

Effort Reporting Policy

The Principal Investigator (PI) is responsible and accountable for compliance with all federal regulations associated with sponsored projects awarded under his or her supervision. Effort reporting is a federal requirement for accepting federal awards dollars. The Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR §200.430 requires that any individual who performs work on a federally funded project must document effort.

Effort Reporting Forms are required when an employee is paid by a federal or federal flow-through grant or has included salary match as part of a federal grant award.

Randolph College uses an after-the-fact reporting system comprised of three reporting periods (fall semester, spring semester, summer). Effort is expressed through percentage and must total exactly 100%. Effort reporting is not based on a 40-hour work week; it is based on the percentage of actual time worked.

Academic Year Effort

Effort that occurs during the reporting periods that fall within the academic year (fall and spring semesters) should include activities that comprise an employee's Institutional Base Salary (IBS) and salary match for grants. IBS includes all responsibilities and duties outlined in an employee's appointment letter, job description, and the *Faculty Handbook* and/or *Employee Handbook*. Extra service pay and incidentals are not included in Effort Reporting Forms, as they fall outside of the employee's IBS responsibilities. IBS does not include income that an employee is allowed to earn outside of College duties (See the *Faculty Handbook*).

Summer Effort

In the summer, effort includes all activities for which an employee is paid by the College, activities supported by the College, and activities related to College work. Incidental activities and extra service pay activities do not occur in the summer.

Salaried Employees

All salaried employees who work on a federally funded project are required to complete an Effort Reporting Form. A completed form is required for every reporting period that work is completed and paid for by the funding agency. The PI may obtain the form from the Sponsored Programs Officer.

Hourly Employees

The College requires Effort Reporting Forms for individuals who are paid hourly for work performed on federal grants but who are not set up as employees in the College's payroll system. The PI must sign to certify the effort of these individuals. These individuals are paid through accounts payable for contract labor rather than through payroll as a College employee. Effort Reporting Forms are not required for College hourly employees because the College requires them to complete online timesheets, which must

be approved by the PI before any payroll is paid for hours worked on federal or other sponsored grants. These approved timesheets document effort in lieu of an Effort Reporting Form.

Supporting Documentation for Effort Calculation

When preparing Effort Reporting Forms, faculty and staff will refer to timesheets, calendars, schedules, telephone logs, meeting minutes, etc. to help refresh their memories for actual dates and time worked. These documents will be used by external auditors or other reviewers, if necessary. PIs should maintain these records for three years after the end of the grant period.

Certification of Effort

Federal regulations require the individual who certifies effort to have first-hand knowledge of the employee's activities. This requirement is met by the employee's signature on his or her own Effort Reporting Form, except in pre-approved situations where there is clear supporting documentation, e.g. a leave of absence, in which an employee can certify effort for another employee.

Effort Reporting Form Due Date

Signed Effort Reporting Forms must be submitted to the Sponsored Programs Officer within 90 days of the end of the reporting period (e.g. fall semester, spring semester, summer). If the employee elects to email the form despite the risk of compromised data, the email must include a PDF of the signed form or the form with an electronic signature. The email must be sent from the employee's Randolph College email address.

Effort Reporting Form Review, including Overpayment of Funds

The Sponsored Programs Officer and Business Office will review completed Effort Reporting Forms. During the review, the Business Office will reconcile differences between payment and effort. If an employee was paid more than correlates with her or his effort within the College's degree of tolerance, the employee must return the overpaid funds to the College. The College will ensure any overpaid funds are returned to the appropriate funding source.

Degree of Tolerance

All individuals signing Effort Reporting Forms certify that the percentage distributions of activities represent a reasonable estimate of the work performed. The College's degree of tolerance is +/- 5% (five percent).

Effort Reporting Form Modifications and Errors

Sometimes there are legitimate reasons to modify the effort on a project subsequent to certification. Legitimate reasons do not include manipulating funds for budget purposes or to charge one grant to cover work activity expended for another project or work related duty. Any request for retroactive adjustment requires a revised Effort Reporting Form and an Effort Reporting Error Reconciliation Form that clearly sets forth why previous effort was erroneously certified, and why the requested change is more appropriate within the context of the law, federal requirements, and College policies and procedures.

The Effort Reporting Error Reconciliation Form and revised Effort Reporting Form must be submitted to the Sponsored Programs Officer within 45 days of the discovery of an effort reporting error. These forms will be reviewed by the Sponsored Programs Officer and the Business Office to ensure the error is appropriately resolved. Blank forms may be obtained from the Sponsored Programs Officer.

Effort Reporting Form Retention

Completed Effort Reporting Forms are maintained in the Office of Sponsored Programs. Copies of submitted forms will be given to the Office of Human Resources after review by the Business Office and the Sponsored Programs Officer.