

TIME AND EFFORT CERTIFICATION PROCEDURE

Requirements for Time and Effort Certification

Federal regulations require recipients of Federal funds to maintain an accurate system allowing for periodic certification of effort devoted to specific activities. This is a requirement of 2 CFR Part 220 (as codified from the Office of Management and Budget (OMB) Circular A-21) and Section J.10 of OMB Circular A-21 (Attachment I). Award recipients, like the University of the District of Columbia (UDC), must exercise due diligence in the review of periodic effort reports to ensure reasonableness in charging salary/wage costs to external sponsors, to formally document fulfillment of cost-share commitments, and to certify this effort in the context of all the work each individual does. UDC uses the after-the-fact confirmation method.

OMB Circular A-21 recognizes that in an academic setting, teaching, research, service and administration are usually inextricable intermingled. Thus, effort reports are permitted to rely on estimates in which a degree of tolerance is allowed.

Implementation Procedure:

The University of the District of Columbia assures that effort expended on sponsored activities justifies the salaries charged to those projects by requiring periodic effort reports for each individual for whom a portion of the salary is charged directly to or whose effort is cost-shared with one or more sponsored activities. These effort reports (Form TE-1, Attachment II) indicate and certify the percentages of the individual's total University effort that are dedicated to the sponsored program(s), as well as to other University activities. In addition, the reports attest to the reasonableness of the reported effort percentages.

This procedure describes UDC's implementation of after-the-fact effort reporting, clarifies roles and responsibilities, defines who can certify effort, and lists consequences for non-compliance.

Roles and Responsibilities:

The **Office of Sponsored Programs (OSP)** is responsible for oversight of the time-and-effort certification process:

- Establishing and communicating the policy and procedures within the University.
- Assisting Schools/Departments, faculty, and administrative offices and staff in understanding and implementing this requirement and procedure.
- Reviewing proposals, prior to submission, to ensure that effort commitments have been made according to University and Federal policy.

- Providing assistance to individuals supported by sponsored activities, to ensure that effort reporting accurately captures effort and effort commitments, and that salaries charged to sponsored activities reflect the actual effort applied to the activity.
- Ensuring the Office of Grant Accounting is informed about in-kind effort applied to sponsored projects, so that total in-kind contributions can be tracked.
- Maintaining After-the-Fact certified effort reports consistent with University and Federal document retention policies.

Principal Investigators/Program Directors are responsible for:

- Understanding the principles and policies (Federal and UDC-specific) behind reporting the effort expended on sponsored program activities.
- Committing effort on Federal and Federal flow-through sponsored program activities as deemed appropriate for the scope of work at hand and as approved by their Department Head/Dean/Vice-President and verified by signatures on the Office of Sponsored Programs Proposal Routing Sheet.
- Ensuring that effort commitments (directly paid or cost shared) are met and that After-the-Fact reports are completed for all personnel whose effort is committed to or paid by the program. Both in-kind and compensated effort must be accounted for in the context of the total effort of the individual (100%), using The Faculty/Professional Staff After-the-Fact Activity and Effort Reporting Form (Form TE-1, Attachment II).
- Alerting OSP promptly if any concerns arise regarding actual or potential significant changes (normally plus or minus 25%) in effort applied versus commitments to sponsored activities.
- Ensuring that after-the-fact effort reports are certified by themselves and the cognizant department head or manager, and submitted to OSP prior to the due dates (September 1 for summer term, January 15 for fall term, and June 1 for spring term).

Department Chairs, Division Heads, Deans, and Vice Presidents are responsible for:

- Understanding the Federal and UDC policies and requirements for certifying effort on sponsored programs.
- Ensuring that processes are in place within the unit to identify and capture effort on Federal and Federal flow-through sponsored program awards.
- Reviewing effort commitments on proposals to confirm reasonableness and achievability and for oversight and proper and effective implementation in their school/college/unit.

Consequences of Failure to Comply with the Policy

If the periodic effort reports are not completed, certified, or submitted properly and in a timely manner, the Office of Sponsored Programs will take action to assist with compliance with Federal requirements. These actions may include, but are not limited to:

1. Placing active projects/awards ‘on hold,’

2. Adjusting uncertified labor distributions and the effort they represent to non-sponsored accounts as *cost share*.
3. Barring non-compliant individuals from serving as a Principal Investigators, and non-compliant units from submitting or administering Federal grants or contracts.

ATTACHMENT I

OMB CIRCULAR A-21
Revised 05/10/04

a. **(2) After the fact Activity Records:** Under this system the distribution of salaries and wages by the institution will be supported by activity reports as prescribed below.

(a) Activity reports will reflect the distribution of activity expended by employees covered by the system (compensation for incidental work as described in subsection a need not be included).

(b) These reports will reflect an after the fact reporting of the percentage distribution of activity of employees. Charges may be made initially on the basis of estimates made before the services are performed, provided that such charges are promptly adjusted if significant differences are indicated by activity records.

(c) Reports will reasonably reflect the activities for which employees are compensated by the institution. To confirm that the distribution of activity represents a reasonable estimate of the work performed by the employee during the period, the reports will be signed by the employee, principal investigator, or responsible official(s) using suitable means of verification that the work was performed.

(d) The system will reflect activity applicable to each sponsored agreement and to each category needed to identify F&A costs and the functions to which they are allocable. The system may treat F&A cost activities initially within a residual category and subsequently determine them by alternate methods as discussed in subsection b.(2)(c).

(e) For professorial and professional staff, the reports will be prepared each academic term, but no less frequently than every six months. For other employees, unless alternate arrangements are agreed to, the reports will be prepared no less frequently than monthly and will coincide with one or more pay periods.

(f) Where the institution uses time cards or other forms of after the fact payroll documents as original documentation for payroll and payroll charges, such documents shall qualify as records for this purpose, provided that they meet the requirements in subsections (a) through (e).

(3) **Multiple Confirmation Records:** Under this system, the distribution of salaries and wages of professorial and professional staff will be supported by records which certify separately for direct and F&A cost activities as prescribed below.

(a) For employees covered by the system, there will be direct cost records to reflect the distribution of that activity expended which is to be allocable as direct cost to each sponsored agreement. There will also be F&A cost records to reflect the distribution of that activity to F&A costs. These records may be kept jointly or separately (but are to be certified separately, see below).

- (b) Salary and wage charges may be made initially on the basis of estimates made before the services are performed, provided that such charges are promptly adjusted if significant differences occur.
- (c) Institutional records will reasonably reflect only the activity for which employees are compensated by the institution (compensation for incidental work as described in subsection a need not be included).
- (d) The system will reflect activity applicable to each sponsored agreement and to each category needed to identify F&A costs and the functions to which they are allocable.
- (e) To confirm that distribution of activity represents a reasonable estimate of the work performed by the employee during the period, the record for each employee will include:
 - (1) the signature of the employee or of a person having direct knowledge of the work, confirming that the record of activities allocable as direct costs of each sponsored agreement is appropriate; and,
 - (2) the record of F&A costs will include the signature of responsible person(s) who use suitable means of verification that the work was performed and is consistent with the overall distribution of the employee's compensated activities. These signatures may all be on the same document.
- (f) The reports will be prepared each academic term, but no less frequently than every six months.
- (g) Where the institution uses time cards or other forms of after the fact payroll documents as original documentation for payroll and payroll charges, such documents shall qualify as records for this purposes, provided they meet the requirements in subsections (a) through (f).

http://www.whitehouse.gov/omb/circulars/a021/a21_2004.html



ATTACHMENT II

**FACULTY/PROFESSIONAL STAFF AFTER-THE-FACT
ACTIVITY & EFFORT REPORTING FORM**

OSP USE ONLY
Reviewed: _____
CC Dean or VP: _____
CC Grant Acctg, if in-kind effort involved: _____

Date: _____ Reporting Period: (Term/Year): _____

Name: _____ Dept.: _____ School: _____

This information is needed for Federal Documentation and Audit Requirements.

ACTIVITY List Sponsored and Regular Activities	GRANT No.	Grant Name	Percent Effort Must total 100%
Other Research (not for a sponsored program)			
Teaching			
Administration			
Service			

Actual total number of hours worked per week on average for teaching, research, administration, and service: _____

(Please complete the information and provide signatures on the back of this form)

Describe the Major Work Performed for Sponsored Project(s), and report effort committed, if applicable:

Sponsored Project (Grant #)	Description of Activities Performed	% Effort Committed & Funded	% Effort Committed In Kind	% Effort Performed

I certify that the information is correct:

Employee _____

Date _____

Principal Investigator*/Program Director*/Coordinator (Primary project)

Date _____

(if applicable):

Principal Investigator*/Program Director*/Coordinator (Other projects)

Date _____

Department Head or Manager of Employee

Date _____

After obtaining required signatures return this form to the Office of Sponsored Programs. Thank you

Report is due by January 15 for Fall Term, by June 1 for Spring Term, and by September 1 for Summer.
OSP will distribute copies to Dean or Vice President and to Office of Grant Accounting, as appropriate.