EFFORT CERTIFICATION

The Office of Research and Scholarship

The University of Texas at TYLER

Purpose

- The purpose of this course is to familiarize faculty and their administrative support staff with Federal regulations and UT Tyler's policies and procedures that govern effort commitments, reporting and certification.

Audience

Completion of this course is recommended for:

- Principal Investigators (PIs) with active sponsored projects

- Department administrative and support staff who provide support to PIs on their accounts (e.g., make grant appointments)

Why are we here?

- External funding for sponsored programs often comes with strings attached
  - Accepting Federal funds means **compliance** with applicable cost principles (2 CFR 200)
  - Universities receiving sponsored research dollars should have appropriate systems, policies and procedures in place to properly document all commitments, including effort

Why are we here?

Effort Reporting has come under increasing scrutiny

- Focus of Federal review and enforcement activity

- Several multi-million dollar False Claims Act settlements

- NSF/OIG audits (recent and ongoing)*

* NSF – National Science Foundation
* OIG – Office of Inspector General

Why is there so much emphasis on effort reporting?

Northwestern University (2003)
"...knowingly or recklessly overstated ... faculty..."

Johns Hopkins University - $2.6 million (2004)

East Carolina University - $2.4 million (2004)

Harvard University/Beth Israel Deaconess - $3.25 million (2000 & 2004)

University of Alabama-Birmingham - $3.0 million (2005)

University of Connecticut - $2.5 million (2006)

Caltech - $11K (2007)

Florida International University - $11.5 million (2006)

Why is there so much emphasis on effort reporting?

Areas of government focus in audits/investigations related to effort reporting:

- Salary charges
- Over-commitments
- Salary cost transfers and cost sharing
- Integration with systems that report time or effort
- Roles and responsibilities
  - Who ensures appropriate salary is charged?
  - Who ensures level of commitment is reasonable?
  - Who signs the reports?
  - Who independently monitors to evaluate system's effectiveness?

Why is there so much emphasis on effort reporting?

Institution	Headline	Source	Date
(multiple)	Researchers Criticized for Poor Time-keeping	Nature	October 2007
University of Pennsylvania	NSF Audit of Penn Finds Systemic Weaknesses in Effort Reporting	Report on Research Compliance	September 2006
Yale University	Yale's Use of Research Grants Attracts Government Scrutiny	Wall Street Journal	July 2006
Florida International University	Florida International U. Agrees to $11.5-Million Settlement with Government Over Grants Accounting	The Chronicle of Higher Education	February 2005
Harvard University	Harvard Agrees to Pay $2.4-Million More to Settle Allegations of Overcharging the NIH	The Chronicle of Higher Education	June 2004
Johns Hopkins University	Johns Hopkins U. Settles Federal Charges of Overbilling on Federal Grants	The Chronicle of Higher Education	March 2004
Northwestern University	Northwestern University OK's Settlement in Federal Grant Case	The Chicago Tribune	February 2003

Am I alone in Effort Reporting?

Effort Reporting at UT Tyler is a **SHARED** responsibility.

- Faculty Principal Investigators (PIs)
- Departmental Administrative and Support Staff
- Department Chairs & College Deans
- Office of Research and Scholarship (ORS)
- Human Resources
- Financial Reporting/Budgeting
- Associate Provost for Research & Scholarship

What is Effort?

■ Effort is the amount of time spent on any activity expressed as a percentage of Total Institutional Activities for which an individual is compensated by UT Tyler.

- **Effort includes:**
  – Sponsored Programs (e.g. grants and contracts)
  – Non-Sponsored Research
    • Teaching
    • Public Service
  – Administrative Duties
  – Other Institutional Activities

- **Effort does not include:**
  – Outside consulting or other income earned outside of duties to UT Tyler
  – Supplemental compensation for non-permanent, incidental work

How do you calculate effort?

- Total Effort = $\sum$ (UT Tyler Activities)

- Total Effort = % Sponsored Activities

  +

  % Non-Sponsored Activities

Example

Dr. Newton is involved in the following activities:

- Teaches one course = 25%

- Manages three sponsored projects:
  - Apple grant = 25%
  - Gravity grant = 25%
  - Wig contract = 25%
  - Total commitment 25% teaching; 75% grant

Is there a maximum commitment level?

- 100% effort is allowable over the summer provided that the individual cannot perform other activities during that period (e.g. serving on institutional committees, writing proposals, etc.) whose costs are not allowable under the Uniform Guidance, 2 CFR 200.

Principles for determining whether effort is chargeable to a grant

- As the PI, you are responsible for the charges to your grants which includes your effort and the effort of those devoting effort on your grant.
    - If you were interviewed by an auditor, consider how would you defend your decision to charge a particular researcher to a specific grant.
    - Is that person/position listed on the proposal?
    - Do you have suitable means of verifying their work on the grant (i.e.: log books, time sheets, etc.)
    - When in doubt, contact the ORS.

What are we looking for?

- Minimum and maximum levels of effort commitments

- Over-commitments

- Administrative duties

- Summer appointments

- Contributed Effort (aka cost shared effort)

What is Cost Sharing?

- <u>Mandatory Cost Sharing</u>: Required by the sponsor as a condition of obtaining the award. Mandatory cost sharing must be specified in the proposal; otherwise, the proposal will not receive consideration from the sponsoring agency.

- <u>Voluntary Committed Cost Sharing</u>: Cost sharing that is not required by a sponsor, but is nevertheless pledged in the proposal or subsequent communication with the sponsor. This type of cost sharing is often used to reflect accurately the total resources necessary to complete a project.

What is Cost Sharing?

- **Voluntary Uncommitted Cost Sharing:** Faculty-donated additional time above that agreed to as part of a sponsored agreement.

- **In-Kind Contributions:** Non-cash contributions provided by the university or third parties.

How is effort related to salaries?

- The salaries paid by UT Tyler to its employees working on Federal grants are generally charged or allocated to those grants on the basis of effort expended

- For example, if 33% of an employee's total effort is expended on a Federal grant, then up to 33% of the employee's salary is chargeable to that grant

- A certified effort report confirms that charges are reasonable in relation to the work performed

Who certifies effort?

It is the responsibility of every Principal Investigator to certify their own effort and the effort of all persons working on their sponsored programs, as they have the best firsthand knowledge of their sponsored programs and can provide suitable means of verification of effort.

- Examples of suitable means of verification:

  - Calendars
  - Travel Records
  - Teaching Schedules

  - Contemporaneous Meeting Notes
  - Log Books
  - Times Sheets

Who states the PI should?

"Specifically, PIs have primary responsibility for all aspects of the sponsored projects including approval of all charges and ensuring that the research is conducted in accordance with the award terms and conditions."
(NSF Audit of Payroll Distribution System, Cal Tech, OIG 07-01-013)

Are there exceptions?

- There are some exceptions made for practical reasons (e.g. perhaps the researcher is out of the country or is on temporary leave of absence).

- Federal requirements are that anyone certifying effort for another individual must credibly have first hand knowledge of the individual's actual effort.

Does the ORS certify effort?

Management and oversight of federal programs is the responsibility of the Office of Research and Scholarship and the Associate Provost for Research and Scholarship, but we do not certify effort.

Future of effort reporting: ECRT

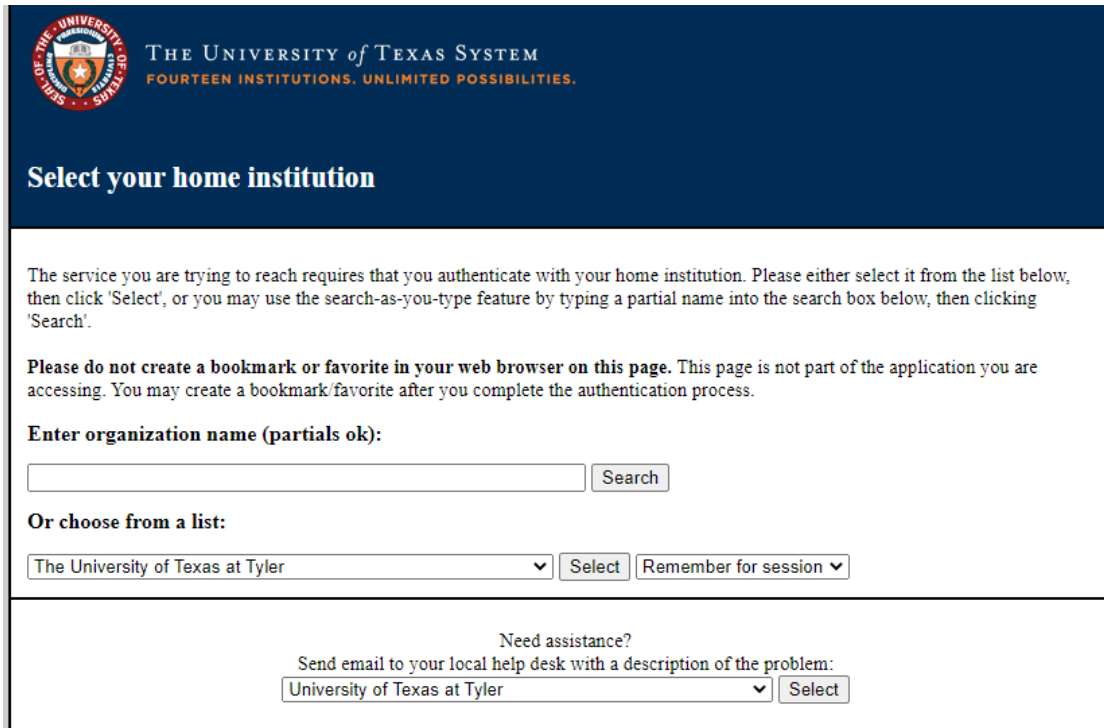|	**Define**	**ECRT**
Method of distribution	Paper-based	Web-based
Frequency of distribution	Monthly	Semi-annually
Certifiers	PIs	PIs
Review period	Monthly	Six months
Certification window	30 days	30 days

What is ECRT?

- Effort Certification and Reporting Technology (ECRT) is a web-based compliance technology to help research institutions minimize their risk of financial penalties for failing to meet federal regulations regarding effort reporting and salary certification.

- ECRT will be implemented at each component in the UT System, however, ECRT is not currently used by all entities in the UT System

Benefits of ECRT

- Resource Utilization -- automated process to minimize the level of administrative burden with reporting and certification process.

- Enhanced Accountability -- researchers approving effort reports can verify assignments first-hand from any computer via the internet.

- Accuracy -- certification is based on actual time spent, versus budgeted payroll charges and requires completion and return of effort reports in a timely manner.

- Management Reports -- help to provide consistency, validation, and elimination of errors.

- Data Centralization -- electronic archiving of certification data.

ECRT Navigation – Login Screens

THE UNIVERSITY of TEXAS SYSTEM
FOURTEEN INSTITUTIONS. UNLIMITED POSSIBILITIES.

Select your home institution

The service you are trying to reach requires that you authenticate with your home institution. Please either select it from the list below, then click 'Select', or you may use the search-as-you-type feature by typing a partial name into the search box below, then clicking 'Search'.

Please do not create a bookmark or favorite in your web browser on this page. This page is not part of the application you are accessing. You may create a bookmark/favorite after you complete the authentication process.

Enter organization name (partials ok):

[   ] [Search]

Or choose from a list:

[The University of Texas at Tyler ▾] [Select] [Remember for session ▾]

Need assistance?
Send email to your local help desk with a description of the problem:
[University of Texas at Tyler ▾] [Select]

• Open a web browser

• Choose UT Tyler from the institution drop-down list and click "Select"

ECRT Navigation – Login Screens

UT TYLER
Authentication System

Welcome to the UT Tyler Authentication System

Email Address [   ]

Password [   ]

[Login]

Login gives you access to protected Web resources.

WARNING: Protect your privacy! Prevent unauthorized use! Completely exit your Web browser when you are finished.

UT Tyler Policy Acknowledgement:

- Unauthorized use is prohibited.
- Usage may be subject to security testing and monitoring.
- Misuse is subject to criminal prosecution.
- No expectation of privacy except as otherwise provided by applicable privacy laws.

This login page will be displayed.

- Enter your EID and password in the appropriate fields

- Click on the "Login" button

UT TYLER.

Welcome to UT Tyler's Effort Certification Reporting Technology (ECRT) system

At UT Tyler, we have deployed a web-based ECRT system to serve as the new tool to facilitate the institution's effort reporting and certification process. The institution's previous process - which included a variety of paper forms and cumbersome manual processing - will no longer be used. Individuals that are required to review and certify their research effort can take comfort knowing that this new technology dramatically simplifies the process.
ECRT is a web-based technology that intuitively guides certifiers and administrators through the various facets of the effort reporting and certification process on a periodic basis. The ECRT system uses a guided process to walk you through the steps that you will need to complete your effort certification. Our institution's process will be simplified and standardized as a result of this technology ... keeping the process simple for you, the end user.
The ECRT system is designed to help you comply with the provisions of this institution's effort reporting policies, federal policy OMB Circular A-21 section J.10 , NIH Salary Limitation on Grants, and other relevant agency policies that govern the need to provide certification of an individual's effort pursuant to his/her sponsored and non-sponsored programs. Faculty and staff are required to complete and submit an Effort Certification Statement for review and approval by a user's respective deadline.
So, log in and get started. You will be certified before you know it!

[Continue]

- Click "Continue" when prompted with this message

Navigation Links & Drop Down Menus

- The effort lifecycle wheel contains links to various functions you will need to use within the system.

- Drop down menus: Across the top of the page is a menu bar. The left most option "Home" will return you to the home page containing the effort lifecycle.

- To log off of the system, click the right most option "Logout". The remaining three options match the sections of the effort lifecycle. The links contained in the drop-downs give you access to the menu options available on the effort lifecycle, from any screen within the system. Menus highlighted in the green box are specific to Certifiers.

Manage Global Settings
Central Administration
Manage Roles and Rights
Manage Users
Add Users
Load Data
Change My Password
Manage My Email

Administration

Data & Workflow

Manage Effort Tasks (0)
Manage Department
Manage Sponsors
Add Commitment
Add Cost Sharing
Assign Designee
View Reports
Query Analyzer

The Effort Lifecycle

Certification

Certify / View My Effort
View My Historical Effort
Effort Recertification
Certify My Support Staff - Single View
Certify My Support Staff - Group View
View the Support Staff of a PI

Certify My Effort

- To certify your Effort select "**Certify/View My Effort**" from the Certification section of the wheel.

  Certify / View My Effort
  View My Historical Effort
  Effort Recertification
  Certify My Support Staff - Single View
  Certify My Support Staff - Group View
  View the Support Staff of a PI

- This is the main view of the effort card. Within sponsored and non-sponsored projects you may view payroll and effort.

- Edit/review payroll and effort to ensure accuracy.

- Edit information as needed or send to Department Effort Coordinator to make the correction.
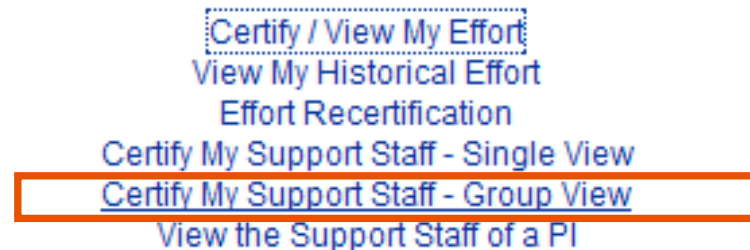
- Once you have verified that the information is correct. Click on the "**Save**" button to save the information or click "*All*" and then "**Certify**" to certify the information. The **"Cancel"** button will close the screen without saving or certifying the information and will return you to the main screen .

  Show Dollar Value   Effort Calculator

Certified Effort	Certify Checkboxes
0%	☐
0%	
0%	
0%	All / None

  Save Cancel

Certify My Support Staff – Group View

- To certify your Supporting Individuals select "**Certify My Support Staff-Group View**" from the Certification section of the wheel or from the drop down menu under Effort Certification.

Certify / View My Effort
View My Historical Effort
Effort Recertification
Certify My Support Staff - Single View
Certify My Support Staff - Group View
View the Support Staff of a PI

- This is the main window to certify the effort of your supporting individuals. The system will display up to ten individuals at a time.

FOR ASSISTANCE WITH OTHER
TIME & EFFORT RELATED QUESTIONS,
PLEASE CONTACT THE RESEARCH
COMPLIANCE COORDINATOR AT
ECRT@UTTYLER.EDU