred. Any variances identified by ECRT during the time and effort certification process must be documented and resolved with the department in which the payroll expense originated. It is essential that the distribution of effort certified in ECRT be consistent with the payroll appointment. When the activity reported in ECRT differs from the actual salary distribution, the variance must be resolved and a salary transfer must also be submitted to reflect the change. If effort certifications are not processed by the departments in a timely manner, ECRT will automatically notify the responsible Department Administrators according to the following timeline:

1 day after the end of the period being certified – notify the PI, Department Effort Coordinator and Department Chair.

7 days after the end of the period being certified – notify the PI, Department Effort Coordinator and Department Chair and Dean

14 days after the end of the period being certified – notify the PI, Department Effort Coordinator and Department Chair, Dean and Director of Compliance

21 days after the end of the period being certified – unverified salary charges will be removed from the sponsored project and applied to the department of origination at the discretion of the Office of Research and Commercialization (OR).

Incomplete effort reporting training and non-certified effort

Effort certification is required by sponsors including the federal government. A failure to certify effort correctly and in a timely manner could jeopardize UCF's federal research funding. To ensure compliance with federal policies and protect the interests of UCF, the university is instituting consequences for failing to certify effort and complete the training. Any faculty or staff member who fails to fulfill the appropriate responsibilities noted below may be the subject of disciplinary action, up to and including dismissal, under university policies and procedures.

To be considered timely, effort statements must be completed within the 30-day certification period. The certification process requires two steps. The effort statement must be:

1. Certified by the principal investigator, non-PI faculty or academic staff member, and
2. Reviewed and processed by the effort coordinator.

Only after both steps are accomplished is the effort statement regarded as complete, making it an official record of the university.

Administrative and Fiscal Consequences

If effort statements are not completed in a timely manner, administrative or fiscal consequences will ensue.

If effort is not properly certified, salary charges must be removed from the sponsored project and applied to the department of origination at the discretion of the Office of Research and Commercialization (OR). All employees involved in certifying effort must understand that inaccurate, incomplete or untimely effort reporting may lead to penalties and funding disallowances.

Administrative consequences are enacted if effort statements are not completed within the 21-day delinquent certification period.

Adjustments to effort and salary distributions

Confirmations of effort distributions

Effort statements are designed to confirm salary charges are in alignment with effort. Therefore, the effort statement is a good tool for identifying allowable transfers of salary charges. When a certified effort statement indicates a salary distribution from a period being certified was not correct, a confirmation of effort distribution (requiring a salary transfer from one account to another) may be required to update the original distribution. This confirmation is a mechanism to finalize provisional salary charges to the sponsored project. Confirmations of effort distribution are an important and appropriate part of sponsored project administration.

Cost transfers after effort certification

Once charges for personal services have been certified on an effort statement and confirmations of the effort distribution are complete, subsequent changes to the salary charges must be carefully scrutinized. Remember: "If the initial cost distribution was certified by a 'responsible person using suitable means of verification,' how can a change to that distribution be appropriate?" Federal officials and institutional administrators, alike, will question these scenarios. If it is determined that a cost transfer is acceptable, the circumstances must be clearly documented. Retroactive adjustments charging salary onto a sponsored project are allowed only in keeping with the University's policy on cost transfers. A request to transfer salary charges off of a sponsored project to a university fund account (e.g. due to a cost overrun) will rarely require the same level of scrutiny, though repeated cost transfers could be a sign of poor internal controls. A salary cost transfer after the effort certification period may give rise to a need for recertification of an effort statement. When this is the case, the criteria for reviewing the salary cost transfer request are consistent with the criteria for reviewing the recertification event. To minimize the potential need for cost transfers after effort certification, PIs, supported by their department administrators and effort coordinators, should review sponsored project budget statements, and payroll expense distribution reports monthly to ensure that when the effort statements are made available for certification, the information is accurate and up-to-date.

Recertification of effort

Recertification of effort is a change to the effort distribution on an effort statement that occurs after (a) an individual has certified the statement, and (b) an effort coordinator has processed the certification. Two events can precipitate a recertification of effort:

1. A certifier can ask to change the effort distribution on the statement itself.
2. A salary cost transfer after effort certification results in a need to change the distribution of effort on an effort statement.

For each reporting period, certification occurs during a 30-day certification window. Up through the last date of the certification window, a certifier can change the effort distribution on a certified statement by contacting the effort coordinator, who is authorized to reopen the effort statement for recertification without further review of the request.

Once the last date of the certification window has passed, a subsequent recertification can call into question the reliability of the certification process. Therefore, any subsequent recertification request requires justification that clearly sets forth why previous effort was erroneously certified, and why the requested change is more appropriate within the context of law, federal requirements, or University policies and procedures. Such requests are submitted to the Director of Compliance in the Office of Research. Only in the most compelling of circumstances will such a request be approved.

Duties and Responsibilities

Effort reporting is a federal compliance requirement. There are many individuals involved in this process and each one has a role in ensuring that certifications are accurate and completed on time.

Certifiers (Principal Investigators (PIs), Faculty, Staff and Unit Leadership)

- Understand federal requirements related to effort
- Understand their own as well as their staff members' (non-faculty personnel) levels of effort committed, charged and reported on all applicable awards
- Ensure the appropriateness and accuracy of all effort expended on sponsored projects
- Certify effort statements of graduate students to accurately reflect their effort during effort period
- Review, initiate corrections if necessary, and electronically certify their individual Effort Statements and the Effort Statement(s) of their applicable researchers
- Communicate significant effort changes to the department/local-level effort coordinators
- If applicable, request, via email, that the certification responsibility be delegated to another individual who has sufficient technical knowledge and/or is in a position that provides for suitable means of verification that the work was performed
- Review salary charges on awards on a routine basis with grant manager and identify any effort-related changes and communicate with administrators to post corrections if needed
- Certify effort in a timely and accurate manner

Department, including Effort Coordinators

- Understand federal requirements related to effort
- Establish salary allocations according to the budget, the terms and conditions of the award, and the direction of the principal investigator
- Promptly process changes to salary allocations as needed
- Promptly process cost transfers
- Document effort commitments and cost sharing for sponsored projects
- Review effort statements for accuracy on an ongoing basis
- Provide assistance to principal investigators, faculty, and staff as they certify effort
- Review and process each certified effort statement, following up with the certifier if changes are required
- Re-open an effort statement for recertification, if requested to do so before the end of the certification window
- Forward to OR a request for recertification, if the request occurs after the end of the certification window
- Forward to OR all requests to authorize an alternate to certify the effort for project staff, instead of the PI

College/School

- Review proposals for appropriateness of effort and cost sharing commitments, per University policies
- Review award documents for potential changes to effort and cost sharing commitments
- Ensure that appropriate cost sharing sources and effort commitments are documented as needed
- Ensure that cost transfers are completed and documented appropriately, and routed in a timely manner
- Ensure that effort coordinators and other personnel involved in managing effort are familiar with Effort and Commitment principles, policies, and procedures
- Ensure that effort is certified in a timely manner

Office of Research

- Develop and implement effort reporting policies and procedures
- Develop educational programs for all employees involved in the effort certification process.
- Develop and maintain Effort Management Reports for use by administrators throughout the University
- Ensure that the effort system produces accurate effort statements in a timely manner.
- Monitor system to ensure compliance
- Monitor the effort process for timely submission and report findings to departments
- Provide training on Effort and Commitment principles, policies, and procedures

Definitions

Central Office Administration – Office of Research

Committed (Mandatory) Cost Share – Time and Effort (salary) funded by a university department fund source that is required by the sponsor (specifically committed in the project budget).

Committed Time and Effort – The amount of the employee work effort applied to a sponsored project measured by the amount of salary or wages charged during a set period of time and or the percentage of the employee's FTE assigned during a set period of time.

Designee- An individual other than the Principal Investigator assigned the responsibility to certify effort of all non-self-certifiers that are associated to a Research ID (RID) or project. The individual must have means of verifying effort on the RID or project.

ECRT- Effort Certification & Reporting Technology System. The after-the-fact web based time and effort reporting system that allows personnel to certify their effort for a specific time period.

Effort Coordinator- Department Managers that review and approve the effort statements to complete the certification process.

Effort Statement- Provides payroll and certification data for individual employee to track effort towards sponsored and non-sponsored University activity.

Employee – A person employed by the university on a faculty, Administrative & Professional (A&P), University Support Personnel System (USPS) and Other Personal Services (OPS) appointment.

e-PAF – University's Electronic Personnel Action Form used by Human Resources to assign the employee's salary or wage to a department or sponsored project account.

Full Time Equivalence (FTE) – Employee work assignments are based on a minimum 40-hour workweek. FTE is allotted to employee assigned duties in such proportion to each duty as to reach 1.0 FTE.

Institutional Base Salary (IBS) – Is defined as the annual compensation paid by the university for the employee's appointment. In no event will charges to a sponsored project(s), irrespective of the basis of computation, exceed the proportionate share of the IBS for that period. IBS excludes any income that an employee earns outside of their university FTE assignment.

Non-Self Certifier-(OPS Students, USPS, Graduate Research Assistants (GRA), Graduate Assistant (GA), Teaching Assistant (TA)).

Proxy- An individual with first-hand knowledge of sponsored research activity who certifies on behalf of personnel unable to complete certification (Typically a Co-PI or Department Chair). Reasons for proxy may include: faculty no longer at the university, faculty on sabbatical, or FMLA.

Principal Investigator - The primary individual responsible for the preparation, conduct, and administration of a sponsored research and development grant, cooperative agreement, training or public service project, contract, or other sponsored project in compliance with applicable laws and regulations and institutional policy governing the conduct of sponsored research.

Salary & Wage Cost Assignments – The amount (value) of the employee’s salary or wages assigned to a sponsored project(s) in the university’s official records during a set period of time.

Self-Certifier-(Faculty, Adjunct Faculty, Administrative & Professional (A&P), Post Doctorate Associate PDA). Certify effort for themselves as well as any researcher(s) indicated as a non-self-certifier he/she may be supervising.

Sponsored Project – Research executed by university employees using any university space, facilities, materials, equipment, or property which is financed by contract payments, grants or gifts from any source (UCF Regulation UCF-2.027). Sponsored Research supports research and development, but it also includes instruction, training, professional development, curriculum development, community and public service projects, and Commercialization. Sponsored Research funding instruments also includes cooperative agreement, consortium agreement, and donation.

Time and Effort Reporting – Employee affirmation of their salary or wage cost assignment to a sponsored project(s).

Unit Leadership – College Dean’s, Center or Institute research Director’s and or their delegated officials.

Voluntary Committed cost share - means salary funded by the university that is specifically pledged on a voluntary basis in the proposal budget or the sponsored award, and/or salary funded by the university to conduct the research or services that is not Committed (Mandatory) Cost Share.