I. PURPOSE

As a recipient of extramural funds for sponsored projects, Emory is accountable for the amount of time committed to work on sponsored projects. This committed time is generally referred to as effort. Effort reporting is the method to confirm that effort promised on a sponsored project, including any committed cost share effort, has actually been delivered. This document describes the process for reporting and certifying effort at Emory.

II. INTRODUCTION

OMB’s Uniform Guidance requires that institutions receiving federal awards maintain systems and procedures for documenting the distribution of effort and associated payroll charges to each individual sponsored agreement. Effort certification is our means of providing assurance to sponsors that faculty and staff have met their commitments, paid or unpaid to sponsored projects. Though these regulations relate to federally funded projects, the principles should be applied to other extramural funds, unless the specific Notice of Award (NOA) is more restrictive. Emory’s Effort Reporting Policy can be found at - http://policies.emory.edu/7.17.

Paying salaries with federal funds requires an institution to have an effort reporting system that provides records on how individuals participating in federally and non-federally funded sponsored agreements appropriately allocate their time to meet their effort commitments on sponsored projects. A person must show effort that is commensurate with the time commitment on any sponsored project where they are listed as the Principal Investigator (PI), including non-federal clinical trials.

Effective effort reporting requires the coordination and active engagement of the Controller’s Office Financial Analysis and Cost Studies (FACS) with the RAS units, business administrators (School/unit, Departmental and/or Divisional) and faculty members. Each Post Award Administrator in RAS units with responsibility for effort reporting must thoroughly understand the proper method of pre-reviewing the effort form and ensure effort percentages reported on the form reasonably reflect effort expended during the report period, including any committed cost share effort.

All faculty members must certify their own effort certification forms. All other individuals should certify their own effort whenever possible if they have knowledge of the specific projects they are working on during the period. If that is not possible, a “responsible person with/using suitable means of verification that the work was performed” may sign the certification. This means that anyone signing for another individual must either have first-hand knowledge or verifiable documentation of the work performed. An effort certification
report is a legal document stating that the certifier confirms the effort on the sponsored project(s) is accurate and appropriate. **This document will be examined by auditors in the event of an audit.**

Effort is not based on a 40-hour work week. Effort is based on 100% of an individual’s activities for which he or she is compensated by Emory University in their Institutional Base Salary; regardless of the amount of time it takes that individual to complete his or her duties. A PI generally should not be paid 100% from sponsored projects and have other responsibilities such as teaching, administrative/committee work, departmental chair, proposal submission for new awards, etc. Please refer to local School or business unit guidelines regarding the maximum effort percentage allowable on sponsored projects.

Federal awards such as those from the Department of Health and Human Services (DHHS) typically restrict the amount of direct salary paid on their grants, commonly known as the “salary cap.” For individuals whose salary exceeds the applicable salary cap, a thorough review of the effort must be completed to ensure that no amounts are being paid above the cap. Salary in excess of the DHHS Salary cap is unallowable and must be corrected by either transferring charges off or cost-sharing to increase the effort percent, whichever is applicable. The Effort Salary Cap report in EBI should be used before reviewing effort to determine which forms have lines over the cap.

Emory requires semi-annual certification of exempt and non-exempt employee effort certification forms. The semi-annual effort periods are: September – February and March – August.

### III. PROCEDURES

Emory fulfills its effort reporting requirement by using Effort Reporting System (ERS). ERS is a web-based system with electronic routing and email notification for updating and certifying effort certification reports. (See Associated Document 2. Job Aid: Effort Reporting System – Certifier Guide & FAQs). Effort reports are system generated for employees who have effort commitments on sponsored projects regardless of whether their salary is charged to sponsored projects.

The table below shows how the roles in ERS are assigned to Administrators at Emory.

<table>
<thead>
<tr>
<th>Role in ERS</th>
<th>Emory Role</th>
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<tbody>
<tr>
<td>Central Administrator (CA)</td>
<td>FACS</td>
</tr>
<tr>
<td>Division Head (DH)</td>
<td>Appropriate School Level Official (responsible for approving cost transfers)</td>
</tr>
<tr>
<td>Departmental Coordinator (DC)</td>
<td>Department Administrator (DA)</td>
</tr>
<tr>
<td>Sub-Departmental Coordinator (Sub-DC)</td>
<td>RAS Director, Post Award Lead or other department level official designated by DA</td>
</tr>
<tr>
<td>Pre-Reviewer</td>
<td>RAS Post Award Administrator (or other RAS team member as assigned by Sub-DC)</td>
</tr>
<tr>
<td>Certifier</td>
<td>Faculty member (PI or Investigator) or other individual responsible (i.e. research staff members where appropriate) for Effort Certification</td>
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**Effort Certification Process** (See Associated Document 1. **Effort Reporting Management and Certification Checklist**).

1. At the time a grant/contract is awarded, the OSP/FGC will input or verify committed effort into Compass during the award set-up process (See Award Setup SOP # 2003) and set up payroll distributions (See Payroll Distribution Setup SOP #2004).
   a. If at any point changes to effort commitments are required, the RAS should follow the
appropriate Emory guidelines for effort changes (See Changes in Effort SOP #2018).

2. At the scheduled effort reporting period (semi-annual for both non-exempt and exempt employees), FACS Cost Studies Group will initialize a new effort reporting cycle in ERS.
   a. Upon initializing a new effort reporting cycle in ERS, FACS Cost Studies group will ensure a system-generated notification and certification due date is sent to Pre-Reviewers (as per appropriate ERS role).
   b. Sub-DC’s need to ensure that all RAS Post Award Staff are assigned as Pre-Reviewers.

3. The Pre-Reviewer or delegated staff member will perform a pre-review of the effort certification reports, including any cost sharing effort that was committed.
   a. The Pre-Reviewer reviews any pending effort on projects that are actually awarded, but not active, and discusses status with PI. If awards are not active, RAS member will need to follow up with RAS award set up team regarding set up of pending projects. Effort form cannot be completed until pending projects are active in the Compass system.
   b. If there are discrepancies in the payroll amounts or percentages listed on the effort report (i.e. payroll amount listed on effort form does not match employee’s actual pay for the period), Pre-Reviewer will notify FACS Cost Studies group to resolve any payroll discrepancies.
   c. If the payroll amount is incorrectly attributed to a project, a cost transfer may be necessary. The RAS will initiate a cost transfer according to the Cost Transfer SOP (See Cost Transfer SOP #2009). All salary cost transfers are performed using the Compass RST system and must be completed by the RAS and submitted to the FACS Cost Studies Group prior to the established deadlines for RSTs. See the Cost Transfer policy at http://www.policies.emory.edu/7.19 for more information.
   d. Once the Pre-Reviewer has confirmed in the system that the effort report is correct, including any mandatory or voluntary cost-share (See Cost Share and F&A Waiver Approval Process SOP # 1005) and completes Pre-Review, the Certifier will receive an automatic email notification.
   e. After the cost transfer is approved in ERS, the Certifier will be notified from the ERS system to review and certify the effort report within 5 days.
      The Pre-Reviewer will update any relevant non-financial milestones (such as eSNAP) on the Milestones page (at discretion of RAS Director).

4. Once the pre-review is completed and all applicable cost transfers are approved, the Certifier will be notified by the ERS system to review and certify. Certifier will review the effort report to ensure its accuracy:
   a. If Certifier does not agree with the report, they can contact RAS regarding clarification or deny report. If Certifier denies report in ERS, process of effort reporting will need to be repeated, beginning with pre-review.
   b. If Certifier agrees with the report, they will apply an electronic signature confirming that the effort reflects the individual’s effort performed on the sponsored project(s).
   c. If an individual has left the University and they are no longer available to certify their effort, the RAS Director or Department/School Official can certify for this individual. The certifier should insert the following language (assuming it is an accurate description) into the comments field of the specific effort form: “This individual is no longer available to certify his/her effort during this timeframe. I certify that effort assigned to sponsored program activity is consistent with the effort charged to the award for this period and is allowable per the terms of the award.”

5. Pre-reviewer will follow-up with Certifier and offer assistance if there are questions about process or information being certified, but ultimately it is the responsibility of the division/department to ensure certification occurs. In case resolution of differences cannot be achieved, this dispute will be
elevated to the Director of the RAS unit and the AVP, RAS, as needed.

6. **Timing.** Emory’s Effort Reporting Policy states that:
   “All necessary adjustment must be made such that the final amount charged to the Federal award is accurate, allowable, and properly allocated.” To ensure compliance with this requirement, the certification of all effort forms must be completed within 90 days of the end of the effort period and the submission of related cost transfers must be completed by the earlier of (A) within 90 days of the end of the effort period or (B) within 60 days following the end of the award. This requires that all salary cost transfers are processed within this period. In the case that the final invoice and/or report is due earlier than 90 days, the salary costs will be required to be reflected on the sponsored project at an earlier date in order to allow time for final invoicing and/or reporting.”

In order for the PI to have 30 days in which to review and certify their effort report, the Pre-Reviewer must complete their pre-review by the earlier of a) within 60 days of the end of the effort period or b) within 30 days following the end of the award.

**Note:** The entire effort certification process must be completed within 90 days of the end of the effort certification period.

**IV. ROLES AND RESPONSIBILITIES**

**Principal Investigator (PI) or Other Investigators/Research Staff Members:**

- Certifying and applying electronic signature to effort report.
- Contacting RAS unit for clarification regarding effort report, as needed.

**Research Administration Services (RAS):**

- Entering effort commitment information into Compass.
- Conducting a pre-review of the effort certification report for accuracy before sending to PIs or other personnel for certification.
- Initiating the process for cost transfers, if necessary.
- Monitoring effort certification process.
- Offer assistance on process or information being certified
- Updating any relevant non-financial milestones on the Milestones page.

**Divisional Business Manager:**

- Monitoring effort certification process.
- Approving Cost Transfers in Compass RST system to correct ERS.
- Following up with Certifier until effort certification is completed.

**The Controller’s Office, Financial Analysis and Cost Studies:**

- Maintaining Effort Reporting System.
- Initializing a new effort period semi-annually for exempt and non-exempt employees.
- Notifying Pre-Reviewer that new effort reports are available and communicating the deadline for the reporting period.
EFFORT REPORTING MANAGEMENT AND CERTIFICATION CHECKLIST

This checklist is a supporting document for SOP #2016, Effort Reporting Management and Certification. The steps outlined below are a list of the procedures. Please review the SOP prior to completing this checklist for further information and clarification on this process.

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<tr>
<td>□</td>
<td>Refer to Associated Document 2. <em>Job Aid: Effort Reporting System – Certifier Guide &amp; FAQs</em> for using the Emory Reporting System (ERS)</td>
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<tr>
<td>□</td>
<td>Input committed effort into Compass during award setup</td>
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<td>□</td>
<td>FACS initializes new effort reporting cycle in ERS (on a regular basis) and sends notification to Pre-Reviewer</td>
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<tr>
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<td>Pre-Reviewer completes pre-review of effort reports, including any committed cost share.</td>
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<td>If discrepancies found, Pre-Reviewer discusses with PI any pending effort on projects that are awarded, but not active</td>
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<td>□</td>
<td>If changes in payroll amounts are required, cost transfer should be initiated, per the Cost Transfer SOP</td>
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<tr>
<td>□</td>
<td>Certifier reviews effort report to ensure accuracy and apply electronic signature.</td>
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<tr>
<td>□</td>
<td>If Certifier does not agree with the report, they can contact RAS regarding clarification or deny report. If report is denied, process of effort reporting will need to be repeated.</td>
</tr>
<tr>
<td>□</td>
<td>Department/Division Administrator will follow-up with Certifier until report is certified</td>
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