



EFFORT REPORTING

DECEMBER 2014

Introductions and Topics

- Introductions / Training process
- Federal requirements under OMB A-21
- Basics of effort certification
- Why do we Certify Effort?
- The SUNY Research Foundation e-Cert System

Effort Policy and System Operations– <u>Outreach/Training</u>

Academic Senior Administrators

- Executive & Academic Management (Dean's & Vice Presidents)
- Advisory Council on Research
- Chairs Faculty meetings

Department Administrators

- Targeted training of College/School administrators
- Distribution and training of Standard Operating Procedures

Faculty Outreach

- RF Grant Manager sessions with faculty (planning,)
- Small group faculty meetings



Time & Effort Requirements

- A-21, §J.10 prescribes
 - Criteria for acceptable methods for payroll distributions
 - Examples of acceptable methods
 - Salary rates for faculty members
 - Period outside the academic year salaries (e.g. summer)
- NIH Grant Policy Statement payments for dual appointment
- PHS 398 definition of the Institutional Base Salary
- DS-2, Subparts 2.4, 2.5 and associated continuation sheets
- Time & Effort policy & procedures

Applicable Section of A-21

- The system will reflect categories of activities expressed as *a percentage distribution of total activities*. (§J.10.c.(1)(b), *Plan-Confirmation*)
- These reports will reflect an after-the-fact reporting of the percentage distribution of activity of employees (§J.10.c.(2)(b). *After-the-fact Activity Records*)
- Personal activity] reports will reasonably reflect the activities for which employees are *compensated by the institution*. (§ J.10.b.(2)(a)(ii))

Applicable Section of A-21 (Continued)

- ➢ Charges for work performed on sponsored agreements will be based on the individual faculty member's *regular compensation* for the continuous period which, under the policy of the institution concerned, constitutes the basis of his salary. " (§ J.10.d.(1))
- The distribution system must "conform to the *existing policies* of the institution, consistently applied." (§ J.10.a.)

What is effort certification?

- Method to ensure that salary being paid from an award aligns with the work being done on the award
- A process to show that time committed to a project is actually performed as committed
- A method to establish documented records to link salary distribution to the certification.

What is effort certification?

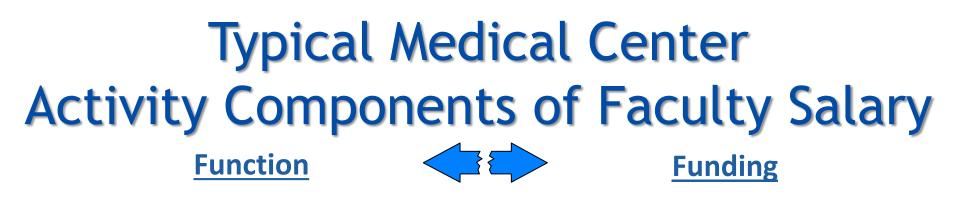
• Effort is usually expressed as a percentage



- Certification forms will normally show the payroll percent along with the effort percent
- These forms are then either signed on paper(biweekly RF Staff) or certified electronically.

100% of What?





- Instruction/Dept. Research
- Organized Research
- Cost Sharing
- Patient Care
- Hospital Administration
- Graduate Medical Education
- > Other Academic Activities

- ➤General Funds
- ➤Grants & Contracts
- ➢ FPP Professional Fees
- Hospital Contracts
- ➤GME Hospital Transfers?
- ➤Endowment & Gifts

Standard Faculty Compensation: X-Y-Z Concept

X	Υ	Z
Academic Base Salary Component	Clinical Base Salary Component	Incentive <u>Component</u>
General Fund	Professional Fees	Professional Fees
Tuition Grants/Contracts Endowment Funds Other	Capitation Income Third Party Income State Service Contracts	Capitation Income

Payments for Dual Appointments

- For investigators with university and clinical practice plan appointments, compensation from both sources may be considered the base salary if the following criteria are met:
 - Clinical practice compensation must be guaranteed by the university;
 - Clinical practice effort must be shown on the university appointment form and must be paid through the university; and
 - Clinical practice effort must be included and accounted for on the university's effort report.

Why do we certify effort?

- Certification provides a "record" that validates work was performed in accordance with the charges
- Additionally, the certification process helps to ensure that costs are:
 - Allowable
 - Allocable
 - Accurate
 - Consistently applied

Expressed As a Percentage

Time spent on one particular activity

Divided by

Time spent on all activities for which an individual is compensated by their IBS

Sponsored Agreements: Research, Training, Other Sponsored Activities Non Sponsored Activities: Teaching, Instructional, Department Research, Administration, Public and Community Service, Clinical

This is the **basis** for projecting effort or certifying effort. **This is what constitutes 100% effort**

= X %

Effort Commitments

- When a proposal is submitted, effort is committed for key personnel
- The amount of commitment that is on the final award needs to be met
- For federal awards, this committed amount should not be reduced by 25% or more without agency approval (§200.308.c.3)
- Effort certification process should allow you to compare committed effort to payroll distribution percentage.

Effort Percent

- 100% Effort = Total Time Estimated for all university activities, i.e., only those activities compensated by the Institutional Base Salary
- Excluded from effort reporting is any compensation received from sources other than the Institution
- 100% Effort ≠ 40 hours ≠ 60 hours ≠ 10 hours, etc.
- No fixed work week

Effort Verification - Sample Questions

- Are all of my <u>current active awards</u> <u>represented</u> in my effort plan?
- What effort do I <u>need to apply on each grant</u> <u>during the remaining time of the budget</u> <u>period to meet my effort commitment</u>?
- Are there any <u>compliance issues</u> e.g. overcommitments, internal maximum thresholds?
- Do I need to obtain <u>prior approvals</u> from sponsors or <u>notify Principal Investigators</u> on effort commitment reductions?

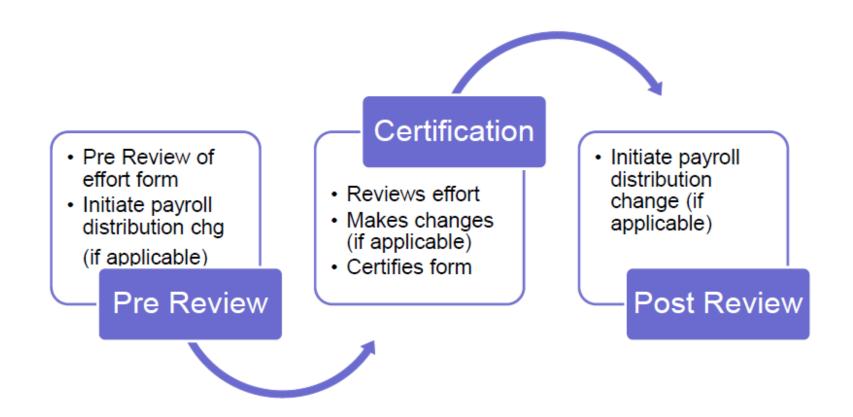


Effort Verification - Sample Questions

- Will I have an <u>effort commitment</u> for <u>upcoming</u> <u>no-cost extension</u> requests?
- What are my <u>future effort plans</u> e.g. likely proposals to be awarded?
- <u>Are payroll distribution changes required</u> to account for actual/planned effort including cost share?



Certification Process



Committed Effort Management/Tracking

- Organize <u>effort commitments into a plan</u> for faculty/staff
- <u>Increase</u> effort compliance <u>awareness</u> of faculty/staff
- Provide information in a <u>meaningful way for faculty</u>
- Resolve effort compliance issues <u>during mid-year effort</u>
 <u>certification</u>
- Compare effort plan with actual payroll distribution results
- <u>Facilitate workload planning</u> between Chairs & faculty
- <u>Decrease</u> retroactive payroll distribution transfers



Semi-Annual Effort Certification/Verification Process

Using the basic effort reporting questions above the faculty member would review each project account and validate their effort or make necessary adjustments.



Institutional Base Salary

- The annual compensation that the applicant organization pays for an employee's appointment, whether that individual's time is spent on research, teaching, patient care, or other activities.
- Base salary excludes any income that an individual may be permitted to earn outside of duties to the applicant organization. (excludes "Temporary Also Receives" payments)
- Base salary may not be increased as a result of replacing institutional salary funds with grant funds.

NIH Salary Cap

- A Salary Cap -- is a maximum annual rate of salary for fulltime effort that can be charged to an agency's award and is applicable only to <u>direct charges</u>
 - Amounts charged to both NIH grants and to cost sharing cost centers
- NIH salary caps are indexed to a specific Government Executive Pay Level.
 - The salary for the Executive Pay Level may vary for each Government Fiscal Year in which the funds are awarded.



NIH Salary Cap (continued)

- A **Funding Limitation** is defined as the limitation on the annual rate of salary for full-time effort that the agency provides in a given award.
 - This limit is usually established at the time of a competitive award based on the salary cap in effect at the time.
- However, if, after a competitive award is made, the NIH announces an increased Salary Cap, the agency will allow PIs to re-budget awarded funds, in that or future years, to charge the higher salary level.
 - NIH has not historically provided additional funds for this purpose.

NIH Salary Cap (continued)

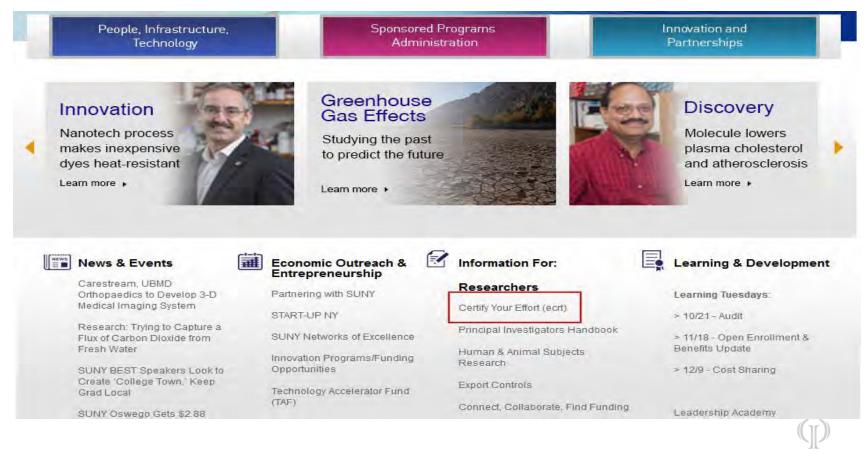
- The salary over the cap <u>cannot</u> be treated as cost sharing to federal grants.
 - It must be treated as **unallowable costs**.

Addendum

• How to navigate the SUNY Research Foundation's e-Cert System.

Navigate to the RF Homepage

- Navigate to the Research Foundation (RF) homepage at <u>http://www.rfsuny.org</u>
- Select the "Certify your effort (ecrt)" option.



Login Navigation

• Click on the "Log-in to Effort Reporting and Certification Technology (ecrt)".



Login Navigation (cont.)

• Click on the SUNY RF logo



Based on your campus location, choose one of the below options to log in to the Effort Certification and Reporting Technology (ecrt).

> Access ecrt overview and training materials

Log In Through Your Campus Website

If you are at a campus listed below, access ecrt by clicking your logo.



Log In Through the RF Website

If you are at a campus location other than the campuses listed to the left, log in to ecrt by clicking the RF logo.



Work List: The ecrt Home Page

• The **Work List** provides access to the effort statements that need certification. Navigate **ecrt** using the tabs across the top of the screen (indicated by the red box)

SUNYRF				SU	NY Dow	nstate	Medical	Center			Welcome, Sign Out
	Home	Certify	Manage	Reports	Administration	Links					
Training Principal Investigators Proxy Certifiers Restricted Effort Coordinators Administrators		e ecrt effort reporting :	system. The tabs below elect the link in the task		ertification tasks that req	uire your attention -	whether it is certifying s	tatements, processing stater	nents, or following up on	outstanding statements. To	The Effort Likeysis
Additional Resources	Stater	nents Awaiting Ce	rtification (0)								
 How to Certify Your Staff Campus Periods of Performance Acceptable Percentage Range for Effort Certification Why are there 0 Percentages in the Certificed Effort Column on my Effort Statement? Effort Statement Statuses Glossary of Terms Regulations OMB Circulars National Institutes of Health: Grants Policy and Guidance 	Statement O	wner			Department			Due Date	Туре	Status	PI
	There are no	Effort statements ass	ocialed to you.								

Certify the Effort of Research Staff

• Access an effort report statement by either: 1) Clicking a name under the **Statement Owner** column or 2) Clicking a "Ready to be Certified" icon under the **Status** column

SUNY (RF		Research Found	lation for SUN	IY	Welcome,	Sign Out
	Home	Certify	Reports	Administration	n Links)	
PI Training * Introduction to the Effort Reporting Electronic Tool * Certify My Effort	attention - whe view and resolv	e ecrt effort reporting stat	system. The tabs below I tements, processing state elect the link in the task d ertification (3)	ements, or following u			
 Certify My Effort and the Effort of My Staff Effort 	Statement C		Department	mputer Science and	Due Date Type 8/31/2012 Base	Status	PI
Reporting Essentials			2.13.1001113		11/16/2012Base	Building, Not Ready Certification	for
PI Reference			Engineering	nputer Science and	8/31/2012 Base	Ready to be Certified	•
» PI Glossary of Terms » PI Effort Statement Statuses							
Reference Material							

Certify the Effort of Research Staff (cont.)

- To certify statements one at a time click an individual's name in the **Work List**.
- To certify all the individuals click the checkmark icon (highlighted).
- The selected statements will display below the work list.

Active	T
Lee, Pham	600 Computer Science and Engineering
Ruelas, Alisa	600 Computer Science and Engineering
Tan, Mary	600 Computer Science and Engineering

Certify the Effort of Research Staff (cont.)

- Review the effort statement(s).
- For the displayed effort statement(s) click the checkbox for each award line or click the All link and then click Certify.
- Read the certification attestation statement and click **I Agree** to affix your electronic signature.
- Click **OK** to confirm on the pop-up window.
- The effort certification is complete.

Effort Statement for [] (Downstate SUNY-Monthly); Base effort, from 07/01/2014 to 12/31/2014; Status: Building, Not Ready for Certification					
INFO - This Effort Statement cannot be certified because it is in the Building, Not Ready for Certification status.					
P 🗈 🔁				On Hold	S Value
Awards [-]	Salary	Cost Share	Total	Certified	Certify
	Charges	Charges	Charges	Effort	Overally
Sponsored - Federal Federal Flow-through					
Initiative	5.91%	0.00%	5.91%	0 5.91 %	
Award Total				and the state	
	5.91%	0.00%	5.91%	5.91%	
Women	6.67%	0.00%	6.67%	0 6.67 %	
Women					111
Award Total	6.67%	0.00%	6.67%	6.67%	
Project	0.00%	2.95%	2.95%	0.000	1771
Cost Share				2.95 %	
Award Total	0.00%	2.95%	2.95%	2,95%	
2014					-
2014	6.05%	0.00%	6.05%	6.05 %	
Award Total	6.05%	0.00%	6.05%	6.05%	
Program					
Program	25.00%	0.00%	25.00%	25.00 %	
Award Total	25.00%	0.00%	25.00%	25.00%	
Sponsored - Federal Federal Flow-through Total:	43.63%	2.95%	46.58%	46.58%	
Non Sponsored					
000261 100 Other Institutional Activities	50.68%	0.00%	50.68%	3 50.68 %	
64634 RF Allocation Reserve Account FY 2013-2014	2.74%	0.00%	2.74%	2.74 %	
Non Sponsored Total:	53.42%	0.00%	53.42%	53.42%	-
Grand Total:	97.05%	2.95%	100.00%	100.00%	<u>/</u> Nor
Get Help			Close	Save No Cert	fication Require