

Policy Name: Time and Effort Reporting
Policy Date: September 1, 2002; Revised June 23, 2008
Initiating Department: Research and Biotechnology
Policy Number: OGCM – 021
Application: Institution wide
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Purpose:

To establish compliance with OMB Circular A-21, "Cost Principles for Educational Institutions," Section J.8c(2), After the Fact Activity Records.

Policy:

A labor distribution system is required by OMB Circular A-21, "Cost Principles for Educational Institutions," Section J.8. The methodology for an effort reporting system includes an after-the-fact certification of the percentage of effort directly devoted to sponsored projects, including contributed effort; i.e. cost sharing. The certification also includes a verification that employees are not charging more than 100% of their time to sponsored projects.

All projID's which have persons being paid directly from Federal funds or as a match from other sources must have completed and signed Personnel Activity Reports (PAR) to verify employee time and effort devoted to a grant or contract. The Principal Investigator/Project Director is required to verify the reported employee's time and effort by signing the certification on the PAR.

The planned percentage of salary allocated to a grant or contract shall not exceed the planned percentage of effort to be devoted to the project. The effort presented in the final approved budget of an application or proposal will be the effort upon which PAR information will be audited against. The PAR documents the direct effort on a grant account and all direct salary charges to a grant account. The reports are generated from payroll information. There is also space included on the PAR to be used for the Principal Investigator/Project Director (PI/PD) to add contributed time.

Responsibilities of the Office of Grant and Contract Management:

The Office of Grant and Contract Management (OGCM) will send personnel activity reports (PARs) to principal investigators who have salaries paid on federal projID's after the end of each semester. The direct charged and contributed time certified for each project will be reviewed by OGCM and audited against the final approved budget.

Responsibilities of the Principal Investigators/Project Directors:

Each PI/PD must verify that the report includes the names of all individuals who were paid from project funds; that the percent time listed on the report is accurate with variances during the semester being reflected, and that the contributed time section is completed if the PI/PD or any of his/her staff spent time on the project while being paid from other sources. If, after reviewing the PARs, the PI/PD determines that corrections are needed to the actual payroll charges, these corrections must be made immediately and supported by retroactive HRM forms. The corrected HRM should be submitted with the completed PAR and sent to OGCM for approval and forwarding to Human Resources.