

Grant and Contract Accounting Office Effort Reporting on Sponsored Projects

Effort Certification

Effort Report Certifications (ERCs) are quarterly reports designed to track the effort of individuals who have been paid from and/or committing sponsored project effort on a federal award. A individual receives an ERC if he or she is paid by Central Washington University and

- Performs effort paid on federally sponsored projects;
- And/or performs cost sharing on federal sponsored projects.

The purpose of the ERC is to certify that the remuneration received was a reasonable reflection of the effort committed by the employee. This process supports the Uniform Administrative Requirements for federal awards as prescribed in 2 CFR 200.

What is Effort?

For the purposes of sponsored agreements, effort is the time an individual spends on their university activities, including research, instruction, administration and service.

What is Institutional Base Salary (IBS)?

Institutional base salary is the annual budgeted compensation paid by Central Washington University for an employee's appointment, whether that individual's time is spent on research, instruction, administration or service. Typically, this figure is based upon their nine month appointment. Institutional base salary excludes any income that an individual is permitted to earn outside of duties for Central Washington University.

Faculty Work Week

A faculty work week is the average number of hours a faculty member normally works during a week. Hours are to be averaged over the effort reporting period. For many faculty this number will vary from one week to another. On average, each faculty work load unit equates to 30 hours (32hrs prior to 2/29/20), 150 hours per month (5wlu), 450 hours per effort reporting period (15wlu) and 1,350 hours per nine month assignment (45 wlu).

Charging salaries

Salaries should be charged to sponsored projects by determining the percentage of the faculty member's average work week devoted to the project and charging no more than that percentage of the faculty member's IBS to the sponsored project.

Senior Personnel Effort on NSF Sponsored Projects

As a general rule under the revised NSF policy, salary for Senior Project Personnel is limited to two months from all NSF-funded grants and can be proposed for the summer and/or academic

year. The revised NSF policy identifies the salary limit as applicable to “any one-year”. CWU defines the one-year period as a rolling twelve-month period per individual across all funding sources.

The NSF Grants Policy Guide (GPG) defines senior personnel as:

1. (co) Principal Investigator(s) – the individual designated by the proposer, and approved by NSF, who will be responsible for the scientific or technical director of the project.
2. Faculty Associate (faculty member) – an individual other than the Principal Investigator(s) considered by the University to be a member of its faculty or who holds an appointment as a faculty member at another institution, and who will participate in the project being supported.

Based upon the NSF Grants Policy Guide, the following employees are not considered senior personnel:

1. Post doctoral professionals
2. “Soft funded” employees (“research faculty”, research scientists, and similar individuals who are normally supported through sponsored-funding, i.e. their positions are not supported by permanent operating budget dollars)
3. Research scientists not budgeted as senior personnel
4. Other personnel not budgeted as senior personnel

Certifying effort

On the ERC, individuals certify to their grant effort (both paid and committed) as a percentage of total University effort.

Faculty generally have responsibilities for such activities as non-sponsored research, instruction, administration or service that would preclude their devoting 100% effort to sponsored activities. Proposal preparation for new and competing renewals would also preclude faculty from devoting 100% time to research. Accordingly, faculty, department administrators, and department chairs should assure each reporting period, including summer for those on a quarterly reporting period, that there are no other activities required of the faculty member that would reduce the effort available for sponsored activities during that period. Salary support for teaching, administration, service, institutional governance and proposal preparation effort must come from non-sponsored funds, except for normal scholarly activity during summer time outside of the main nine-month academic year and sponsored projects specifically awarded for those purposes.

Although all university activities must be included in a faculty member's effort for reporting purposes, not all of a faculty member's professional activities must necessarily be considered university activities. For example, outside professional work and volunteer community or public service are types of activity that would normally be deemed non-university activities. Interdepartmental consulting for which supplemental compensation is paid and service on review panels or other advisory activities for federal sponsors that include an honorarium and/or travel reimbursement are also considered outside of total effort.

Change in Level of Effort

2 CFR 200 requires grantees to obtain the sponsoring agency's approval in writing if the PI or key personnel specifically named in the Notice of Grant Award (NGA) will:

- Withdraw from the project entirely;
- Be absent from the project during any continuous period of 3 months or more; or
- Reduce time devoted to the project, by 25 percent or more, from the level approved at the time of award.

This rule applies to all federal grants unless waived in writing by the sponsor. The sponsoring agency must approve in advance any alternative arrangement proposed by the grantee, including any replacement of the PI or key personnel named in the NGA.

The effort commitment (both paid by the sponsor and paid by the University) at the time the award is issued is considered the threshold against which reductions of 25% or more need to be requested and approved in advance. In order to be in compliance, the PI should compare the original commitment in the award document against actual grant effort on the ERC.