



EFFORT CERTIFICATION

The Office of Research and Scholarship

The University of Texas at
 **TYLER**™

Purpose

- The purpose of this course is to familiarize faculty and their administrative support staff with Federal regulations and UT Tyler's policies and procedures that govern effort commitments, reporting and certification.

Audience

Completion of this course is recommended for:

- Principal Investigators with active sponsored projects
- Department administrative and support staff who provide support to PIs on their accounts (e.g., make grant appointments)

Why are we here?

- External funding for sponsored programs often comes with strings attached
 - Accepting Federal funds means **compliance** with applicable cost principles (2 CFR 200)
 - Universities receiving sponsored research dollars should have appropriate systems, policies and procedures in place to properly document all commitments, including effort
 - UT System Policy (UTS163)

Why are we here?

Effort Reporting has come under increasing scrutiny

- Focus of Federal review and enforcement activity
- Several multi-million dollar False Claims Act settlements
- NSF/OIG audits (recent and ongoing)

Why is there so much emphasis on effort reporting?

Northwestern University

"...knowingly or recklessly overstated..."

Johns Hopkins University - \$2.6 million (2004)

East Carolina University - \$2.4 million (2004)

Harvard University/Beth Israel Deaconess - \$3.25 million (2000 & 2004)

University of Alabama-Birmingham - \$3.0 million (2005)

University of Connecticut - \$2.5 million (2006)

Caltech - \$11K (2007)

Florida International University - \$11.5 million (2006)

Why is there so much emphasis on effort reporting?

Areas of government focus in audits/investigations related to effort reporting:

- Salary charges
- Over-commitments
- Salary cost transfers and cost sharing
- Integration with systems that report time or effort
- Roles and responsibilities
 - Who ensures appropriate salary is charged?
 - Who ensures level of commitment is reasonable?
 - Who signs the reports?
 - Who independently monitors to evaluate system's effectiveness?

Why is there so much emphasis on effort reporting?

Institution	Headline	Source	Date
(multiple)	Researchers Criticized for Poor Time-keeping	Nature	October 2007
University of Pennsylvania	NSF Audit of Penn Finds Systemic Weaknesses in Effort Reporting	Report on Research Compliance	September 2006
Yale University	Yale's Use of Research Grants Attracts Government Scrutiny	Wall Street Journal	July 2006
Florida International University	Florida International U. Agrees to \$11.5-Million Settlement with Government Over Grants Accounting	The Chronicle of Higher Education	February 2005
Harvard University	Harvard Agrees to Pay \$2.4-Million More to Settle Allegations of Overcharging the NIH	The Chronicle of Higher Education	June 2004
Johns Hopkins University	Johns Hopkins U. Settles Federal Charges of Overbilling on Federal Grants	The Chronicle of Higher Education	March 2004
Northwestern University	Northwestern University OK's Settlement in Federal Grant Case	The Chicago Tribune	February 2003

Am I alone in Effort Reporting?

Effort Reporting at UT Tyler is a **SHARED** responsibility.

- Faculty Principal Investigators (PIs/PDs)
- Departmental Administrative and Support Staff
- Department Chairs & College Deans
- Office of Sponsored Programs
- Associate Provost for Research

What is Effort?

- Effort is the amount of time spent on any activity expressed as a percentage of Total Institutional Activities for which an Individual is compensated by UT Tyler.
- **Effort includes:**
 - Sponsored Programs (e.g. grants and contracts)
 - Non-Sponsored Research
 - Teaching
 - Public Service
 - Administrative Duties
 - Other Institutional Activities
- **Effort does not include:**
 - Outside consulting or other income earned outside of duties to UT Tyler
 - Supplemental compensation for non-permanent, incidental work

How do you calculate effort?

- Total Effort = \sum (UT Tyler Activities)
- Total Effort = % Sponsored Activities
+
% Non-Sponsored Activities

Example

Dr. Newton is involved in the following activities:

- Teaches one course = 25%
- Manages three sponsored projects:
 - Apple grant = 25%
 - Gravity grant = 25%
 - Wig contract = 25%
 - Total commitment 25% teaching; 75% grant

Is there a maximum commitment level?

- 100% effort is allowable over the summer provided that the individual cannot perform other activities during that period (e.g. serving on institutional committees, writing proposals, etc.) whose costs are not allowable under the Uniform Guidance, 2 CFR 200.

Principles for determining whether effort is chargeable to a grant

- As the PI, you are responsible for the charges to your grants which includes your effort and the effort of those devoting effort on your grant.
 - If you were interviewed by an auditor, consider how would you defend your decision to charge a particular researcher to a specific grant.
 - Is that person/position listed on the proposal?
 - Do you have suitable means of verifying their work on the grant (i.e.: log books, time sheets, etc.)
 - When in doubt, contact the OSR.

What are we looking for?

- Minimum and maximum levels of effort commitments
- Over-commitments
- Administrative duties
- Summer appointments
- Contributed Effort (aka cost shared effort)

What is Cost Sharing?

- Mandatory Cost Sharing: Required by the sponsor as a condition of obtaining the award. Mandatory cost sharing must be specified in the proposal; otherwise, the proposal will not receive consideration from the sponsoring agency.
- Voluntary Committed Cost Sharing: Cost sharing that is not required by a sponsor, but is nevertheless pledged in the proposal or subsequent communication with the sponsor. This type of cost sharing is often used to reflect accurately the total resources necessary to complete a project.

What is Cost Sharing?

- Voluntary Uncommitted Cost Sharing: Faculty-donated additional time above that agreed to as part of a sponsored agreement.
- In-Kind Contributions: Non-cash contributions provided by the university or third parties.

How is effort related to salaries?

- The salaries paid by UT Tyler to its employees working on Federal grants are generally charged or allocated to those grants on the basis of effort expended
- For example, if 33% of an employee's total effort is expended on a Federal grant, then up to 33% of the employee's salary is chargeable to that grant
- A certified effort report confirms that charges are reasonable in relation to the work performed

Who certifies effort?

It is the responsibility of every Principal Investigator to certify their own effort and the effort of all persons working on their sponsored programs, as they have the best firsthand knowledge of their sponsored programs and can provide suitable means of verification of effort.

■ Examples of suitable means of verification:

- Calendars
- Contemporaneous Meeting Notes
- Travel Records
- Log Books
- Teaching Schedules
- Times Sheets

Who states the PI should?

“Specifically, PIs have primary responsibility for all aspects of the sponsored projects including approval of all charges and ensuring that the research is conducted in accordance with the award terms and conditions.”

(NSF Audit of Payroll Distribution System, Cal Tech, OIG 07-01-013)

Are there exceptions?

- There are some exceptions made for practical reasons (e.g. perhaps the researcher is out of the country or is on temporary leave of absence).
- Federal requirements are that anyone certifying effort for another individual must credibly have first hand knowledge of the individual's actual effort.

Does the ORS certify effort?

Management and oversight of federal programs is the responsibility of the Office of Research and Scholarship and the Provost and Vice President for Academic Affairs Office, but we do not certify effort.

Future of effort reporting: ECRT

	Define	ECRT
Method of distribution	Paper-based	Web-based
Frequency of distribution	Monthly	Semi-annually
Certifiers	PIs	PIs
Review period	Monthly	Six months
Certification window	30 days	30 days

What is ECRT?

- Effort Certification and Reporting Technology is a web-based compliance technology to help research institutions minimize their risk of financial penalties for failing to meet federal regulations regarding effort reporting and salary certification.
- ECRT will be implemented at each component in the UT System, however, ECRT is not currently used by all entities in the UT System

Benefits of ECRT

- Resource Utilization -- automated process to minimize the level of administrative burden with reporting and certification process.
- Enhanced Accountability -- researchers approving effort reports can verify assignments first-hand from any computer via the internet.
- Accuracy -- certification is based on actual time spent, versus budgeted payroll charges and requires completion and return of effort reports in a timely manner.
- Management Reports -- help to provide consistency, validation, and elimination of errors.
- Data Centralization -- electronic archiving of certification data.

ECRT Navigation – Login Screens

https://ecrt.mdanderson.org/ecrt_shared/

THE UNIVERSITY of TEXAS SYSTEM
Nine Universities. Six Health Institutions. Unlimited Possibilities.

In order to fulfill the request for a web resource you have just attempted to access, information must be obtained from your home institution. Please select the institution with which you are affiliated.

Select your home institution

Choose from a list:

The University of Texas at Tyler ▼ Select

Remember for session ▼

or

Search by keyword:

Search

Need assistance? Send mail to [UT System IDM Support](#) with description.

To enter the ECRT Training system, you can enter the URL listed to the left or visit the “Time and Effort” section of the OSR website.

This login page will be displayed.

Select your institution from the drop-down menu and click <Select>

ECRT Navigation – Login Screens

The resource you requested requires you to authenticate.

User ID

Password

Log in

Login gives you 8-hour access without repeat login to protected Web resources.

WARNING: Protect your privacy! Prevent unauthorized use!
Completely exit your Web browser when you are finished.

Copyright © 2005 The University of Texas at Tyler


This login page will be displayed.

Enter your UT Info
Domain username
and password to
login.

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ECRT Navigation – Certifier Actions

**THE UNIVERSITY OF TEXAS AT TYLER**
Effort Certification and Reporting Technology (ECRT)

HomeEffort AdministrationEffort Data & WorkflowEffort CertificationLogout


Hello

Helpful Links

- » OMB Circulars
- » National Institutes of Health: Grants Policy and Guidance
- » Education Department General Administrative Regulations (EDGAR)
- » HHS Grants Policy Statement
- » NSF Proposal & Award Policies and Procedures

Home Page

You are now viewing the effort lifecycle home page. This interactive diagram provides a visual representation of the effort lifecycle, as well as an additional method of navigating the system. If you do not have any options available for a portion of the lifecycle, then you are not responsible for that portion of the lifecycle.



The Effort Lifecycle

Administration

Data & Workflow

Certification

[View Reports](#)

[Certify / View My Effort](#)
[View My Historical Effort](#)
[Certify My Support Staff - Group View](#)

Current Certification Period
No Current Period

Once you login you will be directed to your home page.

From here you can :

- certify effort
- view reports
- view federal databases

Certify My Effort

Certify / View Effort

[Certification Payroll Report](#)[Effort Card PDF Version](#)

Covered Individual: John Lamb - jhl479
Title: ASSISTANT PROFESSOR
Department: 1260000 - SCHOOL OF EDUCATION (1260000)
Email: JOHN_LAMB@UTTYLER.EDU
Status: In Progress For Certification

Location: SCI 236B
Appointment: Full Time
Effort Coordinator:
Certification Period: 09/01/2008 to 02/28/2009

View Period: 09/01/2008 to 02/28/2009

If the value in the "Certified Effort" field does not match your true effort for the period, please contact Mary Andros at Mary_Andros@uttyler.edu.

[Refresh Statement](#)

Accounts [-]	Revised Payroll	Revised Cost Share	Computed Effort	Certified Effort	Certify Checkboxes
Sponsored					
26440080 INTERAGENCY COOPERATION CONTRACT WITH UT SYSTEM TO IMPLEMENT TEACHER PREPARATION PROGRAMS					
26440080AY INTERAGENCY COOPERATION CONTRACT WITH UT SYSTEM TO IMPLEMENT TEACHER PREPARATION PROGRAMS	16.67%	0.00%	16.67%	17%	<input checked="" type="checkbox"/>
Award Total:	16.67%	0.00%	16.67%	17%	
Sponsored Total:	16.67%	0.00%	16.67%	17%	
Non Sponsored					
UTTOTHER All Non-Sponsored Effort	83.33%	0.00%	83.33%	83%	<input checked="" type="checkbox"/>
Non Sponsored Total:	83.33%	0.00%	83.33%	83%	
Grand Total:	100.00%	0.00%	100.00%	100%	All None

[Save](#) [Cancel](#)

The Effort Certification screen must be reviewed by the certifier and then approved to move to the "certification statement". The Certification Payroll report link will show the dollars paid the researcher and how the percentages on this screen were calculated. The effort card PDF will provide a printable PDF of the card. The Sponsored activity appears in the top part of the card and the Non Sponsored activity appears in the bottom part of the card. There are subtotals for each award as well as the Sponsored and Non Sponsored areas.

Certify My Effort

Grand Total:	100.00%	0.00%	100.00%	100%	All None
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Save Cancel

Attachments: N/A

Use the text field below to enter an Effort note. (4000 character max.)

Save Effort Note

Effort Note History
History


This is the bottom of the certification screen.


The total may add to more than 100% because of rounding. This will have no adverse effect on the certification process or statement.


The text box at the bottom allows certifiers to enter comments and notes.


Certify My Effort

Certify / View Effort

 Certification Payroll Report

 Effort Card PDF Version



Covered Individual:
Title: DIR OF TECH PREP
Department: 1255000 - TECH PREP (1255000)
Email:
Status:  Not Certified, Not Processed

Location:
Appointment: Full Time
Effort Coordinator: Mary Andros - mca663
Certification Period: 09/01/2008 to 02/28/2009

View Period: 09/01/2008 to 02/28/2009 ▼

If the value in the "Certified Effort" field does not match your true effort for the period, please contact Mary Andros at Mary_Andros@uttyler.edu.

[Refresh Statement](#)

Accounts [-]	Revised Payroll	Revised Cost Share	Computed Effort	Certified Effort	Certify Checkboxes
Sponsored					
26125580 -SHARP CB 08-31-09					
2612558009 -SHARP CB 08-31-09	100.00%	0.00%	100.00%	100%	<input type="checkbox"/>
Award Total:	100.00%	0.00%	100.00%	100%	
Sponsored Total:	100.00%	0.00%	100.00%	100%	
Grand Total:	100.00%	0.00%	100.00%	100%	All None

Save Certify Cancel

To complete an effort certification, verify the percentage of effort spent on each sponsored award or non-sponsored account and clicks the checkbox next to each line.

The certifier will see an error message if the total certified effort is either less than or greater than 100%.

When all effort has been accounted for, the researcher clicks the “Certify” button below the totals.

Certify My Effort

The certifier is presented with a statement of the action that is taking place.

After a final review of the information on the page and the certification statement at the top, the certifier will click the “I Agree” button under the message.

After this, the user is returned to the Home Page.

The effort card is sent on to the EC for processing, along with any entered notes.

Certify / View Effort

Effort Card PDF Version

I certify that I have used a reasonable means of verification and that the effort percentages shown below for the stated period are a reasonable estimate of activity performed, allocable to the respective projects and activities as shown.

I Agree Cancel

Covered Individual:
Title: DIR OF TECH PREP
Department: 1255000 - TECH PREP (1255000)
Email:
Status: Not Certified, Not Processed

Location:
Appointment: Full Time
Effort Coordinator: Mary Andros - mca663
Certification Period: 09/01/2008 to 02/28/2009

Accounts [-]	Revised Payroll	Revised Cost Share	Computed Effort	Certified Effort	Certify Checkboxes
Sponsored					
26125580 -SHARP CB 08-31-09					
2612558009 -SHARP CB 08-31-09	100.00%	0.00%	100.00%	100%	<input checked="" type="checkbox"/>
Award Total:	100.00%	0.00%	100.00%	100%	
Sponsored Total:	100.00%	0.00%	100.00%	100%	
Grand Total:	100.00%	0.00%	100.00%	100%	

Attachments: N/A

Certify My Support Staff – Group View

Home Page

Current Certification Period

No Current Period

You are now viewing the effort lifecycle home page. This interactive diagram provides a visual representation of the effort lifecycle, as well as an additional method of navigating the system. If you do not have any options available for a portion of the lifecycle, then you are not responsible for that portion of the lifecycle.



[View Reports](#)

[Certify / View My Effort](#)
[View My Historical Effort](#)
[Certify My Support Staff - Group View](#)

All PI's also have the responsibility of certifying the effort of any non-certifier's working on their awards.

In this process, the PI should select "Certify My Support Staff – Group View," which will display one continuous effort card for all support staff associated with their sponsored projects.

Certify My Support Staff

Certify My Support Staff - Group View

The Certify My Support Staff - Group View page allows a user to quickly view other users who are related to your work. For example, if you are a Principal Investigator, you will most likely see those people who are associated to your grants. If you are an effort coordinator or administrator, you will see those users associated to you only if you a PI on the account.

[Save All](#) [Certify All](#) Displaying Certifiers 1 to 10

1 of 2 Pages [Next >](#)

Covered Individual: Bextine, Barbara - bb23275
Job Title: PROJECT COORDINATOR
Department: MATH & SCI INSTITUTE (4203000)

Certification Period: 03/01/2008 to 08/31/2008



Accounts [-]	Revised Payroll	Revised Cost Share	Computed Effort	Certified Effort	Certify Checkboxes
Sponsored					
26121087 CONSORTIUM FOR STEM PREPARATION FOR ENGINEERING 84.116Z AWARD #P116Z080162 DEPT OF EDUCATION					
2612108720 CONSORTIUM FOR STEM PREPARATION FOR ENGINEERING 84.116Z AWARD #P116Z080162 DEPT OF EDUCATION	0.00%	0.00%	0.00%	<input type="text" value="0.00%"/>	<input type="checkbox"/>
Award Total:	0.00%	0.00%	0.00%	0.00%	
Sponsored Total:	0.00%	0.00%	0.00%	0.00%	
Non Sponsored					
UTTOTHER All Non-Sponsored Effort	0.00%	0.00%	0.00%	<input type="text" value="0.00%"/>	<input type="checkbox"/>
Non Sponsored Total:	0.00%	0.00%	0.00%	0.00%	
Grand Total:	0.00%	0.00%	0.00%	0.00%	

The effort card displayed for the PI is formatted to look exactly like the effort card they saw under “Certify My Effort”.

The procedure here is the same, they must enter certified percentages, and click the check boxes before pressing the submit button.

Certify My Support Staff

Certify / View Effort

 Effort Card PDF Version 

I certify that I have used a reasonable means of verification and that the effort percentages shown below for the stated period are a reasonable estimate of activity performed, allocable to the respective projects and activities as shown.

To finish the certification, the PI must press the “I Agree” button.

Once that is completed, the effort card is passed to the department EC for processing.



LET'S TRY ECRT!