

University of Maryland, Baltimore

Effort Reporting Policy Statements

Purpose:

To state and illustrate policies governing University of Maryland Baltimore (UMB) effort reporting process and systems.

Background: Effort reporting encompasses many processes, including committing effort, charging and cost sharing salary expense for effort, and certifying effort to support commitments and salary charges.

As a recipient of significant sponsored funds, UMB must assure Federal and other sponsors that the assignment of time and associated salary and fringe benefit costs to sponsored projects is fair, consistent, and timely. The UMB effort reporting policies – along with related definitions, procedures, forms, data and technology – are the means by which this responsibility is fulfilled. Financial penalties, expenditure disallowances, and harm to UMB's reputation and competitive position in seeking grants could result from an inadequate effort reporting process and supporting systems, or from failure to comply with effort reporting policies and requirements.

A basic regulatory framework for effort reporting is provided by select Federal regulations, principally Office of Management and Budget (OMB) Circular A-21 and other publications such as the Department of Health and Human Services Public Health Service Grants Policy. The development of this Effort Reporting Policy is an acknowledgement of the significant complexities and ambiguities of effort reporting and the challenges of understanding and complying with the Federal requirements.

This Policy is intended to provide guidance to faculty, and to the administrators who support them, in the most explicit and constructive way possible; to respond to common faculty and administrator questions; and, in general, to assist faculty members' in the scientific and administrative performance of sponsored projects. This Policy reflects an attempt to prepare guidance consistent with UMB's simultaneous objectives of promoting research and compliance.

This Policy, and the larger body of procedures, forms, data and systems used in effort reporting, will continue to be evaluated for opportunities to improve their effectiveness.

Audience:

All individuals involved with the administration and conduct of sponsored project activities, including campus, school and department sponsored project administrators, Principal Investigators, and other research personnel.

Effort and Effort Reporting Definitions:

Effort is defined as the proportion of time spent on any activity and expressed as a percentage of the total professional activity for which an individual is compensated by Institutional Base Salary. Total professional activity includes time devoted to sponsored projects, as well as University activities such as teaching, clinical practice, administration, and other activities. Effort is not based on a standard workweek. If an investigator works 80 hours in a week, 40 hours represents 50% effort. If an investigator works 40 hours in a week, 40 hours represents 100% effort. The total time compensated by Institutional Base Salary constitutes 100% effort. For example, for a graduate student who is employed for only 10 hours, that 10 hours represents 100% effort. The total effort expended cannot be more than - or less than - 100%.

On most federal grant and contract proposals, effort is proposed in person months. For staff and faculty with 12 month appointments, regardless of FTE level, effort is based on 12 person months. The total effort expended cannot be more than - or less than – 12 months.

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Effort Commitments

For many grants and contracts, during the proposal and award process, UMB commits a level of effort for the key personnel on the project. These commitments must be monitored to ensure that:

- individuals are not overcommitted (total sponsored and nonsponsored commitments are not greater than 100%), and
- individuals are using a basis for committing effort that will be consistent with how work will be performed and salaries are charged, and
- individuals are meeting those commitments.

Effort Certification

OMB Circular A-21 requires that after-the-fact certifications be obtained to document the actual distribution of an individual's effort. The effort certification serves as the auditable document that supports that:

- Effort supported (paid) by a project has been performed as committed, and
- Effort expended in support of a project, but not paid by the project, also has been performed as committed.
- The salaries charged to the sponsored project were reasonable and fair given the distribution of the individual's effort.

Salary Charging

An effective effort reporting process is closely tied to an effective salary distribution process. In order for grants and contracts to be properly costed, salary distribution to and among sponsored projects and nonsponsored activities must remain consistent with effort reporting. Payroll must be set up timely according to planned effort driven by effort commitments on sponsored projects and nonsponsored activities. Additionally, if after-the-fact effort certifications disclose that actual effort was different than planned, then salary distributions should be timely reconciled to the after-the fact effort certifications. Once salary is distributed, the related fringe costs will follow the salary costs.

Payroll and effort distributions are not the same thing; payroll distributions describe the allocation of an individual salary, while effort distributions describe the allocation of an individual's activity to individual projects "independent of salary." UMB's effort certification process relies on payroll distributions to provide a general reminder of the projects on which an individual's salary was charged during the certification period. Individuals completing effort reports are required to identify other areas where they provided effort with no salary support and to ultimately report the appropriate distribution of effort over all activities.

Cost Sharing

Cost sharing is a use of University resources or funding that supplements externally sponsored projects. Salary cost sharing occurs when effort exceeds the payroll charged to a particular project. When effort exceeds salary reimbursement, the difference must be cost shared. These costs are not reimbursed by the sponsor and must be supported by nonsponsored University funds.

There are three types of cost sharing:

- **Voluntary Committed Cost Sharing** – Voluntary committed cost sharing occurs when a PI includes cost sharing in a proposal, or cost shares in the execution of the project, when the sponsor does not require cost sharing as an award condition. Cost sharing in the execution of the project occurs when full salary support was requested for an individual's effort on a proposal;

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however, during the course of the award, the individual works the committed level of effort, but because of rebudgeting or effort during a no-cost extension, the salary is not reimbursed by the sponsor.

- **Mandatory Cost Sharing** – Mandatory cost sharing occurs when the sponsor requires it as an award condition. This includes cost sharing resulting from a salary limitation that restricts the amount of direct salary an employee who is working under a sponsored grant or agreement can be paid by the granting agency. For example, the NIH Grants Policy Statement establishes and publishes a salary cap schedule each year that restricts the amount of direct salary an employee who is working under an NIH grant or cooperative agreement can be reimbursed from the granting agency.
- **Voluntary Uncommitted Cost Sharing** – Voluntary uncommitted cost sharing represents additional effort expended on the project that was not committed to at the time of award. This type of cost sharing occurs when effort exceeds salary reimbursement and committed effort levels.

Voluntary committed cost sharing and mandatory cost sharing must be captured in companion cost sharing chartstrings. For more information, please visit http://www.ord.umaryland.edu/policies_procedures/costshare.html for details on the University's Cost Sharing Policy, No: 3704. Voluntary Uncommitted Cost Sharing may or may not be considered when certifying effort. If this additional effort is considered it should be documented on the effort form.

Critical Policy Statements:

The critical policy statements are outline below, in a manner that is consistent with the lifecycle of the effort reporting process. Individuals with academic year appointments should reference the addendum to this policy for academic year appointments.

Appointing Faculty & Staff

1. Basis for estimating effort percentages and calculating salary requests in proposals

Preparing Proposals, Budgets, and Award

2. Expectation for faculty effort in proposals
3. Institutional position on voluntary cost sharing
4. Reduction of effort commitments when awarded budget is less than proposed budget
5. Monitoring of effort commitments and commitment levels

Charging Salary

6. Prospective establishment of salary distribution on sponsored project/cost sharing chartstrings

Certifying Effort

7. Certification of effort reports

General

8. Training for faculty, research staff, and administrators on effort reporting
9. Roles and Responsibilities

The policy statements are outlined in detail in the remainder of this Policy.

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Policy Statements, Rationale, Guidelines, and Procedures:

1. Basis for estimating effort percentages and calculating salary requests in proposals

Policy Statement

The basis for salary request calculations in proposals is the UMB Institutional Base Salary. This is defined in UMB's Institutional Base Salary Policy which can be found at:
<http://www.cost.umaryland.edu>

For faculty whose corresponding salary exceeds the applicable National Institutes of Health (NIH), or other sponsor, salary limitation, the basis for the salary request in a proposal must be the NIH (or other sponsor) salary limitation. However, the actual annual salary amount must be indicated in the budget justification, consistent with Federal requirements and to allow for increased funding in the event that the limitation is raised.

The basis for effort percentages (what constitutes 100% of an individual's effort) is based on the activities for which the individual is being compensated by the Institutional Base Salary. If an individual receives supplemental compensation above the Institutional Base Salary from UMB or an outside entity, and this compensation is for activities that are not part of the individual's normal UMB responsibilities, the activities related to this compensation should be excluded from the basis. Payments under incentive compensation plans and other performance bonuses are not tied to specific activities and therefore do not require any adjustment to the basis for effort. One hundred percent (100%) effort is defined as the effort expended to accomplish the set of activities encompassed by UMB (and, if applicable, faculty practice plan) activities and assignments, regardless of the actual number of hours expended on those activities and assignments. One hundred percent effort is not defined as a single, standard number of hours or days per week, since it will likely be different for each faculty member and may vary during the year. The number of hours implicit in an individual faculty member's "100%" must be reasonable and supportable to department, school, university and external reviewers if requested.

The basis used for proposing/committing effort and requesting salary support should be the same basis used in charging salary and certifying effort.

When sponsors require effort to be requested in person months, the percentage of effort is simply converted to a 12-month basis for individuals with 12-month appointments. Regardless of FTE level, effort is based on 12 months. The total effort expended cannot be more than - or less than - 12 months.

Policy Rationale

UMB faculty members need a defined set of activities against which to estimate effort percentages and request salary in proposals. This defined set of activities is also the basis for charging salary and certifying effort on their sponsored projects.

Related Guidelines and Procedures

- A. Expectations related to a faculty member's appointment(s) are outlined generally in the UMB Faculty Handbook, School faculty handbooks and faculty effort policies (if they exist), and, more specifically, in the faculty member's appointment letter and/or annual evaluation and salary letters.
- B. When preparing proposals, appointments at other affiliated entities, such as Veterans Affairs (VA) medical centers, must be clearly disclosed in proposals and, while not included in the basis upon which estimated effort is expressed when the compensation is excluded from Institutional Base Salary, nevertheless considered in determining -- i.e., reducing -- the effort available to expend on sponsored projects awarded to UMB. Please see the Additional Guidance for Individuals with VA and/or University Physicians, Inc. Appointments at: <http://www.cost.umaryland.edu>

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2. Expectation for faculty and other key personnel effort in proposals

Policy Statement

Faculty, students, and staff are expected to commit a reasonable and appropriate level of effort (> 0%) on proposals on which they are listed as Principal Investigator (PI) or key personnel. This may not apply for certain types of proposals, as described below.

Policy Rationale

This policy is based on an explicit requirement outlined in the January, 2001 Office of Management and Budget (OMB) clarification to Circular A-21 (“Cost Principles for Educational Institutions”). It is also a reasonable expectation since a PI has responsibility for the scientific, administrative and financial management of a sponsored project – fulfilling these responsibilities requires time.

Similarly, any individuals listed as “key personnel” on a project are expected to expend effort on the project consistent with the role and responsibilities of key personnel as described in the proposal for the project.

Related Guidelines and Procedures

- A. This policy does not apply (i.e., no faculty committed effort is required) for equipment and instrumentation grants, doctoral dissertation grants or student augmentation grants. In addition, no effort commitment is required from faculty mentors (also known as preceptors or program faculty) on institutional training grants, since the faculty mentor’s effort will be assigned to the specific research projects on which the trainees are involved. However, an effort commitment is expected for the named research training program director, since he/she will be expending effort in coordinating the training program. Similarly, no commitment of effort is expected from faculty mentors on individual training grants, as their effort will be assigned to the research projects on which the trainee(s) may be involved.
- B. In general, the effort commitment outlined for each individual referenced in a proposal should be consistent with the description of that individual’s role on the project. All personnel whose names are listed in the proposal as “key personnel” are expected to have an appropriate level of effort committed. It is only in the case of an individual whose level of involvement is expected to be minimal (e.g., limited to occasional brief discussions) that it may be acceptable for no specific effort commitment to be made. If the individual’s involvement is expected to be greater, that individual should be listed in the proposal with a specific effort commitment (when a UMB employee) or that individual should be proposed as a subcontractor (generally, when a non-UMB employee).
- C. Faculty committed effort is required for both Federal and non-Federal sponsored project proposals, including industry clinical trials and fixed price agreements. In the case of these trials and agreements, even though there may not be an explicit percent effort identified in the proposal documents submitted to the sponsor, it is expected that effort has been committed. Such commitment is implicit in the reimbursement negotiated with the sponsor, and will be taken into account in determining effort available to commit to other sponsored projects.
- D. Given the highly variable nature of projects, it is not feasible to develop a single standard or set of standards to define “appropriate level of effort.” However, in general, faculty effort committed in proposals should:
 - i. Be reasonable given the nature and complexity of the project;
 - ii. Reconcile with the individual's other responsibilities, including other sponsored project commitments, teaching, service, administration, and – where applicable – clinical activities, both current and pending;
 - iii. Not be inflated (or reduced) beyond what is reasonably required in order to create the most “attractive” proposal;
 - iv. Be consistently reflected throughout the proposal including the budget/budget justification, the Other Support Pages, and any other communication with the sponsor; and

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- v. Be accompanied by a request for a commensurate amount of salary funding, to the extent accepted by the sponsor.
- E. Effort expectations on NIH K-awards vary significantly from other funding types. Individuals proposing or working on NIH K-awards should reference UMB's additional guidance on NIH K-awards. <http://www.cost.umaryland.edu>

3. Institutional position on voluntary committed cost sharing

Policy Statement

UMB does not typically commit to cost share on a voluntary basis, consistent with its objective of maximizing sponsor cost reimbursement to support the continued growth of the research enterprise. A voluntary cost sharing commitment should be made only where the competitive forces and perceived institutional benefit of receiving the award are deemed to be sufficiently strong to warrant the commitment.

See the University's Cost Sharing Policy (<http://www.fincsvc.umaryland.edu/policies.cfm>; Policy # 3074) for additional detail on cost sharing.

Policy Rationale

When a sponsor is not asked to fund and/or is not charged for a cost that specifically benefits a project, cost sharing occurs.

The rationale behind this policy statement is the promotion of strategic decision-making in committing the University to fund costs related to externally-sponsored projects. It is the University's objective to obtain maximum cost reimbursement from its sponsors; achieving this significantly enhances the University's ability to continue to grow the research enterprise.

Related Guidelines and Procedures

- A. The department chair and, for many schools, the Dean's Office, reviews and endorses proposals for submission. These reviews should include assessment of conformance with this policy including the review of the cost sharing approval form. The signature of the department chair and/or Dean on a proposal indicates that the chair/Dean have approved any voluntary commitment to cost share after evaluating the rationale for the cost sharing.
- B. When an award is made that includes a cost sharing commitment (whether voluntary or mandatory), this commitment must be met and documented through proper recognition of cost shared expenses in the accounting system and, for cost-shared salary, through appropriate certification of effort on the effort certification reports.

4. Reduction of effort commitments when awarded budget is less than proposed budget

Policy Statement

When an awarded budget reflects a reduction from the proposed budget, it is the responsibility of the PI to evaluate the change and determine the impact on effort commitments and associated salary support.

Generally, a budget reduction of 25% or more from the proposed budget indicates that a proportional reduction in the effort commitment is appropriate, along with a reduced project scope. Sponsors will be notified, as appropriate, of a reduction in the formal effort commitments at the time of award.

Policy Rationale

Unless otherwise notified, sponsors expect PIs (and other key personnel) to provide the level of effort outlined in proposal budgets, even when the amount funded is less than requested. At the time of award, PIs must evaluate how the project will be conducted with less funding, including the impact on effort commitments. In doing so, PIs should carefully and deliberately manage their own (and their key personnel's) total sponsored and non-sponsored effort commitments, and minimize voluntary

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committed cost sharing. A budget reduction of 25% or more from what was proposed generally indicates a project scope reduction and that a corresponding reduction in effort commitments is appropriate. As required, sponsors will be notified of reductions in effort commitments of 25% or more from proposed effort.

Related Guidelines and Procedures

- A. At the time of award, if the awarded budget is reduced from the proposed budget, a PI must confirm how the project will be conducted and how funding will be allocated among budget categories, including confirmation of effort commitments and associated salary support. The PI is responsible for determining whether:
 - i. The budget reductions can be absorbed by reducing/eliminating budget categories other than the salaries of key personnel. Therefore, effort commitments and the related salary support will remain consistent with the proposal.
 - ii. The budget reduction will cause a reduction in salary support for key personnel and there will be a corresponding decrease in the level of effort necessary to complete the project. The sponsor must be notified accordingly to approve this reduction in committed effort.
 - iii. The budget reduction will cause a reduction in salary support for key personnel. However, the effort required will not be reduced from the proposed levels. The resulting voluntary committed cost sharing must be explicitly approved by the chair/Dean through the submission of a cost sharing approval form.
- B. It is the practice of the National Science Foundation (NSF) to request a scope reduction when budgets are reduced by 10% or more – therefore, evaluations by the PI of the impact on effort commitments should be performed on NSF awards that are reduced by 10% or more.

5. Monitoring of effort commitments and commitment levels

Policy Statement

Effort commitments should be monitored to ensure that the PIs and key personnel are meeting the effort commitments agreed to when the award was accepted. Additionally, the total commitment level of an individual needs to be monitored to ensure that the individual has not overcommitted his or her time.

Policy Rationale

Sponsors expect that effort will be expended in accordance with the terms of the proposals and resulting agreements. Additionally, sponsors expect that faculty and other project personnel who commit effort to their project have the effort available to commit. UMB has a responsibility to monitor the commitments of its faculty and other key personnel.

Related Guidelines and Procedures

- A. Whether the associated salary is requested and funded or it is cost shared, the awarded effort is a commitment made to the sponsor that must be met and documented via certification. It is a Federal requirement that the sponsor be notified in advance if PI/key personnel will withdraw from a project entirely, be absent from a project during any continuous period of 3 months or more, or reduce effort by 25% or more from the level that was approved at the time of award. Specific funding agency guidelines should be consulted for additional guidance on sponsors' expectations with respect to changes in effort.
- B. Unless otherwise communicated to the sponsor, the effort commitment percentage during a no-cost extension period is assumed to be consistent with the commitment for the immediately preceding budget period. If a faculty member expects effort to be reduced during the no-cost extension period by 25% or more from the level approved at the time of award, the sponsor should be notified at the time the no-cost extension is requested. If the effort level will not be reduced and funds are not available on the award, the effort during the no-cost extension will be cost shared. As such, a cost sharing approval form will need to be completed and approved.

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- C. At any given time, the sum of a faculty member's effort percentage commitments on active sponsored projects, teaching, service, administration, and – where applicable – clinical activities, cannot exceed 100%. It is understood that the sum of active percentage commitments + *proposed* percentage commitments for a given period may exceed 100%, because proposals may not be awarded. However, to the extent they are awarded, then a reduction must be made to one or more existing commitments and sponsors must be notified, as appropriate, to ensure the total effort percentage does not exceed 100% in any given period.
- D. For physician-researchers, the effort expended on certain types of sponsored clinical research programs, including clinical trials, is often difficult to distinguish from the effort involved in providing patient care. UMB sponsors should not be asked to fund and/or should not be charged for costs associated with effort (especially salary) that also will be/have been recovered from sources of patient care reimbursement (namely, patients and/or Medicare/Medicaid/third party insurers), and vice versa. By extension, effort on UMB clinical research projects must be proposed/certified consistently with the way that the associated salary will be/has been recovered.
- E. Faculty members often have UMB responsibilities outside of their sponsored activities. Therefore, when determining whether an individual is overcommitted, one should consider proposal preparation, service as chair/assistant chair/director, and service on department/school/UMB committees (all of which are to be classified as administration). Teaching and other non-sponsored activities must also be considered. As a result, there are very few instances in which a faculty member can justifiably be 100% committed to sponsored programs. Nonsponsored activities include:

Administration - Effort for administrative and support services that jointly benefit departmental activities. Departmental administration activities are compensated by UMB funds (non-sponsored chartstrings) and are not charged directly to specific sponsored agreements. The costs include the salaries and expenses of chairpersons and other faculty and staff engaged in activities that jointly benefit sponsored projects and departmental activities. Examples include: administering academic and staff personnel policies, planning programs, preparation of bids and proposals (including the typing of proposals, correspondence, telephone calls, etc). NOTE: Some awards allow for the direct charging of administrative support salaries. This activity relates only to the award being charged and does not jointly benefit all departmental activities. As such, this administrative effort should be considered sponsored effort.

Instruction - Instruction is effort related to the teaching and training activities of an institution. Instruction includes all teaching and training activities where the employee is the instructor, whether they are offered for credits toward a degree or certificate or on a non-credit basis and whether they are offered through regular academic departments or through separate divisions such as a summer school division or an extension division. Curriculum development should be considered departmental and university administration and should not be included in the instruction/university supported academic activity effort category.

UMB Supported Academic Activity - UMB supported academic activity is effort for research, development and scholarly activities that are not sponsored projects. As a general rule, UMB supported academic activity is activity conducted by an individual that is not associated with any particular sponsored project, does not have specified objectives and/or deliverables, is not separately and specifically budgeted, and does not require separate accounting and reporting.

Clinical Activities - Effort expended on the direct treatment of clinical patients or clients. Clinical activities effort also includes teaching or supervising clinical personnel, residents, and interns when such teaching effort does not properly belong under the Instruction category. Clinical activities include administrative and support services that solely benefit clinical patient care.

Other UMB Activities - University supported effort expended on campus activities that cannot be properly reported under any other category. Examples are: the office of external affairs, the development offices, service centers, alumni relations, legislative relations, and media relations.

Affiliated Institutional Activities - Effort related to services performed under terms of a service

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agreement with an affiliated institution (e.g. the annual contract with the University of Maryland Medical System).

6. Prospective establishment of salary on sponsored project/cost sharing chartstrings

Policy Statement

Salary distribution should begin on sponsored projects and/or cost sharing chartstrings as soon as the project is awarded, and concurrently with actual project effort.

Policy Rationale

Faculty (and other project personnel) salary should be charged to sponsored chartstrings (or associated cost sharing chartstrings) during the period in which the individuals are expending effort on the project. Adjustments to payroll charges should be made before effort is undertaken, to minimize the volume of necessary, retroactive salary cost transfers. Once effort has been certified for a given period and payroll distribution reconciled to this certification, requesting a retroactive salary adjustment for that period calls into question the reliability of the certification process.

Related Guidelines and Procedures

- A. It is the general expectation that sponsored project chartstrings will be established when awards are received. In addition, the necessary payroll transactions will be processed to ensure the appropriate proportion of salary begins to be funded from these corresponding chartstrings as soon as project work commences. To the extent that the award documents have not yet been received, but the work is commencing, a pre-award spending chartstring should be established to which salary (and other associated costs) should be charged.
- B. This Policy applies to all forms of sponsored project activity, including industry-sponsored clinical trials. Salaries corresponding to the actual effort of PIs, nurse coordinators, and other personnel on industry-sponsored clinical trials should be charged to the designated sponsored project chartstrings (or pre-award spending chartstrings) as that effort occurs (and never more than 90 days after the actual effort).
- C. This Policy also applies to service center chartstrings. Salaries corresponding to the actual effort of faculty and other personnel on a service center activity should be charged to the designated service center chartstrings as that effort occurs (and never more than 90 days after the actual effort).
- D. When errors are made, retroactive salary cost transfers must be performed in accordance with the University's Cost Transfer policy. This can be found at the following website:
<http://www.fincsvc.umaryland.edu/policies.cfm>

7. Certification of effort reports

Policy Statement

In general, certification of effort reports should take place in a manner consistent with the requirements of OMB Circular A-21, Section J.10.

- Certification should encompass all of an employee's activities on an integrated basis (i.e., provide for consideration of 100% of the employee's effort).
- Certification should be performed by an individual with first-hand knowledge of 100% of the employee's total effort.

For UMB this means that each person working on sponsored programs should certify his or her own effort reports, regardless of the person's position. **Faculty members are required to certify their own effort reports.**

If it is not possible for research staff member (e.g., graduate students, post doctoral fellows, technicians) to certify his or her own effort reports (e.g., due to involvement on several similar

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research endeavors), then the faculty member should certify the effort reports of the research staff working on his or her sponsored projects, or the effort form should be certified by the immediate supervisor of the research staff member.

Department administrators cannot certify the effort of faculty members or research staff.

UMB and its sponsors recognize that activities related to individual sponsored projects are often inextricably intermingled with related projects or non-sponsored UMB activities. Therefore, effort certifications are recognized to be certifications of a reasonable estimate of an individual's activity. Detailed calculations from time records are not required. However, it is important to consider all sponsored and nonsponsored activities (proposal writing, instruction, administrative duties, etc.) when determining effort percentages.

Effort statements are issued quarterly, beginning in January, April, July and October, for the previous three-month periods. Effort reports are required for all faculty and staff who have either committed effort on a sponsored project and/or had their salary charged to a sponsored project.

Investigators and employees are responsible for reviewing effort statements and completing effort certifications within 8 weeks from the time that effort statements are available for certification. Administrative adjustments (cost transfers and cost sharing documentation) and certifications need to be completed within this time frame.

In order to certify effort, the appropriate individual must sign into the Effort Reporting System (ERS) and complete the effort certification on-line. Paper signatures are not sufficient. More information about using the Effort Reporting System can be found at the [Cost Analysis and Studies website](#).

Policy Rationale

OMB Circular A-21, Section J.10. requires that activity reports be signed by "the employee, Principal Investigator, or responsible official(s) using suitable means of verification that the work was performed." While this statement does not explicitly require personal certification by the PI, experience (including investigations at peer research institutions) has shown that, in practice, it is only the Principal Investigator who possesses the necessary extent of knowledge regarding actual activity.

With regard to research staff (e.g., graduate students and post-docs) on sponsored projects, in many instances the PI has the most knowledge of the specific projects on which research staff are working. Where possible, the research staff member should certify his/her own effort.

Related Guidelines and Procedures

It is appropriate for administrators to play a role in assisting faculty and research staff with the completion of effort reporting, as those administrators have specific scheduling, payroll, and other information that may be pertinent to the faculty member's ability to certify his or her effort.

8. Training for faculty, research staff, and administrators on effort reporting

Policy Statement

All faculty, research staff, and administrators involved in sponsored programs, and thus in the effort reporting process, are expected to receive appropriate levels of effort reporting training.

All faculty, research staff, and administrators should receive training on effort reporting and UMB's policies, procedures, and systems upon arrival to the institution.

On an annual basis faculty, research staff, and administrators should participate in an effort reporting refresher course in order to stay current with ever-changing Federal and State regulations and UMB policies.

Policy Rationale

As the internal policies, procedures, forms, and systems related to the effort reporting process are continuously responding to the external regulatory environment, training is critical to ensure adequate

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understanding and compliance by UMB personnel.

Related Guidelines and Procedures

Training will be mandatory for faculty and administrators.

For sponsored projects administrators, training is available in classroom format during each quarter of the calendar year. Please go to the Cost Analysis and Studies website:

<http://www.cost.umaryland.edu/index.cfm> for information on the next scheduled sessions.

Training for faculty and other non-administrative staff is available on the web at <http://blackboard.umaryland.edu>. Faculty, research staff, and administrators have the option to pursue refresher training via this online mechanism.

9. Roles and Responsibilities

Principal Investigators

- Propose levels of effort consistent with the effort required to complete a project in relation to their total effort expended under their UMB appointments compensated by their Institutional Base Salary
- Monitor their total effort commitment levels to ensure they are not committed at a level greater than 100%
- Adjust commitments if required due to awarding of proposals that, aggregated with other funded proposals and nonsponsored activities, would commit over 100% effort
- Work according to their commitments
- Monitor the effort of the other key personnel on their awards to be sure that effort commitments are being met
- Certify their own effort reports and possibly those of others working on their awards
- In cooperation with their departmental administrators, monitor the charging of salary on their awards to ensure proper costing
- Identify and seek approval of mandatory and voluntary uncommitted cost sharing

Departmental Administrators

- Assist principal investigators in the preparation of proposal budgets and related effort commitments
- Track committed effort levels for individuals within their department
- Coordinate the collection of effort certifications for individuals within their department
- Based on correspondence with Principal Investigator, prospectively establish salary charging on sponsored awards (or pre-award spending if necessary) and companion cost sharing chartstrings in correlation with how the effort is to be spent.
- Perform necessary cost transfers/cost sharing documentation to ensure salary charging is in line with effort certifications.

Office of Cost Analysis and Studies

- Coordinates the timing, distribution, and collection of effort reports
- Provide institutional oversight for effort reports
- Maintains the Effort Reporting System
- Maintains effort reporting policies, procedures, and training

Financial Services - Payroll

- Works with the department's payroll administrator and Human Resources to ensure that all payroll forms are completed accurately and timely

Dean's Offices

- Monitors faculty appointments and annual salary letter process
- Monitors proposals for submission

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- Assists in the collection of effort reports for their respective schools

Office of Research and Development

- Review proposals for submission
- Assist faculty and departmental administrators negotiate effort levels with sponsors
- Work with Restricted Funds and the departments to assure the timely set-up of chartstrings so that payroll may be processed in a timely manner.

Financial Services - Restricted Funds

- Work with the Office of Research and Development and the departments to assure the timely set-up of chartstrings so that payroll may be processed in a timely manner.