Effort Reporting Essentials for Principal Investigators

Topics

- Effort certification compliance overview
- Effort certification process
- Initial **ecrt** certification cycle
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- Effort statement statuses
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Effort Certification Compliance Overview

- As recipients of external funding from both federal and other sponsors the RF must comply with numerous rules and regulations disseminated by the federal government and sponsors

- The federal Office of Management and Budget (OMB) sets forth broad policies governing grant and contract financial administration

  - OMB Circular A-21, Section J.10 outlines acceptable methods for supporting charges related to compensation for personal services on federal grants and contracts (effort certification)

- The rationale for this requirement is that:

  - Salary charges are based on estimates in proposals of how effort will be expended

  - Effort certification verifies how effort was actually expended

Effort Certification Compliance Overview

- Effort Certification:
  - Provides support for salaries charged to sponsored programs (and reimbursed by the sponsor) as well as for cost sharing salary (not reimbursed by the sponsor)
  - Documents that effort commitments were met
- The principal investigator (PI) is responsible to ensure that charges to sponsored programs are:
  - Consistent with the effort expended by those working on the sponsored program as they relate to personnel costs
  - In compliance with federal and RF policies and campus procedures
  - Allowable, reasonable and allocable to the sponsored program charged

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Effort Certification Process

- The RF uses an "after-the-fact" activity record that accounts for the total activity for which employees are compensated

- PIs certify their effort and the effort of staff working on their sponsored program(s)

- A proxy certifier or restricted effort coordinator may be delegated authority to certify effort for a PI

- This individual:

    - Can be another employee, PI or other responsible official with first-hand knowledge of the employee's effort

    - Has suitable means of verifying that the work was performed

    - Is set up within **ecrt** by the campus effort reporting administrator

    - Will receive notifications that would otherwise be sent to the PI

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Effort Certification Process

- Current manual paper-based Oracle effort certification process will change to a new online effort reporting Web-based tool: Effort Certification and Reporting Technology (**ecrt**)
  - Effort certification will be completed using electronic signatures
  - All the payroll detail for the effort reporting period is available within the tool
- PIs (or their designated proxy certifier/restricted effort coordinator) will receive an e-mail prompting them to certify:
  - Their effort
  - The effort of staff working on their sponsored programs (if applicable)

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Effort Certification Process
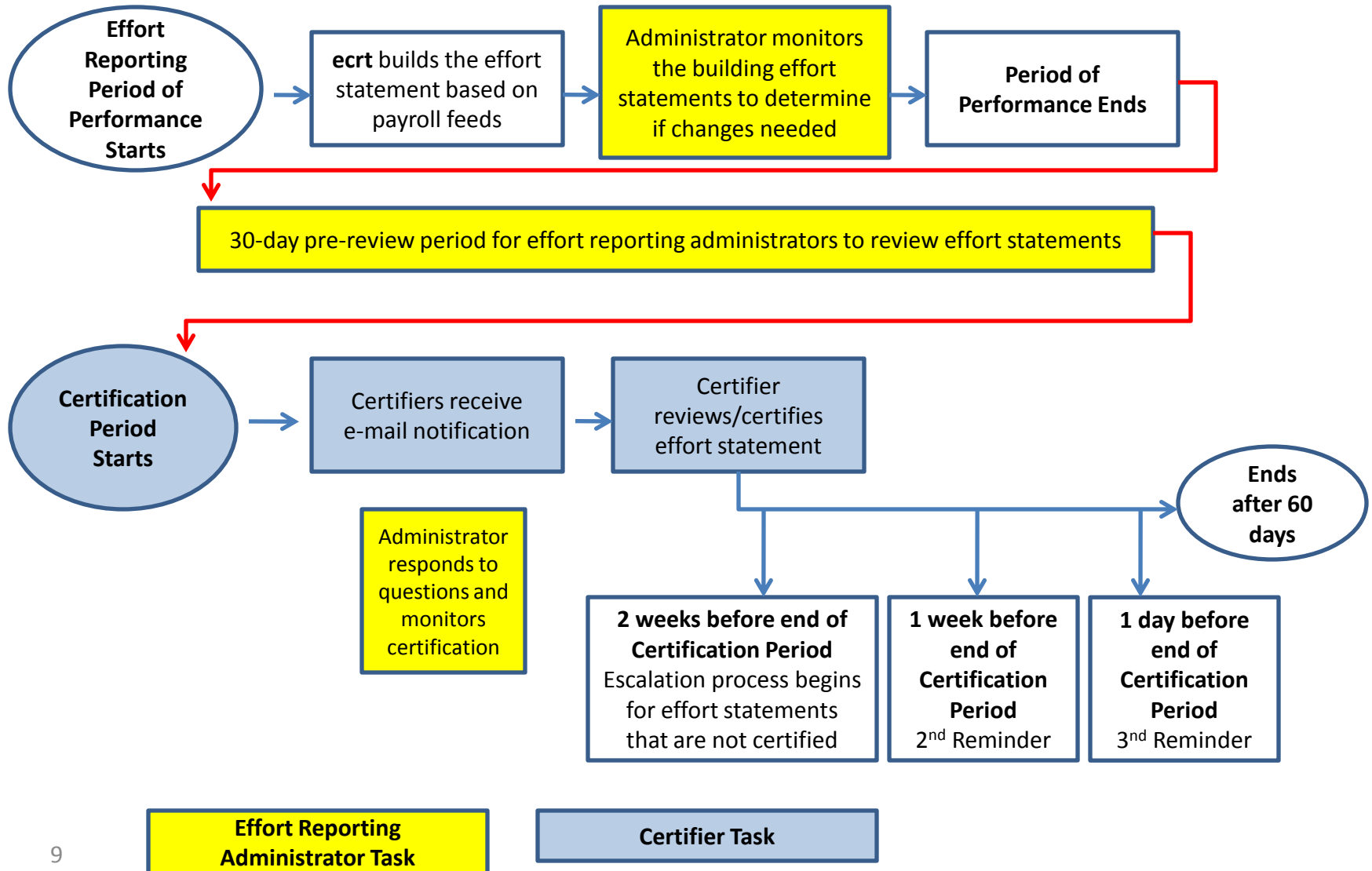
Implementation of **ecrt** will be effective for all campuses:

- **Spring 2013** effort reporting period of performance for campuses that use academic periods

- **January 1 – June 30, 2013** effort reporting period of performance for campuses that use semiannual periods
  - Upstate Medical University
  - SUNY Downstate Medical Center
  - Empire State College
  - System Administration

Initial ecrt Certification Cycle

Dates	Activity	Responsibility
January 1 to May/June 2013	Payroll Data is loaded to **ecrt** and effort statements are building: • SUNY monthly payroll processing • RF biweekly payroll	Automatic process within **ecrt**
May/June 2013 (30-day period)	Effort statements are reviewed Payroll adjustments are processed	Campus Effort Reporting Administrator
June/July 2013	An e-mail is sent to each PI with a link to access **ecrt**	Automatic process within **ecrt**
June/July to August/September 2013 (60-day period)	**"Certification Period" – timeframe for PI to certify their effort and effort of their staff; PI will electronically certify Effort Statements**	**PI (or proxy certifier/restricted effort coordinator)**
2 weeks and 1 week before the end of the certification period	Reminder e-mails are sent to PIs for any effort statements still needing certification	Automatic process within **ecrt**
1 day before the end of the certification period	Final e-mails are sent to PIs to comply with the certification deadline of November 30th	Automatic process within **ecrt**

Effort Reporting Cycle

Effort Reporting Period of Performance Starts → **ecrt** builds the effort statement based on payroll feeds → Administrator monitors the building effort statements to determine if changes needed → **Period of Performance Ends**

30-day pre-review period for effort reporting administrators to review effort statements

Certification Period Starts → Certifiers receive e-mail notification → Certifier reviews/certifies effort statement

Administrator responds to questions and monitors certification

Ends after 60 days

2 weeks before end of Certification Period Escalation process begins for effort statements that are not certified

1 week before end of Certification Period 2nd Reminder

1 day before end of Certification Period 3nd Reminder

Effort Reporting Administrator Task

Certifier Task

Data in ecrt

The Oracle business system is the system of record for all source data that is uploaded to **ecrt**

- **Payroll file**: SUNY monthly salary – through the IFR/Cost Sharing processing, RF biweekly payroll, labor schedule charging instructions, distribution adjustments (salary cost transfers)

- **Award file**: Award full name, companion cost share awards, award start and end dates, award PI, budget amount, etc.

- **Commitment file**: Committed effort data for PIs, co-PIs and other key personnel

- **Certifier File**: Includes PI e-mail address, actual department name and actual job title information. All SUNY monthly and RF employees with a role of PI on a sponsored award will be assigned the role of self-certifier in **ecrt**

- **Sponsor File**: Includes sponsors and award type of federal, nonfederal and nonsponsored (includes other institutional activity)

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Effort Statement Statuses

The table below illustrates the most common **ecrt** effort statement statuses

Effort Statement Status	Definition
Ready to be Certified	The effort statement is ready for PI, Proxy Certifier or REC review and certification.
Building, Not Ready for Certification	An effort statement is being built for the current effort reporting period of performance. Salary expenditures will be applied to applicable awards each pay period.
Certified	The effort statement was certified and the certification process is complete.
Certified, Ready for Administrator Review	The effort statement was certified by the PI, Proxy Certifier or REC with a note and/or attachment.

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Training Curriculum

PIs should review the following materials that are available on the RF public Web site:

- Video simulations:
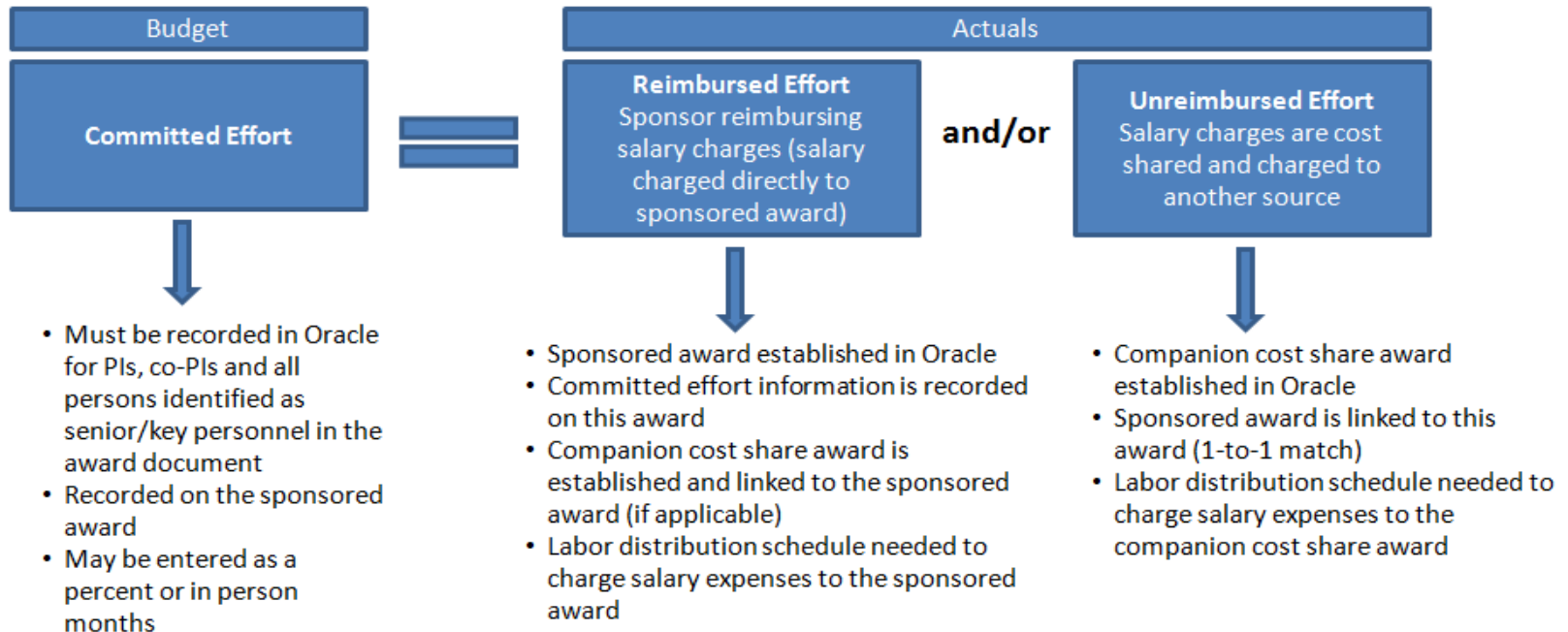   - Introduction to the Effort Reporting Electronic Tool
    - Certify my Effort
    - Certify my Effort and the Effort of my Staff (if applicable)
- "How to" documents with step-by-step instructions for each of the simulations
- Additional Information:
    - Effort Statement Statuses Guidance Document
    - Glossary of Terms

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Committed Effort

Effort Certification
Federal regulations require effort certification for anyone with salary charges that are reimbursed or cost shared to a *federal or federal flow-through award*

Whose effort is certified?	Who certifies that effort?
Principal investigator (PI)	PI **or** designated proxy certifier/restricted effort coordinator
Co-PI	Co-PI **or** designated proxy certifier/restricted effort coordinator
Key/Senior personnel	Key/senior personnel **or** designated proxy certifier/restricted effort coordinator
Research staff	PI **or** designated proxy certifier/restricted effort coordinator

Budget

Committed Effort

Actuals

Reimbursed Effort
Sponsor reimbursing salary charges (salary charged directly to sponsored award)

and/or

Unreimbursed Effort
Salary charges are cost shared and charged to another source

- Must be recorded in Oracle for PIs, co-PIs and all persons identified as senior/key personnel in the award document
- Recorded on the sponsored award
- May be entered as a percent or in person months

- Sponsored award established in Oracle
- Committed effort information is recorded on this award
- Companion cost share award is established and linked to the sponsored award (if applicable)
- Labor distribution schedule needed to charge salary expenses to the sponsored award

- Companion cost share award established in Oracle
- Sponsored award is linked to this award (1-to-1 match)
- Labor distribution schedule needed to charge salary expenses to the companion cost share award

Committed Effort

- Commitment of effort in a proposal, once awarded, is recorded in the Oracle business system for PIs and key personnel

- Effort commitments trigger the necessity to complete an "IFR/Cost Sharing Appointment Form"

- If key personnel intend to reduce their effort on sponsored programs by more than 25 percent the institution needs to notify the sponsor and receive approval

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Summary

- PIs (or their designated proxy certifier/restricted effort coordinator) will receive an e-mail at the end of each effort reporting period of performance with a link to access **ecrt**

- PIs are encouraged to review the **ecrt** training simulations and related documents

- Use of the **ecrt** system is intended to reduce administrative burden while maintaining a compliant system

- Additional information is available from your campus effort reporting administrator or sponsored programs office

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