

Effort Reporting Policy

Effective Date:	February 26, 2015
Supersedes:	Revised policy
Policy Review Date:	3 Years - From the effective date
Issuing Authority:	Research Foundation President
Responsible Party:	Scott E. Shurtleff, Director of Sponsored Programs Services
Contact Information:	518.434.7284 scott.shurtleff@rfsuny.org

Reason for Policy

Effort reporting is required as part of The Research Foundation for The State University of New York's (RF) process to ensure and document that individual effort directly charged to FEDERALLY FUNDED sponsored programs is accurate and reasonable in relation to the actual effort dedicated to the sponsored program.

The governing regulations are found in the Office of Management and Budget ("OMB"):

- Circular A-21, "*Cost Principles for Educational Institutions*", Section J.10.
- Memoranda 01-06, "*Clarification of OMB A-21 Treatment of Voluntary Uncommitted Cost Sharing and Tuition Remission Costs*", January 05, 2001.
- On or after December 26, 2014, 2 CFR Part 200 is effective and applies to all new awards issued. Funding awarded prior to this date and/or incremental funding may still be governed by OMB Circular A-21, depending on the awarding agency's specific terms and conditions. New York State agencies, regardless of funding source, have also adopted the above federal regulations pertaining to effort reporting in the New York State Master Contract.

These regulations state that institutions receiving FEDERALLY-FUNDED and STATE-FUNDED sponsored programs must maintain systems and processes that document the distribution of activity and associated payroll charges to each individual sponsored agreement.

Statement of Policy

The RF must assure that the salaries charged or COSTS SHARED by SUNY and RF principal investigators (PIs) and employees to FEDERALLY-FUNDED and STATE-FUNDED sponsored programs are reasonable in relation to the actual work performed.

Method for Certification

The RF's EFFORT CERTIFICATION method is After-the-Fact Activity Records.

Whose Effort is Required to be Certified

All RF and SUNY employees with salary charges, reimbursed or COST SHARED, to a FEDERALLY-FUNDED or STATE-FUNDED sponsored program must be certified.

Who Must Certify Effort

PIs must certify their effort and the effort of staff working on their FEDERALLY-FUNDED or STATE-FUNDED sponsored programs. The PI may delegate this responsibility to a designated PROCY CERTIFIER who must have SUITABLE MEANS OF VERIFICATION.

When to Certify Effort

EFFORT STATEMENTS must be certified in a timely manner after the statements have been

reviewed by campus effort reporting administrators and released to certifiers. Certification should occur no later than 120 days after the end of the period of performance (i.e., the base effort dates), unless EXTENUATING CIRCUMSTANCES exist. If EXTENUATING CIRCUMSTANCES exist so that an effort statement cannot be certified in a timely manner campus effort reporting administrators must document the reason that certification required additional time.

Records Retention

Effort statements and the applicable documentation to support the EFFORT CERTIFICATION must be retained in accordance with the RF [Records Management Policy](#).

Responsibilities

The following table outlines the responsibilities for compliance with this policy:

Responsible Party	Responsibility
Principal Investigator	<ul style="list-style-type: none"> -Understand and apply the federal government, sponsor-specific, institutional, and RF requirements for EFFORT REPORTING in relation to the sponsored programs lifecycle. -Communicate with appropriate departments to ensure the accurate and timely processing of labor distribution adjustments, and the appropriate allocation of salary costs. -Ensure that all information reflected on the EFFORT STATEMENT (i.e., either through direct charge or COST SHARING) is accurate and reasonable in relation to the work performed; and make corrections as appropriate. -Ensure that his/her own EFFORT – and the EFFORT of the other persons he/she is responsible for – is certified accurately and timely. Monitor the charging of salary on sponsored agreements to ensure appropriate costing criteria is applied.
Various other campus roles (e.g., deans, provosts, department chairs/directors/administrators, institutional officials, operations managers, vice presidents for research) depending on the campus specific structure	<ul style="list-style-type: none"> -Understand and apply the federal government, sponsor-specific, campus, and RF requirements for EFFORT REPORTING in relation to the sponsored programs lifecycle. -Review the establishment of salary charges, COST SHARING, and committed effort on sponsored proposals/agreements to ensure reasonableness in relation to the project scope-of-work. -Review faculty appointments and annual salary. -Maintain effective internal processes and take corrective action with uncertified EFFORT/delinquent EFFORT statements, and the falsification of information on the EFFORT STATEMENT. -Assist principal investigators with the negotiation of EFFORT levels with sponsors if necessary. -Maintain effective internal processes to ensure compliance with the applicable and associated policies and procedures. -Maintain effective internal processes to ensure the accurate and timely processing of labor distribution adjustments and the appropriate allocation of salary costs across various sponsored accounts.
Campus sponsored program offices (e.g., pre-award, account establishment, post award, human resources) depending on the campus specific structure	<ul style="list-style-type: none"> -Understand and apply the federal government, sponsor-specific, campus, and RF requirements for EFFORT REPORTING in relation to the sponsored programs lifecycle. -Provide campus oversight for the operation and maintenance of the EFFORT REPORTING system. -Provide campus oversight for the EFFORT STATEMENTS by assuring their accurate and timely coordination, distribution, and collection. -Maintain campus EFFORT REPORTING procedures and provide education/training.

-Respond timely to coordinate/process labor distribution adjustments to ensure appropriate allocations of salary costs throughout the sponsored programs lifecycle.

Definitions

Effort – Is expressed as a percentage of the total amount of time spent on compensated and/or non-compensated work-related activities (e.g., research) in the conduct of a sponsored program.

Effort Reporting – Is the mechanism that is used to confirm that salaries and wages charged to each sponsored program are reasonable in relation to the actual work performed and the activity for which the employee is compensated by the institution. As per 2 CFR Part 200 section 430 (i)(1)(viii)(A) and Circular A-21, J.10.b.(1)(c) estimates with a degree of tolerance are appropriate.

Effort Statement – Is the documentation used to record an employee's actual effort on individual sponsored agreements.

Effort Certification – Is the affirmation by the certifier that the effort statement percentages are reasonable and accurate in relation to the work performed. Examples of this affirmation include electronic signature, manual signature or e-mail verification.

Extenuating Circumstances – Conditions that may occur that would prevent a certifier from certifying an effort statement in a timely manner, e.g., sabbatical, sick leave, no Internet access, etc.

Federally-Funded – Includes funding for sponsored programs from federal and federal flow-through sources.

State-Funded - Includes prime funding for sponsored programs from New York State agencies and New York State recipient or subrecipient flow-through funding.

Cost Sharing – Is that portion of a sponsored program budget that is contributed by the institution and/or other nonfederal sources – it is not reimbursed by the sponsor. For the purpose of this policy, in accordance with OMB Circular A-110, Cost Sharing also means "matching."

Proxy Certifier – An individual delegated the authority to certify effort for another individual. A proxy certifier has first-hand knowledge of the individual's effort and suitable means of verifying that the work was performed.

Suitable Means of Verification – Is an indication that the person certifying the effort on behalf of another individual has reasonable knowledge of the work performed by the other individual. Reasonable knowledge can be established by direct knowledge of the certifier, review of payroll records, or the monitoring of sponsored program documentation in support of the work performed.

Other Institutional Activities – Are the activities, other than sponsored programs, for which an employee is paid by SUNY. These activities include, but are not limited to: administrative duties, instruction, and public service.

Related Information

[OMB 2 CFR Part 200 et al.](#)

OMB Circular A-21: *Cost Principles for Educational Institutions* OMB Circular A-21

OMB Memoranda 01-06: *Clarification of OMB A-21 Treatment of Voluntary Uncommitted Cost Sharing and Tuition Remission Costs, January 05, 2001*

Effort Certification Training and Procedures for:

- [Principal Investigators](#)
- [Proxy certifiers](#)
- [Restricted effort coordinators](#)
- [Administrators](#)

[Cost Sharing Policy](#)

[Cost Sharing: Guide for Administrators](#)

[Records Management Policy](#)

State University of New York: [Faculty Salary Recovery from Sponsored Programs \(Document Number 1002\)](#)

Forms

None

Change History

Date	Summary of Change
December 26, 2014	Changed OMB reference to 2 CFR Part 200.
September 10, 2014	Revised the When to Certify Effort section and added a definition for Extenuating Circumstances.
June 23, 2014	Changed title back to "Effort Reporting Policy" and major revision of policy.
November 11, 2005	Changed title from "Effort Reporting Policy" to "Certification of Salary Distribution (Effort Reporting) Policy"
October 9, 2001	In first paragraph, change "100 percent of the activity" to "the percent of the activity"
September 19, 2001	New document derived from Personnel Activity Manual (PAR-P-020

Feedback

Was this document clear and easy to follow? Please send your feedback to webfeedback@rfsuny.org.

Copyright © 2012 The Research Foundation for The State University of New York