

HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES

Chapter 7	Research and Sponsored Programs	Effective:	January 2007
Section 7.1	Office of Sponsored Programs	Revised:	
Policy 7.1.3	Effort Certification on Sponsored Programs	Responsibility:	Vice President for Research

EFFORT CERTIFICATION ON SPONSORED PROGRAMS

Overview

Effort certification is a federal requirement. As a condition of receiving federal funding, institutions must maintain an accurate system for reporting the percentage of time (i.e., effort) that employees devote to federally sponsored projects.

In addition, federal and state agencies, private foundations, organizations, and industry provide significant funding to enable the Health Science Center to conduct research, training, and public service projects. The Health Science Center's effort certification system assures these external sponsors that funds are properly expended for the salaries and wages of those individuals working on projects they sponsor. It provides the principal means for certifying that the salaries and wages charged to sponsored projects are consistent with the effort contributed. All employees involved in certifying effort must understand that the Health Science Center could face severe penalties and funding disallowances should effort certifications be inaccurate, incomplete, or untimely.

Finally, sponsors and auditors must also be able to verify that effort expended in support of a project but not paid by the project has been performed as promised; this effort is cost-sharing by the Health Science Center.

Policy

It is the policy of the Health Science Center that employees certify the accuracy of percentage of time (i.e., effort) that is charged to sponsored projects. In addition, commitments of effort made to the sponsor in the funding proposal must also be certified. For the purposes of this policy, effort is measured in terms of percentage and not in terms of hours worked.

Definitions

COMMITTED EFFORT: The amount of time that an individual (generally a faculty member) commits to a specific project and is identified in a proposal for funding. Committed effort may not always equal paid effort. For those projects in which no effort is designated in a formal application, a minimum of 1% must be committed at time of award (this requirement is effective September 1, 2007).

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EFFORT: Work or the proportion of time spent on any activity and expressed as a percentage of total time. Total effort for an employee must equal 100%. The appointment serves as the basis for an individual's total effort. In other words, for a 50% appointment, 100% effort is the 50% appointment.

EXEMPT STAFF: A staff member who is exempt from the overtime requirements of the Fair Labor Standards Act but who is not a faculty member.

FACULTY: An individual holding an academic rank of instructor or above without regard to tenure status or track.

NON-EXEMPT STAFF: A staff member who is not exempt from the Fair Labor Standards Act and must be paid overtime for work over forty hours in a single week.

PLEDGED EFFORT: Synonymous with committed effort.

SPONSORED PROGRAM: A sponsored program involves a specific commitment of time and can be either: 1) a formal award, such as a contract, grant, or cooperative agreement, is made to the Health Science Center for a research, training, public service, or other activity; or 2) an internally funded project which is the result of a formal application and approval process and for which the activity is separately budgeted and accounted for.

Who Must Make Effort Certifications

Effort certification is required of any individual who either receives salary from or has committed effort (pledged effort) from a sponsored program which is funded either from federal sources or is otherwise classified under OMB Circular A-21 definitions as "Research".

The actual effort certification must be made either by the individual through the Health Science Center's effort certification system or by a responsible individual who can reasonably verify the effort of that individual for whom the certification is being made. Such a responsible individual should be a supervisor, the Principal Investigator of the award under which the individual to be certified is being compensated, or the

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department Chair/Director of the department of the individual to be certified.

Frequency Of Certification

Faculty and Exempt Staff: Semi-annually for the reporting periods September 1 through February 28 and March 1 through August 1 of each fiscal year.

Non-Exempt Staff: Monthly.

Certifications must be made within thirty days of notification of the Office of Sponsored Programs that the effort is ready for such certification.

Total Health Science Center Effort

The federal government acknowledges that practices vary among and within institutions as to the activity constituting a full workload. Accordingly, the Health Science Center is permitted to express effort in terms of a percentage distribution of total institutional activities. Likewise the government recognizes that effort certification can only reasonably reflect the activity for which an individual is compensated by the Health Science Center and that a precise estimate of the time devoted to each project is not always feasible nor is expected.

Total Health Science Center effort includes only those activities for which an individual is being paid by the Health Science Center. It includes all Health Science Center-related activities, but does not include non-Health Science Center effort.

Some Health Science Center faculty and other employees may also be employed by the South Texas Veteran's Health Care System (VA) under the terms of a Joint Appointment Memorandum of Understanding. The Health Science Center's departments that have employees with VA appointments are responsible for ensuring that the Health Science Center complies with the terms of the agreement with the VA. The Health Science Center and the VA regard the two appointments as separate jobs, with each compensating the individual for services applicable to its own activities. The Health Science Center's A-21 effort certification obligations apply only to the Health Science Center's activities. The Health Science Center is not required to, nor would it be appropriate to, include VA work in the Health Science Center effort certifications.

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Effort Changes After Certification

Changes in effort allocations after certification will only be made if the change is to remove effort certification and/or payroll charges that have been improperly made to the project.

Education Requirements

Each faculty member and those individuals who are designated departmental effort certification representatives are required to complete an effort certification education program provided by the Office of Sponsored Programs.

Administration of Policy

Pursuant to requirements of The University of Texas System, the Vice President for Research is responsible for institutional compliance with this policy. Administration of the policy is the responsibility of the Office of Sponsored Programs. Each Health Science Center department or administrative unit has the primary responsibility to ensure compliance with this policy and shall name a departmental effort certification representative who will work with the Office of Sponsored Programs during the effort certification process. If effort is not properly certified, salary charges must be moved to an unrestricted Project ID.

Effort Certification Procedures

The Health Science Center has developed an on-line, web-based effort certification system. Procedures for certification of effort, as well as the electronic system itself are available at <http://research.uthscsa.edu/osp/effort.shtml>.

Sanctions For Non-Compliance

Failure to comply with the requirements of this effort certification policy and its accompanying procedures could result in the individual being subject to disciplinary sanctions up to and including termination.

References

Federal Office of Management and Budget:

OMB Circular A-21, Cost Principles for Educational Institutions, Section J.10 (http://www.whitehouse.gov/omb/circulars/a021/a21_2004.html)

OMB A-21 Clarification Memo, January 5, 2001 (<http://www.whitehouse.gov/omb/memoranda/m01-06.html>)

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OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements With Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations

(<http://www.whitehouse.gov/omb/circulars/a110/a110.html>)

NIH Grants Policy Statement

(http://grants.nih.gov/grants/policy/nihgps_2003/index.htm)

NIH Guidelines for Inclusion of Clinical Practice Compensation in Institutional Base Salary Charged to NIH Grants and Contracts

(<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-05-061.html>)

The University of Texas System Policy, UTS163, "Guidance on Effort Reporting Policies"

(<http://www.utsystem.edu/policy/policies/uts163.html>)

Health Science Center Policy on Managing Effort Commitments

(<http://www.uthscsa.edu/hop2000/7.1.4.pdf>)

Health Science Center Cost Transfer Policy

(http://research.uthscsa.edu/osp0/forms/cost_transfers_to_federal_awards_policy.doc)
