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University of Massachusetts at Amherst

Principles of Effort Certification

Introduction

Salary and related fringe benefits represent a majority of all federal research funding. The government recognizes that identifying time spent on grants and contracts is not always easy given the inextricable mix of teaching, research and other duties for which faculty are responsible. Therefore, the government has accepted effort certification in lieu of more detailed time keeping systems used by other industries as a basis to ensure the amount of salaries paid on sponsored projects reflects the actual compensated effort spent on those projects.

Effort certification remains a focus of federal audits and investigations and many universities have paid multi-million dollar fines for non-compliance. A failure to propose, manage, and certify effort correctly could jeopardize the university's federal funding and lead to penalties for the university.

What is effort certification?

Effort certification is the process by which Principal Investigators (PIs) certify that the amount of salary charged and/or cost shared to a sponsored project reasonably represents the percentage of total effort spent on the project during the certification period. Effort certification is not an exact science, nor is it based on a 40-hour workweek. Sponsors recognize that reasonable estimates are all that is expected.

An effort card shows the distribution of salary charged to all funding sources during the fiscal period as a percentage of the total annual salary. Any salary expensed to cost share companion accounts appears on the effort card and certified at the same time as sponsored effort. Non-sponsored funds are rolled up and certified in total. The effort card is certified when the salary distribution is reviewed and the following statement is agreed to:

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. I further certify that the amount of certified effort is commensurate with the effort commitment to the sponsored project for this period.

PIs only need to certify effort up to the amount committed in the award document. Effort devoted beyond that is voluntary and should not be reported or certified.

If the percentage distribution of salary on the effort card does not reasonably reflect the percentage of effort spent on the projects, a Personnel Action Form must be submitted to adjust the salary. Contact the department effort coordinator to get any corrections completed as soon as possible.

Definitions of UMass Amherst Effort

University compensated effort **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 academic effort exclusive of continuing education
- Administration, including the roles department chair, director, or dean
- Service on institutional and governance committees such as IRBs, IACUCs,
- Effort 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

University compensated effort **excludes** the following:

- Consulting, lectures, presentations, peer review of manuscripts, advisory activities, or leadership in professional societies for non-UMass Amherst entities regardless of any compensation received for those activities
- Amounts paid for Continuing Education activities
- Amounts paid as bonuses or retroactive contractual salary increases paid after the certification period is closed
- Volunteer public service not directly related to UMass Amherst efforts
- Unpaid absences

Certification Responsibilities

Effort must be certified for all UMass Amherst faculty, staff, students, and postdoctoral researchers who have salary charged to a sponsored project or to a sponsored project cost share fund.

Effort must be certified by a ***responsible person with suitable means of verifying*** that the work was performed. Therefore, PIs must certify their own effort and cannot delegate the responsibility to another person. Additionally, each PI certifies the effort of any professional staff, graduate students, postdoctoral researchers, and classified staff who work on their research projects. Sometimes a staff person will work on multiple projects. In such cases, each PI certifies the staff person's effort related to the PIs particular

project(s). In the event that a PI is not available to certify because they have left the university, a designee should certify on their behalf.

Effort Certification Timing

Effort certification is completed annually. The period of performance (when the effort was expended) is the University's fiscal year, July 1st through June 30th. The effort reporting period (when certifications are completed) occurs in the fall semester following the end of the fiscal year and is open for 45 days. Opening, reminder, and closing emails are sent to all certifiers during the effort reporting period.

Re-certification

Any subsequent changes to a certified effort report calls into question the reliability of the certification process. Retroactive salary cost transfers impact previously certified effort percentages and require re-certification. If effort was incorrectly certified, contact the effort coordinator to ask about re-certifying.

Job aids, training and support on how to complete effort certifications can be found at <http://www.umass.edu/afsystems/effort-reporting>.