

University of Massachusetts at Amherst

Principles of Effort Reporting

Introduction

The purpose of this guide is to provide an understanding of the basic principles of effort reporting. UMA has implemented an on-line version of effort reporting, called ECRT for better control and compliance with this important regulation. ECRT will be the vehicle by which all key personnel on grants and contracts will certify their effort beginning in the fall 2009 for the previous fiscal year's activity.

The federal government has established the principles of effort reporting as the basis to ensure that the amount of salaries paid for corresponds to the actual effort spent on its programs. The government recognizes that time spent on grants and contracts is not always easily identified or quantified given the differing workloads of faculty and the inextricable mix of teaching research and other duties. Therefore, the government has adopted the following method of effort reporting in lieu of more onerous and detailed time keeping systems used in other industries.

Since salary and related fringe benefits represent a majority of all federal research funding, the government expects a high degree of compliance with these principles and many universities have paid multi-million dollar fines for non-compliance. Effort reporting remains a focus of all federal audits and investigations. A failure to propose, manage, and certify effort correctly could jeopardize the university's federal funding and lead to penalties for the university.

Basic principles of effort reporting

1. 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- regardless of when and where those duties are performed.

Effort certification involves certifying the percentage of your total UMASS effort devoted to a sponsored grant or contract in comparison to the percentage of your total compensation charged to the grant during the certification period. In essence, your total university effort is viewed as a pie-chart and the amount devoted to the grant as a slice representing a percentage of total effort dedicated to the grant.

2. What is effort certification?

Effort certification is the process by which faculty certify that the amount of salary charged to a sponsored program, expressed as a percentage of total salary, reasonably represents the percentage of total effort spent on the program during the certification period. Faculty will be presented with the percentage distribution of their salary as charged to all funding sources during the period and will certify the following statement:

I certify the salary charged, salary transfers processed and effort certified this period reasonably reflect the work performed in the designated period, and that I have sufficient technical knowledge and/or I am in a position that provides me with suitable means of verification that the work was performed.

3. Whose effort must be certified?

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

- Charge part or all of their salary directly to a sponsored project-see Appendix A for what activities may be charged to federal grants
- Expend *committed* effort on a sponsored project, even though no part of their salary is charged to the project-see Appendix B for definition of commitments.

Each principal investigator certifies the effort for the professional staff, graduate students, postdoctoral researchers, and classified staff who work their research projects. Sometimes a staff person will work on multiple projects for two or more PIs. In such cases, each PI certifies the staff person's effort related to the PIs particular project(s).

Effort must be certified by a *responsible person with suitable means of verifying* that the work was performed. This is a federal requirement.

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

4. Some important considerations about effort certification:

- Faculty must certify their own effort and are not allowed to delegate the responsibility to any other person.

- You only need to certify effort up to the amount committed on the grant. Effort devoted beyond what has been committed in the grant proposal and award is voluntary and need not be certified.
- Committed cost share amounts need to be certified. See below for more details on cost sharing.
- Once the effort is certified, it may not be changed retroactively. Therefore all cost transfers or other adjustments must be processed before or in conjunction with the effort certification period.
- Effort certification is not an exact science. Sponsors recognize that research, teaching, service, and administration are often inextricably intermingled. Reasonable estimates are all that is expected.

5. What if the percentage of salary does not reflect the amount of effort?

- ECRT will show all funding sources of a faculty member's compensation including amounts paid from non-sponsored sources such as State, GOF, RTF, Gift and others on the effort card (example below). The percentage distribution of salary to these non-sponsored should be viewed and certified in total.
- If the percentage of salary charged directly to a grant does not reasonably reflect the percentage of effort spent on the project, the salary must be adjusted through a Personnel Action Form, or cost share adjustment if applicable. Department administrators will need to prepare and reconcile these adjustments in ECRT.
- Cost Share information will be provided to departmental administrators for addition to effort cards prior to P.I. certification.
- Sample ECRT Effort Card:

View Period: 07/01/2008 to 06/30/2009

To certify your effort, type the percent of effort that you worked on each activity during the certification period in the box provided. Then click each of the certify checkboxes and press the Certify button. Your certification statement needs to be certified and then approved for processing by your effort coordinator. Finally, all certification data must be entered as a whole number (i.e. 10).

Accounts [-]	Payroll	Cost Share	Computed Effort	Certified Effort	Certify Checkboxes
Sponsored					
53404- S18220000000030 Private - CUMIRP Part IV: Kuraray Americ - KA INC	9.54%	0.00%	9.54%	<input type="text" value="10"/> %	<input type="checkbox"/>
Sponsored Total:	9.54%	0.00%	9.54%	10%	
Non Sponsored					
51006-A090700000-A01 Tuition Retention - Instruction- Instruction	90.46%	0.00%	90.46%	<input type="text" value="90"/> %	<input type="checkbox"/>
Non Sponsored Total:	90.46%	0.00%	90.46%	90%	
Grand Total:	100.00%	0.00%	100.00%	100%	All None
Need Assistance		Save to Complete Later Certify Do Nothing			

6. What is the definition of UMass Amherst Effort?

Because you must certify 100% of your effort, it's important to know what counts as effort and what doesn't.

Your UMass Amherst 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 exclusive of continuing education
- 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 UMass Amherst professional duties
- Outreach activities that directly relate to UMass Amherst professional duties
- Paid absences, including vacation time and sick leave

Specifically, it **excludes** the following:

- Compensation from received from non-UMass Amherst entities
- Consulting outside of UMass Amherst
- Amounts paid for Continuing Education activities
- Amounts paid as bonuses, retroactive contractual salary increases paid after the certification period is closed
- 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 UMass Amherst effort
- Lectures or presentations for which you are compensated by a source other than UMass Amherst
- Unpaid absences

7. Summer Research Effort for Nine-Month Faculty

The principles of effort certification apply to the summer period as follows:

- Nine month faculty have a maximum of two and a half months of effort that can be charged to federal sources during the summer period.
- Two and a half months summer effort is represented as 28% of the nine-month base salary.
- A faculty member who charges the maximum two and a half months effort to federal grants may engage in non-sponsored activities as defined in Appendix A during the same time period for the remaining two weeks.
- A faculty member who charges the maximum two and a half months engaging in non-sponsored activities during the summer that exceeds the two weeks must reduce the amount charged to federal sources by a corresponding amount proportionate to the effort spent on these activities.
- Faculty receiving nine-month administrative stipends for additional non-sponsored duties may not charge 28% of the stipend to federal sources during the summer.
- Charging grants during the summer for effort contributed during the academic year is not allowable.

8. When must effort be certified?

- Effort must be certified annually.
- The period of performance is July through June.

- Once the system is available for certification you will have approximately 60 days to certify the effort for the period. You will be notified by email of the actual due date.

9. Re-certification

Any subsequent changes to a certified effort report calls into question the reliability of the certification process. Retroactive salary cost transfers will impact the effort percentages previously certified and require a re-certification. A written request must explain why the salary was not charged timely and the impact on the previous effort certification. Only in the most compelling of circumstances will it be approved. If effort has been certified incorrectly, contact your effort coordinator or ORA to ask about re-certifying.

10. How to certify effort

Effective July 1, 2009 all effort must be certified electronically by faculty charging salary to sponsored programs through the Web-based ECRT system. A separate job aid and training on how to process effort certifications in ECRT will be provided to department administrators and faculty. More information may be found at

<http://www.umass.edu/af/systems/fca/ecrt.htm>

or call (413) 545-2119 for Help Desk support.

Appendix A: What activities can be charged to federal grants?

The federal government is very specific regarding the activities that are allocable and can be charged to sponsored projects. When determining your effort distribution, you must distinguish between activities that are allocable to federal projects and those that are not.

Here are some specific activities that **can** be charged to federally 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

Here are some specific activities that **cannot** be charged to a federal grant:

- Proposal-writing, except for non-competing continuations (progress reports), including developing necessary data to support and submit 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, faculty committee or other similar group
- Course or curriculum development not specific to your research project
- Writing textbook chapters
- Fundraising

Appendix B: Commitments to sponsored projects

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 it is paid by the sponsor or provided as cost share by the university. A commitment is an obligation that the university must fulfill and must be certified annually in ECRT. There are two types of effort:

Paid effort is work for which the sponsor provides salary support.

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

Any commitments made about effort for senior/key personnel in the grant proposal in a proposal or award must be certified in ECRT. 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.

Key personnel sometimes devote more time on a grant than is committed. This is commonly referred to as voluntary un-committed cost share (VUCS). Faculty need not certify or adjust their percentages pertaining to this type of effort.

What statements in the proposal form the basis for commitments?

Commitments are specific and quantified and generally are expressed in terms of a percentage of work time or a specified amount of salary over a given project period.

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.

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. ***This is considered voluntary uncommitted cost sharing and should not be certified in the effort reporting system.***