

TIME AND EFFORT REPORTING POLICY AND PROCEDURES

The federal government requires an effort report when an individual is compensated by or has agreed to contribute time to a federally-sponsored project. All faculty who serve as investigators on sponsored agreements are personally responsible to certify the amount of effort that they and their employees spent on sponsored activities.

Federal requirements regarding effort reporting

The Office of Management and Budget's (OMB) Circular A-21 "Cost Principles for Educational Institutions" is the federal government's cost principles for colleges and universities. It defines what costs are allowable and allocable to federal grants and other "assistance" agreements.

OMB Circular A-21 (Section J.10) sets forth criteria for acceptable methods of charging salaries and wages to federally sponsored projects. A-21 requires a payroll distribution system that directly charges salaries to appropriate projects.

In addition, Circular A-21 requires that institutions develop a mechanism to determine or confirm how individuals actually expend effort during a specified time period. These effort reports must be performed on a regular schedule and must be certified by individuals who have first-hand knowledge of 100 percent of the employee's compensated activities. In most cases, that would be the employee or the employee's direct supervisor.

What is effort and effort reporting?

Effort is defined as the amount of time spent on a particular activity. It includes the time spent working on a sponsored project in which salary is directly charged or contributed (cost-shared effort).

Individual effort is expressed as a percentage of the total amount of time spent on work-related activities -- instruction, research (including externally funded research), and administration -- for which the College compensates an individual.

Effort reporting is the mandated method of certifying to the granting agencies that the effort charged or cost shared to each award has actually been completed.

What is contributed or cost-shared effort?

Cost sharing represents that portion of the total project costs of a sponsored agreement that are not borne by the sponsor or sponsors of the project. These costs are borne by the College or other non-federal third parties, rather than by the sponsor.

Cost sharing can be required by the sponsor or volunteered by a principal investigator; regardless, any commitment of effort referenced in the project proposal or the award document must be honored, reported, and captured in an effort reporting system.

The difference between effort reporting and payroll distribution

Payroll distributions and effort reports are not the same thing. Payroll distributions are the distribution of an individual's salary, while effort reports describe the allocation of an individual's actual time and effort spent for specific projects, whether or not reimbursed by the sponsor. Thus effort reporting is separate from and can be independent of salary charges. Effort is not just a verification of the salary or payroll distribution. Cost-shared or contributed effort must be included in effort reports.

Who is subject to effort reporting?

Faculty and staff will complete an effort certification if they perform work on sponsored projects that are funded by federal, state and local government entities, and federal pass-through organizations, regardless of whether the effort is paid or unpaid. Non-exempt employees who complete auditable time cards are not subject to effort reporting procedures.

When are Personnel Effort Reports Submitted?

Wofford College uses after-the-fact certification. Faculty and staff submit personnel effort reports to the Business Office after each semester as follows:

Fall – The report covers the period between the first day of fall classes and the first day of spring classes. Reports are distributed by the Business Office on December 15 and are due on February 15.

Spring – The report covers the period between the first day of spring classes and graduation. Reports are distributed by the Business Office on May 15 and are due on June 15.

Summer – The report covers the period between graduation and the first day of fall classes. Reports are distributed by the Business Office on August 15 and are due on September 15.

Completing the Personnel Effort Report

The Personnel Effort Report should include the name of the employee submitting the report, the grant title, grant number, and reporting period. Any grant or non-grant activities performed during the reporting period should be described in the appropriate section of the report. Enter the percent of time spent on grant or non-grant activities in the appropriate box. Enter any administrative or leave time and the distribution of time spent on each in the appropriate fields. The total time should always equal 100%. The employee submitting the report should sign and date the report. The Principal Investigator/Project Director should sign the report and return the completed report to the Business Office.

Approved 6-20-14