The Basics of Effort Reporting

A printer-friendly version of material from the on-line course for principal investigators and grants and contracts funded employees

April 23, 2009
Office of Research Administration
1. Introduction

This course was largely developed by the office of Research and Sponsored Programs (RSP) University of Wisconsin – Madison and has been modified for use by the University of Massachusetts. The University of Massachusetts gratefully acknowledges and appreciates the use of this material for our time and effort training.

This course is mandatory for faculty and academic staff who work on sponsored projects, and for others who serve as principal investigators on sponsored projects. Administrators and other members of the campus research community may also find it useful.

Course goals

The goals of this course are:

1. To explain the key principles of effort on sponsored projects
2. To communicate the requirements that apply in proposing, managing, and certifying effort on sponsored projects
3. To provide training in how to certify effort with the Effort Certification and Reporting Technology (ECRT) system

How this course is organized

The material is divided into ten modules. After some of the modules, there's a quiz. You must achieve a passing grade on the quizzes to complete the course. You can take each quiz as many times as you like.

Typically, it takes about an hour to complete this course. You are not required to do it all at once. If you stop before finishing, you can resume where you left off.

After this introduction (Module #1), the nine remaining modules cover the following topics:

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Why is it important to know this?
Each year, the university receives millions of dollars from organizations, including the federal government, that sponsor research and other UMASS activities. As the stewards of those funds, it is our obligation to comply with federal and university requirements to certify faculty and staff effort on sponsored projects.

To certify effort accurately, we must understand some key principles that are stipulated by the federal government. Many universities have paid multi-million dollar fines for not certifying in accordance with these principles. Currently, effort certification is a hot topic among federal auditors. A failure to propose, manage, and certify effort correctly could jeopardize the university's federal funding and lead to penalties for the university.

Coming attractions

Here are some of the key points you'll encounter in this course:

1. **Effort** is your work on a project, whether the sponsor pays your salary or not.
2. When you write yourself into a grant proposal, you are **committing** your effort to the sponsor.
3. If you reduce your effort, paid or cost-shared, on a federal grant by 25% or more, you must have agency approval. If you reduce your paid effort, you may choose to document cost-sharing so that the total effort does not decrease.
4. Many activities cannot be charged to a federally sponsored project. For example, the time you spend on these activities cannot be charged:
   a. Writing a proposal
   b. Serving on an IRB, IACUC or other research committee
   c. Serving on a departmental or university service committee
5. If you work on a sponsored project, you must certify your effort.
6. Certifying **effort** is not the same as certifying **payroll**.
7. Certification must **reasonably** reflect all the effort for all the activities that are covered by your UMASS compensation.
8. Effort is **not** based on a 40-hour work week.
9. Effort must be certified by someone with a **suitable means of verifying** that the work was performed.
10. Any indication that certification was based on factors other than actual, justifiable effort is a red flag for an auditor.

A word about terminology

Strictly speaking, graduate students receive stipends rather than salary. In this course, the term **salary** is used to refer to both salary for employees and stipends for graduate students.
Module 2. The basics of effort and sponsored projects

What is "effort"?

**Effort** is the time you spend on an activity, expressed as a percentage of all the time you spend on your UMASS job duties. Your UMASS job duties may include:

- Instruction
- Administration
- Research
- Service as a member of a committee or governance body
- Outreach to the community

A **sponsored project** is activity that is funded by a grant, contract, or cooperative agreement under which there is a scope of work, a specific budget, and specified terms and conditions. It requires detailed financial accountability and compliance with the sponsor's terms and conditions.

In this course we'll focus on effort associated with sponsored projects and the relationship of that effort to your non-sponsored activities.

What is effort certification?

If you work on a sponsored project, you're required to assure the sponsor that:

- You did, in fact, devote effort to the project at a level that corresponds with how you were paid from the project, and
- You've met your commitments of effort to the project, regardless of whether the sponsor provided salary support.

**Effort certification** is the university's means of providing this assurance to sponsors. To certify your effort, you'll review a statement that shows:

- The sources from which you were paid, and
- Your cost-shared effort on sponsored projects.

Your task is to make sure that the statement shows a correct distribution of your effort. This requires a good understanding of many things, including:

- Cost-shared effort
- Commitments to sponsored projects
- How to classify the things that you do, so you can sort them into buckets for the purpose of determining your effort distribution

In this course, the terms **effort certification** and **effort reporting** are used interchangeably.

Effort certification is not an exact science

Don't worry – you don't need to come up with a precise accounting of your time. Sponsors recognize that research, teaching, service, and administration are often inextricably intermingled.

Reasonable estimates are all that's expected. But there are some rules you must observe.
Certifying 100% of your UMASS effort

If you work on a sponsored project, what's important is the effort on that project in relation to your other effort. This leads us to the first rule:

You must certify 100% of your UMASS effort.

The next module explains what we mean by UMASS effort, as opposed to non-UMASS effort.

Effort is not based on a 40-hour work week

This is one of the most common misconceptions about effort on sponsored projects. Regardless of your appointment percent or the number of hours you work, your 100% effort equals all the activities for which you are compensated by the university – your total UMASS effort.

Examples

• If you have a quarter-time job, your 100% effort corresponds to everything you do for that job. So, for you, 0.25 FTE = 100% UMASS Effort.
• If you work 80 hours a week, your 100% effort corresponds to all the activities for which the UMASS compensates you during that time. Here, 80 hours = 100% UMASS effort.

This may seem counterintuitive, but it stems from cost accounting anomalies that would arise if 100% effort corresponded to a 40-hour work week and you worked more than 40 hours in a week. For example, let's say you devote 30 hours a week to sponsored projects and 30 hours a week to teaching. Under the traditional "40 hours equals 100%" rule, you're working 150%. If you divide your activity as 75% teaching and 75% sponsored research, then you've carved your 100% effort and related salary into more pie pieces than you have available.

If, alternatively, you were to charge 75% of your salary to sponsored projects and 25% to university funds, your compensation per hour of sponsored research is three times your compensation per hour of teaching. That's a disproportionate charge to sponsored projects because the amount of time spent on each activity was the same. This violates federal regulations that govern how the university charges a sponsor for salary expenses.

So, no matter how you slice it, cost accounting standards make it impossible to base effort on a 40-hour work week.

Sponsored and non-sponsored activities

If you teach a class and work on a research project, you're probably aware that you can't charge your teaching time to your sponsored project. The time you spend on your research project is sponsored activity. Classroom instruction is an example of a non-sponsored activity.

Sometimes it's hard to know whether to classify an activity as sponsored or non-sponsored. For example, mentoring a graduate student is sponsored activity only if the mentoring is specific to a research project. Otherwise, it's instruction – a non-sponsored activity.

The federal government is very specific regarding the activities that are allocable to sponsored projects. This leads us to a second rule:

When determining your effort distribution, you must distinguish between activities that are allocable to sponsored projects and those that are not.
The next module provides more details about this.

**Putting it all together**

The diagram below illustrates the net effect of these two rules. In this diagram:

- The pie chart represents your UMASS effort – the activities for which you are compensated by the university.
- This pie is divided into *only two pieces*: the activities that are allocable to sponsored projects, and those that aren't.

If you work on multiple sponsored projects, you'll subdivide the sponsored piece into two or more slices – one per project. In short, effort certification is largely about being able to answer two key questions:

1. How big is your pie?
2. What's the relative size of the slices?
Module 3. UML Effort and what's allocable to sponsored projects

This section contains some long lists. You don't need to memorize them, as they're posted for your reference on the ORA web site [http://www.uml.edu/ora/Time_%26_Effort.html](http://www.uml.edu/ora/Time_%26_Effort.html)

But you should understand the general principles regarding how to classify your work activities as well as some specifics we highlight along the way.

What counts as UML Effort?

Because you must certify 100% of your UML effort, it's important to know what counts as UML effort and what doesn't. The basic rule is:

Your UML effort includes all the professional activities for which you are compensated by the university.

Specifically, it includes the following:

- Externally sponsored research, including all activities that the federal government recognizes as allocable to sponsored projects
- Departmental and university research that is not funded by an outside source
- Instruction and university supported academic effort.
- Administration, including your role as department chair, program director, or dean
- Service on institutional committees such as IRBs, IACUCs, and governance bodies
- Effort expended on preparing proposals for new or continuing sponsored projects
- Activities related to pursuing intellectual property
- Public service activities directly related to UML professional duties
- Outreach activities that directly relate to UML professional duties
- Paid absences, including vacation time and sick leave

When you receive compensation from someone else, the activity is **not** part of your UML effort. In addition, some other uncompensated activities do not count as UML effort. Specifically, the activities you **SHOULD NOT** count as part of your total UML effort are:

- Consulting outside of the UML
- Continuing Education Courses
- Advisory activities for sponsors, such as service on an NIH study section or NSF peer review panel, regardless of whether you are compensated in any way
- Peer review of manuscripts, regardless of whether you are compensated
- Leadership in professional societies
- Volunteer community or public service not directly related to UML effort
- Lectures or presentations for which you're compensated by a source other than the UML
- Other special activities resulting in a payment of a bonus or other one-time extra compensation
- Activities over and above or separate from your assigned responsibilities in your primary position, including service as the primary editor of a journal
- Unpaid absences
Activities that can be allocated to a sponsored project

Your sponsored effort is part of your UML effort. When you certify sponsored effort, it’s important to know what activities can be allocated to a sponsored project. The basic rule is:

A sponsored project can only be charged for activities that directly relate to the work of the project.

Here are some specific activities that can be charged to sponsored research:

• Directing or participating in any aspect of the research related to the specific project
• Writing a progress report for the project, sometimes called a continuation proposal
• Holding a meeting with lab staff to discuss the specific research project
• Activities contributing to and intimately related to work under the agreement, including:
  • Participating in appropriate seminars
  • Consulting with colleagues about specific aspects of the project
  • Delivering special lectures about specific aspects of the ongoing activity
  • Attending a scientific conference held by an outside professional society to present research results
  • Reading scientific journals to keep up to date with the latest developments in one's field
  • Mentoring graduate students on the specific research project

• Making an invention disclosure, and some other activities related to pursuing intellectual property – as long as it is directly related to the project and the effort occurs within the project award period

Activities that cannot be allocated to sponsored projects

Here are some specific activities that cannot be charged to a sponsored project because they do not directly relate to the work of the project:

• Proposal-writing, except for non-competing continuations (progress reports); this includes:
  • Developing necessary data to support the proposal
  • Writing, editing, and submitting the proposal

• Administration, including service as a department chair or dean
• Instruction, office hours, counseling for students, and mentoring graduate students on something other than a specific research project
• Service on an IRB, IACUC, selection committee, or other similar group
• Course or curriculum development not specific to your research project
• Writing textbook chapters
• Fundraising
• Lobbying

In addition, work that falls outside of the definition of UML effort would not be allocated to a sponsored project. This includes:

• Service as the primary editor of a journal
• Peer review of manuscripts, regardless of whether compensation is received
• Advisory activities for sponsors, including service on an NIH study section or NSF review panel,
Examples of specific activities and how to classify them

From the above lists, a few items deserve special mention:

<table>
<thead>
<tr>
<th>Type of activity</th>
<th>How to classify it</th>
</tr>
</thead>
<tbody>
<tr>
<td>Writing a proposal for a new sponsored project or competing continuation</td>
<td>You cannot charge a sponsor for your time spent doing this. You must count this as a non-sponsored activity. It falls under the heading of administration.</td>
</tr>
<tr>
<td>Mentoring students</td>
<td>When the mentoring is specific to a sponsored project, this is a sponsored project activity. When the mentoring is of a general nature, or specific to something other than the sponsored project, you cannot count it as a sponsored project activity.</td>
</tr>
</tbody>
</table>

Effort that's too small to count

Activities that you do on an infrequent, irregular basis are sometimes "so small" that they cannot (and should not) be accounted for. In any calculations of effort, you can ignore these activities when they add up to less than one percent of your total UML effort.

Activities that may qualify as de minimis effort – depending on their nature and extent, and on the amount of time you devote to them relative to your total UML effort – include service on an ad hoc committee (like a search committee) and participating in department or division meetings.

In addition, some activities are intrinsic to your daily routine and not separate from your teaching, research, administrative, or other duties. Requesting your parking sticker and submitting a travel expense report are examples of such activities. Do not count these in a separate category of effort.

Grant proposal writing and well-defined, regular administrative or service activities cannot be considered "so small" and therefore don't qualify as de minimis effort.

True UML activities cannot be characterized as unfunded, volunteer, or weekend work

Activities that are closely associated with your UML professional duties must be reported as UML effort. Some of those activities are: proposal writing, instruction, university-related administrative duties, and service on committees. You cannot characterize them as "unfunded" or "volunteer" activities, or "weekend work," for which no UML salary is paid, because federal regulations prohibit this.
Module 4. Commitments to sponsored projects

Three key terms: Cost sharing, cost-shared effort, and paid effort

Often, the sponsor pays all of the costs associated with a sponsored project. But sometimes UML bears a portion of the costs. **Cost sharing** is the portion of the total costs that is borne by UML rather than by the sponsor.

**Cost-shared effort** is any work on a sponsored project for which the university, rather than the sponsor, provides salary support. **Paid effort** is work for which the sponsor provides salary support.

Both types of effort are important in the effort certification process.

What is a commitment?

A **commitment** is the amount of effort you propose in a grant proposal or other project application, and that the sponsor accepts – regardless of whether you request salary support for the effort. Commitments are specific and quantified, and they generally are expressed in terms of a percentage of your work time over a given project period.

**Example**

If you indicate in a grant proposal that you will devote 30% of your effort to the grant for one year, and request salary support for 10% of your effort, then:

- The effort commitment is 30%
- Paid effort is 10%
- The cost-shared effort is 20%

A commitment is an obligation that the university must fulfill. Commitments may be adjusted with the approval of the sponsoring agency.

Are effort commitments recognized and tracked for all project personnel?

Commitments are recognized and must be tracked for:

- the principal investigator/project director, and
- all co-investigators, and
- all persons identified as senior/key personnel in the grant proposal.

When the proposal does not explicitly list key persons, the university defines **key personnel** for the purpose of effort reporting as the principal investigator/project director and all co-investigators.

What statements in the proposal form the basis for
commitments?

Requests for salary support and statements about cost-shared effort in the budget or budget justification become binding commitments when the university and the sponsor finalize the award agreement.

When effort proposed in the project description or research plan is specific and quantified, it also becomes a binding commitment at the time the university and the sponsor finalize the award agreement.

Example

"Professor Jones will devote 10% of his time during the academic year to this project."

Even if Professor Jones is not mentioned in the budget or the budget justification, this statement represents a specific, quantifiable commitment to the sponsoring agency.

If a statement in the project description or research plan is not specific and quantified, such as "Professor Jones will provide some assistance as needed to the project," it does not become a binding commitment.

Limits on your total effort commitments to sponsored projects

No one can ever have commitments to sponsored projects that total more than 100%.

Your commitments to sponsored projects can add up to a full 100% only if ALL of your UML job duties can be allocated to sponsored projects. Faculty members generally have academic or administrative responsibilities in addition to their work on sponsored projects. Consequently, a faculty member's commitments to sponsored projects generally cannot total 100% for any consecutive 12-month period.

It is not against the rules for academic staff, classified staff, or postdoctoral researchers to be paid 100% from sponsored projects. There are a number of instances where this is entirely appropriate, given the individual's job duties. However, everyone's allocation of effort to sponsored projects must be reasonable in light of their non-sponsored university activities.

The PI's minimum commitment of effort to a sponsored project

An effort commitment is required of the principal investigator/project director (PI/PD) for every federal and non-federal sponsored project. This includes fixed-price agreements, where the commitment may not be stated explicitly. In such cases, the commitment is implicit in the reimbursement negotiated with the sponsor.

A PI/PD is responsible for the scientific, administrative, and financial management of a sponsored project. Fulfilling these responsibilities requires time. Therefore, for all types of sponsored projects, the PI/PD's minimum required commitment to the project is 1% of his or her effort.

This policy doesn't apply for equipment and instrumentation grants, doctoral dissertation grants, or student augmentation grants. It does apply for the PI/PD on a training grant, but not for the faculty mentors (also known as preceptors or program faculty) as their effort will be assigned to the trainees' specific research projects.
Module 5. The basics of effort certification at UMASS

The remaining modules make several references to the term effort coordinator— an individual that reviews each certification and assists faculty and staff with the process of certifying effort. UML has two primary effort coordinators, the ORA financial administrators. The primary effort coordinators are assisted by sponsored program effort coordinators. The Sponsored Program Effort Coordinators are the PI-specific financial administrators. The primary effort coordinators process the final certification statements for faculty that do not have a designated financial administrator. The Sponsored Program effort coordinators will review and process the final certification statements for the PIs that they support.

Whose effort must be certified?

Effort must be certified for all UML faculty, staff, students, and postdoctoral researchers who either:

1. Charge part or all of their salary directly to a sponsored project, or
2. Expend committed effort on a sponsored project, even though no part of their salary is charged to the project.

Who certifies for whom?

Effort must be certified by a responsible person with suitable means of verifying that the work was performed. This is a federal requirement. It is NEVER acceptable to circumvent this rule.

Each principal investigator certifies the effort for the professional staff, graduate students, postdoctoral researchers, and classified staff who work on his or her research projects.

Sometimes the PI doesn't have a suitable means of verifying the effort for all the people who work on a project - and someone else, like a lab manager, does. In such cases, the PI and the effort coordinator can work together to establish a designee's authorization to certify for project staff members.

Sometimes a staff person works on multiple projects for two or more PIs. In such cases, each PI certifies the staff persons effort related to the PIs particular project(s).

When must effort be certified?

Effort must be certified three times a year.

Each time you certify effort, you do so for a specific period of performance:

- The three periods are (1) January through May; (2) June through August and (3) September through December.

The time during which you certify effort is called the certification window. Each certification window begins a month or more after its corresponding period of performance.

Each time a certification window begins, you have 60 days to certify the effort for the corresponding period of performance.
Recertification

If you think you have certified effort incorrectly, contact your effort coordinator or ORA to ask about recertifying.

Once the last date of the certification window has passed, a subsequent recertification can call into question the reliability of the certification process. Therefore, your request must explain why the effort was erroneously certified, and why the requested change is more appropriate within the context of law, federal requirements, or University policies and procedures. Your written request will be reviewed by the Executive Director, Office of Research Administration. Only in the most compelling of circumstances will it be approved.

How to certify effort

Use the Web-based ECRT system to certify effort for faculty, full-time staff, postdoctoral researchers, and graduate students.

For student and part-time hourly workers, the timesheet serves as the mechanism for certifying effort.

ECRT cannot be used to certify the effort for some individuals. This includes:

- Faculty and staff with zero-dollar, zero-percent appointments
- Some faculty and academic staff members who have left the university

Modules in this course describe how to certify with ECRT. If you cannot certify your effort with ECRT, contact your effort coordinator or ORA with questions about how to certify.

Certifying effort versus certifying payroll

Your effort statement shows, for a specified time period, the sources from which you were paid and the percent of your salary that was charged to each source. This payroll information is an important building block of the effort statement. But it's not the only thing you should think about when certifying your effort.

It would be a mistake to think of the effort certification process as "confirming that this is how you were paid by the university." Remember that when you certify effort correctly, you are providing an assurance to the sponsor that:

- The university's salary charges are reasonable, given the work that was performed, and
- Faculty and staff have met their commitments to sponsors, regardless of whether the university requested salary support for the effort.

For some people, this will require a change of mindset. The next module describes some things to consider when determining your effort distribution and certifying effort.
Module 6. Effort certification guidelines

The effort statement

The image below shows an ECRT effort statement.

The top part of the effort statement shows administrative detail including the name of your Effort Coordinator. Please note that sponsored project financial administrators have also received ECRT training and can be used as a resource for questions.

The next part of the effort statement shows information about sponsored projects. Each line represents a project from which you were paid, or a project to which you might have devoted cost-shared effort.

On the bottom half of your statement, your non-sponsored activities are shown.

Reading across the statement, the six columns are:

<table>
<thead>
<tr>
<th>Column name</th>
<th>What it means</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accounts</td>
<td>For sponsored activity, the fund, project account, abbreviated title and sponsor name is shown.</td>
</tr>
<tr>
<td></td>
<td>For non-sponsored activity, the fund, account number and title are shown.</td>
</tr>
<tr>
<td>Required Effort</td>
<td>The commitment of Effort reflected in the final accepted budget and made a part of the award.</td>
</tr>
<tr>
<td></td>
<td>This field is automatically populated through the PeopleSoft grants module.</td>
</tr>
<tr>
<td>Payroll</td>
<td>Payroll distribution for the certification period. This field is automatically populated through</td>
</tr>
<tr>
<td></td>
<td>the PeopleSoft financial system.</td>
</tr>
<tr>
<td>Cost Share</td>
<td>Cost sharing information for the period of performance. This field is populated through the</td>
</tr>
<tr>
<td></td>
<td>Office of Research Administration.</td>
</tr>
<tr>
<td>Computed Effort</td>
<td>The sum of the payroll percentage and the cost sharing percentage from each line.</td>
</tr>
</tbody>
</table>
How paid effort is represented on the effort statement

Each statement is specific to a period of performance. If the sponsor provided salary support for your effort on a project during the period, you will see a positive number in the Payroll column for the corresponding project. For the purpose of effort certification, sponsored projects include all sponsored activity administered through the Office of Research Administration. The account number always begins with a leading “S”.

If you received salary support from any source other than a sponsored project during the period, you will see a positive number in the Payroll column in the non-sponsored, bottom half of your statement. Non-sponsored activity includes: State Maintenance payroll; Operating Fund payroll; non-sponsored projects, e.g., the Healy grants or CVIP grants.

Cost-shared effort and your effort statement

When you certify your effort, you must include your cost-shared effort up to and including the amount of your cost sharing commitments.

In the example below, the following effort card is displayed at login The sponsored program activity highlighted reflects: Required Effort of 20%; Computed Effort (Payroll Column + Cost Share Column) of 13.48% and Certified Effort of 13%. Assume for this certification period, the Principal Investigator has contributed 20% effort on this project. The difference between the required effort of 20% and the computed effort of 13% is cost-shared effort of 7%.

The revised effort card is shown below. Note that the PI increased certified effort from 13% to 20%. Also note that non-sponsored project effort was reduced from 73% to 67% to reflect the 7% of cost-shared effort attributable to the sponsored program.

Certified: The text boxes are populated automatically to equal the computed effort box. The text boxes may be over-written to allow the PI to enter the effort percentage should the actual effort differ significantly from the percentage shown.

Certify: Check boxes that you must check to certify your effort for each line on the statement.
Committed effort versus extra effort

Perhaps you’ve spent more time on a project than you were paid to spend. Or you’ve put in extra effort, over and above your cost sharing commitment. This is called voluntary uncommitted cost sharing. Any extra effort, above what is stated in the award agreement, is not required to be documented, tracked, or audited. You should not include it in the effort you certify for a sponsored project.

How to determine your effort distribution

Before certifying effort, you should determine your effort distribution. The steps in doing this are:

1. Consider all of your activities for the period of performance.
2. Determine which activities are allocable to your sponsored projects, and which are not.
3. Group your sponsored activities by project.
4. For each sponsored project, determine what percent of your effort for the period you devoted to the project.
5. Adjust non-sponsored activities to accurately reflect cost-shared commitments. If you have multiple non-sponsored activity accounts, the adjustment can be made against the State Maintenance or Operating Fund account.

Remember that effort certification is not an exact science, and you are not required to come up with precise numbers. Reasonable estimates are acceptable. The goal is to be able to explain your activities and so confirm, if asked, that your work justifies the salary charges and meets your commitments to sponsors.

Reasonable estimates and the degree of tolerance

Federal regulations allow for an acceptable variance between the actual effort for a sponsored project and the effort as certified on the statement. At the UML, this variance is defined as five percentage points out of your 100% total UML effort.

Example
to the project. Your effort statement reflects this. Therefore, it is permissible to certify 50% effort for this project if your reasonable estimate of your actual effort is between 45 and 55 percent of your total UML effort.

Why? The federal government expects only reasonable estimates of effort, and allows for a degree of tolerance in certifying effort. And, in fact, certifying this way is not only permissible but the recommended practice.

Assume for a moment that you are paid 100% from sponsored project funds and you have more than a de minimis amount of non-sponsored activity. Does the five percent rule justify certifying 100% of your effort as sponsored effort? The answer is no – it does not create headroom for non-sponsored activities up to five percent of your total UML effort. A certified effort report is your best reasonable estimate of how you expended effort. Everyone acknowledges that an estimate may be slightly off. This is different from knowingly misrepresenting non-sponsored activities as sponsored effort.
Module 7. How to certify your effort with ECRT

Note: *You don't have to remember all of this.* When you're ready to certify, you can refresh your memory with online guides and demonstration videos – easily found from within ECRT itself.

**Step 1. Open your Web browser and go to:** Enter your campus user ID and password. This is the login name/password combination used to access your university email account. In the dropdown menu for campus location choose “Lowell”

**Step 2. On the ECRT Home Page, click the link that says: View Effort Card**
Step 3. To certify your effort:

- View the effort statement.
- Determine your effort distribution for the period. Note: the Effort Distribution must total 100%
- Compare the required effort with the numbers in the **Computed Effort/Certified Effort** columns of the statement.
- For each sponsored project:
  - If your contributed effort for any sponsored project differs from the number in the **Computed Effort/Certified Effort** columns by five percentage points or more, over-write the amount in the Certified Effort column by entering your estimate of the actual effort percentage for that project in the **Certified Effort** column (yellow highlight added for emphasis).
- Click the **Certify Checkboxes** (blue highlight added for emphasis) button.
- Click “Certify My Effort” button to complete.

Your statement will be forwarded to your effort coordinator for final processing. Please note that all certification data must be entered as a whole number (i.e. 10).
Module 8. How to certify effort for your project staff with ECRT

Note: *You don't have to remember all of this.* When you're ready to certify, you can refresh your memory with online guides and demonstration videos – easily found from within ECRT itself.

**Step 1. Follow the same initial step to login as shown in Module 7.** At the screen that says “Welcome to ECRT” click Continue.

**Step 2.** Find and click the link that says: Certify my Researcher – Group View.

**Step 3.** The next page(s) provide individual effort cards for each person who works on a sponsored project for which you are the PI. Please review the list to be sure it is correct. Please contact your Effort Coordinator if it is not.

The next actions are just like the ones for certifying your own effort. They are:
- View the effort statement.
- Determine effort distribution by person for the period (must total 100%).
- Compare the required effort with the numbers in the **Computed Effort/Certified Effort** columns of the statement.
- For each sponsored project:
  - If your contributed effort for any sponsored project differs from the number in the **Computed Effort/Certified Effort** columns by five percentage points or more, over-write the amount in the Certified Effort column by entering *your estimate of the actual effort percentage for that project* in the **Certified Effort** column.
  - Click the **Certify Checkboxes** button.
  - Scroll to end of page and click the “Certify All” button.

In the example provided below, please note the blue highlighted rows that indicate that the activity (sponsored or non-sponsored) cannot be certified by you as you are not the PI for the project. You are only required to certify the activity for which you are responsible.

<table>
<thead>
<tr>
<th>Accounts [ ]</th>
<th>Required Effort</th>
<th>Payroll</th>
<th>Cost Share</th>
<th>Computed Effort</th>
<th>Certified Effort</th>
<th>Certify Checkboxes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sponsored</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>52102-S11108810000008</td>
<td>0.00%</td>
<td>17.35%</td>
<td>0.00%</td>
<td>17.35%</td>
<td>17%</td>
<td></td>
</tr>
<tr>
<td>53102-S51110000009657</td>
<td>0.00%</td>
<td>19.78%</td>
<td>0.00%</td>
<td>19.78%</td>
<td>20%</td>
<td></td>
</tr>
<tr>
<td>53412-S23010040000008</td>
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<td>8.52%</td>
<td>0.00%</td>
<td>8.52%</td>
<td>9%</td>
<td></td>
</tr>
<tr>
<td>53412-S5111000000837</td>
<td>0.00%</td>
<td>45.65%</td>
<td>0.00%</td>
<td>45.65%</td>
<td>40%</td>
<td></td>
</tr>
<tr>
<td><strong>Sponsored Total:</strong></td>
<td>0.00%</td>
<td>45.65%</td>
<td>0.00%</td>
<td>45.65%</td>
<td>40%</td>
<td></td>
</tr>
<tr>
<td><strong>Non Sponsored</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>52129-L610700427-E00 Research Administration - None</td>
<td>0.00%</td>
<td>0.01%</td>
<td>0.00%</td>
<td>0.01%</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td>52129-L610700466-E00 Research Administration - Research</td>
<td>0.00%</td>
<td>54.34%</td>
<td>0.00%</td>
<td>54.34%</td>
<td>54%</td>
<td></td>
</tr>
<tr>
<td>52129-L610750054-E00 Research Administration - Research</td>
<td>0.00%</td>
<td>0.01%</td>
<td>0.00%</td>
<td>0.01%</td>
<td>0.0%</td>
<td></td>
</tr>
<tr>
<td><strong>Non Sponsored Total:</strong></td>
<td>0.00%</td>
<td>54.36%</td>
<td>0.00%</td>
<td>54.36%</td>
<td>54%</td>
<td></td>
</tr>
<tr>
<td><strong>Grand Total:</strong></td>
<td>0.00%</td>
<td>100.01%</td>
<td>0.00%</td>
<td>100.01%</td>
<td>100%</td>
<td></td>
</tr>
</tbody>
</table>
Module 9. Managing effort while working on your projects

The emphasis thus far has been on preparing you to certify effort. Now we want to highlight some additional important issues. In this module we explore the interplay between your effort commitment, your actual effort, and your salary charges during your work on a project. Six key principles are:

1. You are required to fulfill your effort commitment for each sponsored project budget period.
2. During a sponsored project budget period, your actual level of effort may vary.
3. Except for short term fluctuations, your salary charges must be consistent with your actual effort.
4. If you wish to change your commitment, you must always document the change and in some circumstances you must obtain prior written approval from the sponsor.
5. If you maintain your commitment level and your actual effort but reduce your salary charges to the grant, you must document this increase in your cost-shared effort.
6. If you receive an award from the sponsor and the budget is significantly less than you proposed, you must decide how you will conduct the project and then confirm this with the sponsor – because the sponsor does not assume a proportional reduction of effort commitments.

This information is intended primarily for PIs, but the principles are important for all certifiers.

Effort variations within a sponsored project budget period

During the course of a sponsored project budget period, your level of effort may vary. This is acceptable, as long as you fulfill the overall commitment for the entire budget period.

Example

If you have committed 30% of your effort to a project during a calendar year budget period, one way you could fulfill that commitment is by expending:

- 10% effort during the first 4.5 months of the year
- 90% effort during the summer and,
- 10% during the last 4.5 months.

When does a variation in effort require an adjustment to the salary charges?

You must charge salary and certify your effort in a manner that is consistent with how you actually devote effort to the project. In the example above, where you work 10% in the first four ½ months; 90% during the summer and 10% in the last four ½ months – a perfectly acceptable way to fulfill the commitment – it would not be acceptable to:

- Charge salary at a constant 30% rate for the entire budget period, or
- Certify effort at a constant 30% rate for the each certification period

However, short-term fluctuations of two months or less are acceptable. This would be an effort deficit of not more than two months, provided that the catch-up occurs within a comparable period and it all evens out.
When does a change in effort require prior approval from the sponsor?

The rules depend on the type of change and your role on the project. First, the federal government defines a significant change in work activity as:

- A 25 percent (or greater) reduction in the level of committed effort
- An absence from the project of three months or more
- A withdrawal from the project

For a principal investigator/project director or key person as listed in the Grant Award:

- A significant change in work activity requires prior approval in writing from the sponsor's Grants Officer. It is not okay to just communicate the change to your Program Officer.
- Any other change in your level of committed effort must be documented and communicated to the sponsor.

**Example**

Your committed effort is 40%, and you want to reduce it to 30%. The drop is 25 percent of your original effort commitment, so it requires prior written approval from the sponsor.

For a key person as identified in the proposal who is not listed in the Grant Award:

- Any change in your level of committed effort must be documented.

For individuals who are not key personnel, commitments are not recognized and changes to effort levels need not be documented or communicated to the sponsor.

**Changing the salary charged to a sponsored project**

PIs generally have some flexibility in managing their sponsored project budgets, including their salary charges for project staff. However, this rebudgeting authority does not confer the right to:

- Make significant changes in work activity without prior approval from the sponsor, or
- Change effort commitments for key personnel without documenting the changes.

Furthermore, if you reduce a person's salary charges without changing the effort commitment, that's an increase in cost sharing and should be documented as such.

Taken together, the rules regarding changes to salary charges and commitment levels are somewhat complex. They're summarized below, but you don't need to memorize them; the specifics are always available on the ORA Web site. For a significant change in work activity, documenting the change means communicating it to ORA after getting the sponsor's approval. For all other changes, documenting means maintaining a written or emailed record at the department level.

For an investigator or key person:

<table>
<thead>
<tr>
<th>If you want to:</th>
<th>Then you must:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduce the salary charges without changing the effort commitment</td>
<td>Document as cost sharing the effort for which the sponsor will not provide salary support</td>
</tr>
<tr>
<td>Reduce both the salary charges and the effort commitment by less</td>
<td>Document the change to the commitment level</td>
</tr>
</tbody>
</table>
than 25% of the original commitment level

| Reduce both the salary charges and the effort commitment for a key person as listed in the grant by 25% or more of the original commitment level | Obtain approval from the sponsor prior to the change and in writing, and document the change to the commitment level when approved |
| Reduce both the salary charges and the effort commitment for a key person listed in the proposal but not in the grant by 25% or more of the original commitment level | Document the change to the commitment level |

For a project staff member who is not an investigator or key person:

<table>
<thead>
<tr>
<th>If you want to:</th>
<th>Then you must:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduce the salary charges without changing the effort</td>
<td>Document as cost sharing the effort for which the sponsor will not provide salary support</td>
</tr>
<tr>
<td>Reduce the salary charges and the effort by commensurate amounts</td>
<td>No documentation, notification, or approval is required</td>
</tr>
</tbody>
</table>

When the awarded budget is less than proposed

If you receive an award from a sponsor and the budget is less than you proposed, you cannot assume that your effort commitments are automatically reduced by a proportionate amount. You may need to confirm the effort commitments and the arrangements for salary support with the sponsor.

You have three options:

1. Reduce the effort commitments in proportion to the budget reduction. With a budget reduction of 25% or more, you must request approval from the sponsor for this option. A reduction of that magnitude (10% or greater on an NSF award) generally indicates a project scope reduction, so a proportionate reduction of effort commitments would be appropriate.
2. Keep the proposed effort commitment and salary arrangements, and reduce expenditures in non-salary budget categories.
3. Keep the proposed effort commitments but reduce the salary charges. This increases the university's voluntary cost sharing for the project, and must be explicitly approved in accordance with your college or school's policies on cost sharing.

No-cost extensions

The terms and conditions of your award apply throughout the project period, including a no-cost extension period. This includes the PI's effort commitment. At the same time, federal agencies realize that PI effort may be reduced during no-cost extensions as the project is winding down, or when data analysis requires additional time.

While this is not considered a change in scope, it is in the best interests of the institution and the PI to notify the sponsor of this decrease in effort to avoid discrepancies with current and pending support statements, effort certification, or issues of research overlap.
10. Course Wrap-Up

10.1. Congratulations!

You've reached the end of this training course. If you passed all the quizzes, you're done; there's nothing more you need to do, except certify effort. The quizzes are designed to reinforce the learning objectives of the chapters. If you didn't pass one of the quizzes, please retake the quiz after reviewing the corresponding chapter.

To determine whether you have passed all the quizzes, you can return to the CITI "gradebook" or table of contents for this training course.

If you'd like to keep a copy of this training material for your reference, a printer-friendly version is available from: http://www.uml.edu/ora/Time_%26_Effort.html

10.2. Your next steps

Once you complete this course, you're ready to certify your effort – and the effort for your project staff. Before doing so, you may wish to refresh your memory about your activities. You can log into ECRT and view an effort statement at any time, without having to certify. From the effort statement, you can view a summary of each sponsored project. The summary page shows the project's start and end dates and a list of the people with paid or cost-shared effort on the project.

10.3. Where to go for additional information

The Time & Effort page on the UML Web site contains links to many helpful resources.

The information you'll find there includes:
- the university's policy on effort certification
- answers to frequently asked questions
- presentations on selected topics

If you have questions, you might wish to contact one or more of the following:
- Your effort coordinator
- Your financial administrator

10.4. Where to go for help

Your effort coordinator is always the first place to go for assistance. In ECRT, your effort statement contains a link to your effort coordinator's email address. Click this link to compose and send an email message to your effort coordinator.