


Subject: Sponsored Programs Effort Reporting Policy	Division Name: Business and Finance	Approval:  Joseph F. Sheley, President Date: 10/2/15
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A. Purpose

At California State University, Stanislaus (University) all grant and contract awards are made to and accepted by the University. California State University (CSU) requires that each campus develop and maintain policies and procedures regarding involvement with the solicitation, acceptance and administration of awards from extramural sponsors for the conduct of research and scholarly activity, and other sponsored activities. This policy establishes compliance with this requirement by the University.

B. Scope of Policy

Each University department conducting research, instruction, and/or other sponsored work under grants, and other agreements funded by third party entities are required to comply with the Sponsored Programs Effort Reporting Policy.

Office of Management and Budget (OMB) Uniform Guidance provides the principles for determining costs applicable to grants, contracts, and other agreements, and outlines the regulations governing time and effort reporting and the verification of salary distributions. Federal regulations require that effort reports be completed to provide after-the-fact verification of salaries charged to sponsored projects and also mandate that this verification be completed for all "professorial and professional" staff. University professorial staff includes all faculty members; professional staff is defined as salaried staff and hourly employees.

OMB recognizes that in an academic setting, teaching, research, service and administration are often inextricably intermingled. A precise assessment of factors that contribute to costs is not always feasible, nor is it expected. Reliance, therefore, is placed on estimates in which a degree of tolerance is appropriate.

C. Definitions

Refer to *Glossary of Commonly-Used Terms in Sponsored Programs*.

D. Policy

The University requires that all salaries and wages charged to sponsored projects are certified and consistent with federal requirements. As a condition to receive federal funding, the University is required to maintain and certify the percentage of time that employees devote to federally-funded sponsored projects.

The University's time and effort certification process provides verification of salaries, wages, as well as the time and effort charged to federally-funded projects. Adherence to this procedure is necessary to prevent cost disallowances and penalties by the federal government and other sponsoring agencies.

Effort Reporting Requirements:

- Sponsored Programs activity (effort) is itemized and all non-sponsored activities (e.g., teaching, administration, service, etc.) are grouped as "Other University Functions" for the purpose of effort reporting.
- Employees with multiple PI appointments in a given time period will certify professional effort based on each individual appointment.
- All Effort Reports will account for 100% effort and will be completed not less frequently than twice annually.

- All individuals will certify their own effort reports and then forward to the PI for signature. The PI will certify the effort reports for all professional staff working on sponsored programs under his/her supervision. Effort reports for the PI will need to also be signed by the PI's Dean or supervisor.
- If an individual is no longer employed at the University, the PI will certify the employee's effort reports.
- The signature on the effort report is an endorsement by the employee that, to the best of their knowledge, the salary charged accurately reflects the effort distribution across all activities.
- Non-federally funded sponsored awards requiring effort certification will follow federal guidelines unless otherwise specified by the sponsor agency.

E. Roles and Responsibilities

Pre-Award

Principal Investigator (PI)

- Identifies Reimbursed Release Time (RRT), overload, or salaried staff time that will be either directly charged or cost-shared in the proposal budget.
- Obtains appropriate signatures authorizing cost-shared labor.

Office of Research and Sponsored Programs (ORSP)

- Ensures that labor commitments and cost sharing are identified in the proposal budget.
- Includes current salary information in the proposal budget.

Post Award

Academic Department

Professional Staff:

- Enters faculty labor allocations into PICWEB.

Grant Administration

- Prepares effort reports documenting the effort of faculty and professional staff on all federally-funded grants, contracts, or cooperative agreements based on salary and Release Time information.
- Forwards the effort report to each individual for verification and signature.

Academic Department

Professional Faculty and Staff:

- Reviews Time and Effort reports for project accuracy of allocation percentages. Certifies by signing and submits to PI for approval.

Principal Investigator

- Certifies that the faculty effort is accurately documented on the effort report.
- Certifies that the effort for all professional staff that worked on the project(s) during the applicable time period is accurate.
- Certifies all labor-related cost-sharing.

Department Chair or College Dean

- Reviews and certifies PI effort reports.

Grant Administration

- Ensures that all effort reports are completed in a timely manner.
- Maintains all reports in project files complying with the Record Retention Policy.

F. Procedure

Effort Reporting procedures and documents are identified below:

- Sponsored Programs Effort Reporting Procedure
- Certification of Effort Report (CERT) for Faculty and Exempt Project Employees (Instructions and Form) <http://www.csustan.edu/grantadmin/formsmemos.html>
- Certification of Effort Report (CERT) for Non-Exempt Staff (Instructions and Form) <http://www.csustan.edu/grantadmin/formsmemos.html>

G. Laws, State Codes, Regulations and Mandates

- CSU Additional Employment Policy HR2002-05
<http://www.calstate.edu/HRAdrnlpdf2002/HR2002-05.pdf>
- CSU Collective Bargaining Agreement, Unit 3 – Article 20 and Article 36
http://www.calstate.edu/LaborRel/Contracts_HTML/CFA_CONTRACT/CFAatoc.shtml
- Code of Federal Regulation 2 CFR PART 220 (formerly known as OMB Circular A-21), Section J.IO.
http://www.whitehouse.gov/omb/circulars_a021_2004/
- Board of Trustees Executive Order No. 890 Section 3.3.3
- COGR Management Practices Document-<http://www.cogr.edu>
- NSF/CSU/SDSURF resolution regarding additional employment on NSF grants
- Integrated California State University Administrative Manual (ICSUAM) 11003.06 | Effort Reporting
<http://www.calstate.edu/icsuarnldocuments/Section11000.pdf>

H. Resources

- Glossary of Commonly-Used Terms in Sponsored Programs