

**NOVA SOUTHEASTERN UNIVERSITY
OFFICE OF SPONSORED PROGRAMS
POLICIES AND PROCEDURES**

AWARD MAINTENANCE

EFFORT REPORTING

EFFECTIVE 12-01-08, REVISED 03-01-12, REVISED 09-01-13, REVISED 12-26-14

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PURPOSE:

The university is required to comply with the requirements of the United States Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200.430 which governs payroll distribution of salary and wage compensation charged to federally sponsored projects. While a university can initially charge federally sponsored projects based on estimates of labor (effort) that are anticipated to be contributed by its employees (established in their appointments) for interim accounting purposes, university officials are required to subsequently confirm that the labor costs reported and ultimately charged to a sponsored project reasonably represent the actual efforts expended by each employee. Sponsored projects may not be charged for more effort than actually expended on a project, and therefore, payroll charged should not exceed effort expended. This policy governs the process of certifying the effort of university employees whose salaries (or portions thereof) are charged or cost shared to sponsored projects regardless of the source.

POLICY:

NSU's policy is to comply with all of the federal requirements contained in *OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, 2 CFR Part 200.430, paragraph (i) Standards for Documentation of Personnel Expenses. As per these requirements, NSU uses "after-the-fact" quarterly effort certification records which are managed by an electronic system called Effort Certification and Reporting Technology (ECRT). Through the use of ECRT, effort cards must be certified on a quarterly basis for all university employees who are exerting some effort on a sponsored project, including faculty, professional staff, exempt staff, non-exempt staff, graduate assistants, post-doctoral fellows, and researchers. Each effort card will be certified to verify the accuracy of the percentages of effort charged to sponsored and non-sponsored activities.

Commitments made to a sponsor (whether made in the proposal, budget, agreement, etc.) must be met. Commitment of an individual's effort greater than 100% is not permitted. Employees who have institutional responsibilities should not be committed 100% to sponsored projects since effort for institutional activities is not allowable on sponsored projects (i.e. teaching, internally funded research projects, proposal writing, serving on institutional compliance committees, etc.). Further, Principal Investigators/Project Directors (PIs/PDs) should have at least a minimum level of effort (whether committed or uncommitted to the sponsor) on each sponsored project to account for their financial, scientific, and compliance oversight of the sponsored project (exceptions will be determined on a case-by-case basis, for example, equipment grants or doctoral dissertation grants). Typically, PIs/PDs and other key personnel named in the award document may not reduce their effort on a sponsored project by more than 25% (or be absent from the project by more than three months) without prior written approval from the sponsor (also refer to OSP Policy No. 29 – *Personnel Changes* and OSP Policy No. 39 – *Prior Approval Requirements*). The PI/PD is responsible for notifying the Office of Sponsored Programs (OSP)

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if they anticipate such a reduction in effort in order to coordinate prior approval from the sponsoring agency. It is not sufficient to simply communicate the change to the sponsor's Program Officer.

Changes between actual and estimated effort of greater than 5% represent significant changes that must be corrected in the university's Banner financial system (An example of a significant change: if the payroll percentage for a sponsored project is 5% and PI certifies 7% effort, the percent change would be 40% $[(7-5)/5]*100$). Further, once an effort card has been fully processed, no additional salary charges in excess of the certifier's corresponding effort certification may be made without an approved recertification request (see #7 below).

All NSU employees with effort charged, or cost-shared, to sponsored projects must follow this policy and procedure when reporting their effort on sponsored projects. Each college/center within the university has the primary responsibility to ensure compliance with this policy. If the time and effort of any college/center employee is not properly or timely certified in accordance with this policy, there may be grounds for adverse personnel action.

DEFINITIONS:

Administrative Review Period: The month-long period that immediately follows the quarterly period of performance, falling between the end of the quarterly period of performance and the start of the certification period where Effort Coordinators (ECs) and PIs are responsible for reviewing effort cards and reconciling any discrepancies.

Central Effort Administrator: The Central Effort Administrator (CEA) at OSP is responsible for implementation and oversight of this policy.

Certification: The assertion by an employee with suitable means of verification that the work was performed, stating that salaries and wages charged or cost shared to sponsored projects as direct charges are reasonable in relation to work performed over the quarterly period of performance period.

Certification Activities: Brief descriptions of activities worked on each sponsored project that must be completed on the effort card.

Certification Period: The month-long window of time immediately following the administrative review period during which an effort card must be completed. This includes certification by the individual who has suitable means of verification that the work was performed, review by the Dean, and processing by the effort coordinator.

Commitment of Effort: The amount of time that an employee has agreed to work on a sponsored project, as specified in the proposal or award document, regardless of whether salary support is requested. When effort is quantified in a proposal, it becomes a binding commitment when an award is made.

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Commitments of effort must be met and tracked for the PI/PD, all co-investigators, and all key personnel listed in the grant proposal. If no personnel commitments are quantified in the grant proposal, only the PI/PD's commitment must be met (which may be minimal) and tracked. A commitment is not the same as the actual effort worked each quarterly period of performance, but is a projected amount of time that is to be achieved over a specific period of time in relation to the sponsored project (i.e. the budget year). Typically, key personnel named in the award document may not reduce their effort on a sponsored project by more than 25% (or be absent from the project by more than three months) without prior approval from the sponsor.

Cost sharing: The terms "cost sharing," "matching," and "in-kind" refer to that portion of the total sponsored project costs not borne by the sponsor. Cost shared effort may be mandatory or voluntary, but if promised in the sponsored agreement, it must be reported and certified as applied to the sponsored project. See OSP Policy No. 36 – *Cost Sharing or Matching*.

ECRT Quarterly Status Report: Submitted 45 days after the end of the certification period, this report serves to document the final status of the user compliance and processing of cost transfers in the quarterly period of performance as of the reporting date.

Effort: The proportion of time spent by an employee on one university activity expressed as a percentage of total time spent on all NSU activities. Because the number of hours required for any one activity changes over time, effort is reported as a percentage of total activities rather than the number of hours worked. 100% effort is an employee's total time actually spent on university work within the scope of his or her employment regardless of how many or how few hours an employee works in a reporting period; total time spent on university activities can be different for each person. The total effort reported for an employee must equal 100%. It includes both *sponsored project activities* (i.e., directing or participating in any aspect of the research related to the specific project; providing research patient care; writing progress reports for the project; holding a meeting with staff to discuss specific aspects of the project; activities contributing and intimately related to the work under the agreement such as consulting with colleagues, presenting results, mentoring staff working on the project; etc.) and *non-sponsored activities* (i.e., administrative, instructional, clinical, community/service, service on institutional committees, effort expended to prepare proposals, and research activities without any external funding). There is an expectation that exempt employees work the hours necessary to carry out the professional responsibilities of their position and therefore, total effort for exempt faculty and staff includes work performed outside of the normal work schedule, work performed on vacation, and work performed off-campus. This does not include work performed outside of an employee's university appointment, such as overload, paid or unpaid consulting outside of NSU, advisory activities for sponsors regardless of whether compensation is received, peer review of manuscripts, leadership in professional societies service on peer review panels, VA appointments documented in a Memorandum of Understanding, unpaid absences, lectures or presentations where non-NSU compensation is received, etc..

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Effort Card: The form generated in the ECRT system that is used to certify effort and is the final attestation of effort for a particular quarterly period of performance once certified.

Effort Certification: NSU's means of providing assurance to sponsors, especially the federal government, that employees charged to sponsored projects have met their commitments, paid or unpaid by the sponsor, to sponsored projects and that the salaries charged to sponsored projects are reasonable in relation to the work performed.

Effort Certification and Reporting Technology (ECRT): The web-based system used to facilitate NSU's effort reporting and certification process.

Effort Coordinator (EC): The individual who administers effort reporting and ECRT system use in each college/center/department. One primary effort coordinator is designated for each college/center/department with the option of having secondary effort coordinators, if appropriate, as determined by the college/center/department.

Exempt Staff: All executive, administrative or professional employees who are paid for work done, not the number of hours worked. Please refer to the Office of Human Resources Employee Policy Manual, Policy # 35 – *Employee Classification and Types of Employment* for more information.

Institutional Base Salary (IBS): The annual compensation paid by the university for an individual's appointment for job duties as described in the employee's job description and/or contract (or as modified via written addendum), whether that individual's time is spent on research, instruction, administration or other activities. IBS includes stipends for administrative duties but does not include incidental, one-time payments, overload compensation, or any income that an individual is permitted to earn outside of duties for the university. All salaries charged to sponsored projects will be based on an individual's Institutional Base Salary. IBS may not be increased as a result of receiving a sponsored award. A part-time employee's appointment percentage may be increased up to full-time as a result of receiving a sponsored award as long as the rate of pay remains consistent. See OSP Policy No. 31 – *Salaries, Wages, and Overload Payments* that addresses requirements for salary compensation under sponsored projects.

Key Personnel: A person who contributes to the scientific or scholarly development or execution of a project in a substantive, measurable way. In the context of establishing commitments and tracking effort, a key person is defined as the PI/PD and all individuals explicitly listed as key personnel in the proposal and/or award document (including any co-investigators). In situations in which the proposal does not explicitly list key personnel, NSU defines key personnel as the PI/PD.

Non-Exempt Staff: Non-exempt employees are subject to the Wage and Hour provisions of the FLSA making them eligible for 1.5 times their base rate of pay for each overtime hour worked above forty (40) hours in a workweek. The primary duties of non-exempt employees consist of the performance of technical, clerical, custodial, maintenance work, and other paraprofessional activities. Non-exempt

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employees are required to record all hours worked per pay period by completing time sheets and having them approved by their supervisor. Please refer to the Office of Human Resources Employee Policy Manual, Policy # 35 – *Employee Classification and Types of Employment* for more information.

Payroll Percentages: The percentages listed on the effort card that are derived from the payroll data in the Banner financial system.

Personnel Action Form: The Personnel Action Form (PAF) is used to document appointments of university employees to sponsored and/or non-sponsored accounts for which employees are compensated. The PAF form is used to document estimates of effort and is not used as final documentation of effort charged or cost shared to sponsored projects.

Principal Investigator (PI): The individual whom the university designates to direct the scientific, technical, or programmatic aspects of a sponsored program, project, or activity. The PI is responsible and accountable to the university and the sponsor for the proper conduct of the project or activity. In addition to accepting the overall responsibility for directing the research or program activities, the PI also accepts responsibility for administrative/financial oversight of the award and for compliance with relevant university policies, federal regulations, and sponsor terms and conditions.

Project Director (PD): For the purpose of these policies, Project Director is a title synonymous with Principal Investigator for a non-research sponsored program.

Quarterly Period of Performance: The quarterly period that effort is documented based on 6 or 7 NSU pay periods. Each effort card corresponds to a particular quarterly period of performance.

Research Scientist: An NSU employee classification representing someone who is in charge of one or more research projects or serves as the PI of his/her own sponsored project and is thus, treated as a PI or Certifier for certification purposes.

Research Staff: This term is used to describe all employees, other than PIs/PDs, who have effort, whether paid or unpaid by the sponsor, for sponsored research and other scholarly activities such as instruction, training, and service. Researcher staff are involved in varying degrees with the development and execution of NSU's sponsored projects. In some instances, researcher staff may be faculty members and will certify their own effort.

Sponsored Project: A sponsored project, also referred to as a sponsored program, activity, account, or agreement, is an externally funded activity that has a defined scope of work or set of objectives and is governed by specific terms and conditions of the sponsoring organization. Sponsored projects must be separately budgeted and accounted for, subject to the terms of the sponsoring organization. Sponsored projects may include: grants, cooperative agreements, contracts, or purchase orders (referred to as awards) for research, community service, and training.

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RESPONSIBILITIES

Principal Investigators/Project Directors (PIs/PDs)

The PI/PD for each sponsored project bears the ultimate responsibility for the financial, administrative and programmatic aspects of that project. The PI/PD is ultimately responsible for identifying the correct sources of funding for each employee on his or her sponsored projects. However, it is generally recommended that non-certifying research staff performing the work should complete their effort card prior to certification by the PI/PD. The PI/PD is responsible for ensuring that:

- Each research staff charged to a sponsored project devoted the indicated proportion of his or her time and effort to the project(s),
- Effort devoted to sponsored projects is reasonable and commensurate with commitments to sponsors,
- Effort is certified in a timely and accurate manner,
- The certification activities are appropriate for the sponsored project(s),
- The work occurred during the indicated time period,
- Any transfers of salaries to/from the project(s) reflect the actual effort performed by the employee on that project, and that
- Any changes on effort commitments are communicated to the Office of Sponsored Programs before the change occurs.

Unless the researcher is a faculty member, the PI/PD is responsible for certifying a research staff's effort on his/her sponsored project(s). In rare situations where the PI/PD is not the person with suitable means of verification of effort for staff on the project, i.e., for a large Center grant where day-to-day operations have been delegated, the authority to certify effort may also be delegated with approval from the Dean and OSP.

Research Staff – Non-Faculty Members

Research staff are responsible for reviewing the quarterly effort certification card and verifying that all sponsored projects to which they are allocating effort are included, and that the percentages of effort expended on each project are correct. The research staff completes certification activities for each sponsored project and enters the actual percentages for the time he or she spent on all activities and saves the effort card.

Research Staff – Faculty Members

If the research staff member is a faculty member, he/she has the authority to certify his/her effort card, in addition to the responsibilities outlined above for non-faculty members. In doing so, he/she has the

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responsibility to ensure that the effort devoted to sponsored projects is reasonable and commensurate with commitments to sponsors, that effort is certified in a timely and accurate manner, that transfers of salaries to/from the project(s) reflect the actual effort performed, that certification activities are appropriate for the sponsored project, and that the work occurred during the indicated time period.

Effort Coordinator (EC)

ECs are designated for each college/center/department that participate in sponsored funding. The EC provides assistance to PIs/PDs, faculty, staff, and Deans as effort is certified and reviewed. The EC should have knowledge of all sponsored and non-sponsored activities and commitments within the college/center/department. He/she will monitor, review, verify, resolve discrepancies and ensure corrections are made to the effort cards for all personnel assigned to sponsored projects within his/her college/center/department. On occasion, the EC will also have these responsibilities for employees from another college/center/department when that employee is working on a sponsored project in the EC's college/center/department *and* the employee's college/center/department does not have sponsored funding. The EC may need to coordinate with other colleges/centers/departments when activities are outside of their college/center/department. The EC reviews the effort cards and is responsible to:

- Verify that the research staff and PIs/PDs have certified and the Dean or his/her designee has reviewed the effort of all personnel assigned to sponsored projects within the prescribed time frames,
- Verify that each PI/PD has certified for his/her sponsored projects, for research staff working on multiple sponsored projects with different PIs/PDs,
- Verify that the percentages of effort on the non-sponsored activities (other university commitments) of personnel are reasonable,
- Process salaried cost transfers to ensure that any significant changes (greater than 5%) for any assigned activity on the effort card is reflected in the Banner financial system (An example of a significant change: if the payroll percentage for a sponsored project is 5% and PI/PD certifies 7% effort, the percent change would be 40% $(((7-5)/5)*100)$), and
- Ensure that effort cards are fully processed within the certification period.

The EC notifies the Central Effort Administrator whenever their respective college/center/department repeatedly fails to meet the requirements of this policy.

Dean or His/Her Designee

The Dean of the college/center/department, or his/her designee, is responsible for ensuring that PIs/PDs, research staff, and ECs comply with this policy. He or she reviews the quarterly effort cards of all employees within the college/center, verifying that they have properly certified their effort cards. On occasion, the Dean, or designee, will also have these responsibilities for employees from another college/center/department when that employee is working on a sponsored project in the Dean's

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college/center/department *and* the employee's college/center/department does not have sponsored funding. The Dean, or designee, ensures that all employees charged or cost-shared to sponsored projects receive training and maintain up-to-date knowledge on the time and effort certification and reporting process. Once the Dean, or designee, has reviewed the effort cards, a record of his or her review is created in the ECRT system. He or she may initiate an enforcement action against college/center/department staff who fail to comply with this policy.

Central Effort Administrator (CEA)

The Central Effort Administrator (CEA) in the Office of Sponsored Programs (OSP) is responsible for the implementation of the effort reporting policy and procedures, particularly as it relates to the use of ECRT system. The CEA provides training to the Deans (or their designees), ECs, PIs/PDs, and research staff on the effort reporting policy and procedures and the use of the ECRT system. Also, the CEA verifies that quarterly effort cards are completed on time, and implements changes and improvements to the ECRT system. The CEA will interface with any internal or external auditors seeking information about this policy or the ECRT system. The CEA maintains a list of Deans and their designees and ECs and updates it as necessary. The CEA prepares the ECRT Quarterly Status Report as well as conducts the internal quarterly evaluation (per #8 below).

Office of Sponsored Programs (OSP)

The Office of Sponsored Programs (OSP), working with the PI/PD and their college/center/department and other applicable internal and external offices, is responsible for ensuring that personnel costs charged to sponsored projects meets sponsor requirements. The OSP is responsible for reviewing any notification by the PI/PD of changes to the effort of personnel for compliance with terms and conditions of the sponsored project. The ECRT system is administratively housed within the OSP, which is responsible for the overall management of the system.

Payroll Department/Contracts and Grants Accounting Department

The Payroll Department is responsible for managing Banner payroll records supporting all salaries and wages charged or cost shared to sponsored projects. Once notified of corrections to quarterly effort cards, the Payroll Department makes corresponding changes to the Banner financial system to reflect the accuracy of the salary rates and the percentages charged to sponsored accounts so that sponsored funds are allocated properly. The Contracts and Grants Accounting Department (CGA) ensures that labor charges invoiced under sponsored projects accurately reflect amounts reported on financial reports. For the detailed process, please refer to Financial Operations Accounting and Financial Policies and Procedures, Finance Policy No.110 *Payroll and Related Policies* and No.127 *Administration of Grant and Contracts*.

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Office of Human Resources (OHR)

The Office of Human Resources (OHR) is responsible for processing initial Personnel Action Forms (PAFs) for the appointment of employees and salary or wage allocations. OHR also processes PAFs for permanent changes in employee status, *e.g.*, salary changes, part-time status, etc.

Office of Information and Innovation Technology (OI²T)

The Office of Information and Innovation Technology (OI²T) is responsible for the biweekly data uploads from the Banner financial system and the OSP's PATS Database into the ECRT system. OI²T is also responsible for the technological maintenance and improvements to the ECRT system.

REFERENCES:

- OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200, <https://federalregister.gov/a/2013-30465>
- *Memoranda 01-06 – Clarification of OMB A-21 Treatment of Voluntary Uncommitted Cost Sharing and Tuition Remission Costs*, United States Office of Management & Budget (OMB)
- NSU Financial Operations Accounting and Financial Policies and Procedures, Finance Policy No. 110.11 - *Payroll Process Related to Effort Certification and Reporting Technology (ECRT) System for Sponsored Programs/Projects*, <http://www.nova.edu/fop/forms/policies.pdf>

EFFORT CERTIFICATION PROCEDURES:

1. **ECRT Pre-fills the Effort Cards:** During each quarterly period of performance, ECRT creates the effort cards via data loads by OI²T from the Banner financial system and the OSP's PATS Database. At the conclusion of the quarterly period of performance, ECRT sends an automatically generated email to ECs that the month-long administrative review period has begun and effort cards are ready for their review. At the start of the certification period, ECRT sends an automatically generated e-mail to all PIs and research staff that effort cards are ready for review and certification.
2. **Effort Certification/Completion by Research Staff:** Each research staff reviews the payroll percentages of effort displayed for each activity to which he or she is charged. The research staff make(s) sure activities performed during the quarterly period of performance are represented by completing the appropriate "Certification Activities" boxes and clicking the "Save" button. The research staff then enters in the "Certified Effort" field the percentage of his or her time expended on each listed activity during the quarterly period of performance.

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- a) If the percentages of time actually expended by the research staff match the payroll percentages, the research staff clicks the “Save” button, which then notifies the research staff that he or she has “only saved (not certified) activity information.”
- b) If the percentages of time actually expended by the research staff differ from the payroll percentages, then those percentages actually expended are entered into the “Certified Effort” field. If a change is made to one activity, a change in other activities will be required so total effort is 100%. The ECRT system and Banner financial system need to be corrected if there are reasonably significant changes of 5% or greater from those originally estimated for the assigned activities(s).
- c) For research staff who are faculty members, the process is the same as provided for research staff above with the exception that the faculty member check(s) the “Certify Checkboxes” and clicks the “Certify” button. The certification statement is then displayed and the faculty member electronically “signs” the following certification:

I certify the salary charged, salary transfers processed, and effort certified this period reasonably reflect the work performed in the designated period, and that I have sufficient technical knowledge and/or I am in a position that provides me with suitable means of verification that the work was performed.

The faculty member will be prompted to click “I agree” or “Cancel” to the above certification statement.

- d) In extenuating circumstances, research staff who are not faculty members may be granted the role/right to certify his/her own effort. Approval must be obtained from the CEA, the EC, and the PI/PD. The CEA will change the role/right in ECRT. For PIs/PDs and faculty certifiers that leave NSU or other limited and extenuating circumstances, the dean or direct supervisor may certify the effort card.
- 3. Effort Certification by the PI/PD:** The PI/PD certifies his/her own effort using the same process as provided above for researchers who are faculty members. In addition, the PI/PD must certify for all non-faculty research staff assigned to his or her sponsored projects. The PIs/PD’s Work List in ECRT lists all the research staff who were charged or cost-shared on the PIs/PDs sponsored projects during the quarterly period of performance. The PI/PD reviews the quarterly effort cards of each research staff on the list. The PI/PD may select up to five effort cards to certify at a time.
- a) If correct and ready for certification, the PI/PD checks the “Certify Checkboxes,” clicks the “Certify All” button and electronically “signs” the following certification statement:

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I certify the salary charged, salary transfers processed and effort certified this period reasonably reflect the work performed in the designated period, and that I have sufficient technical knowledge and/or I am in a position that provides me with suitable means of verification that the work was performed. Do you wish to certify all?

The PI/PD will be prompted to click “Ok” or “Cancel” to the above certification statement.

- b) The PI/PD may also choose to certify his/her staff individually using the same process as provided for research staff who are faculty members described above.
 - c) If the effort charged to an account represents a change of 5% or greater of the effort actually expended, the PI/PD should notify the EC. Such changes may require that the PI/PD enter an effort note to document how the cost transfer should be allocated over the individual pay periods that make up the quarterly period of performance, or other special circumstances.
- 4. Effort Review by the Dean or Designee:** The Dean reviews the effort cards of the PI/PD and research staff.
- a) If review is acceptable, the Dean clicks “Review Accepted” and the effort card proceeds to the EC for processing.
 - b) If review is unacceptable, the Dean clicks “Review Not Accepted” and the effort card is returned to the “not certified” status. The Dean consults with the PI/PD and EC to resolve outstanding issues so the effort card can complete the certification process
- 5. Corrections Processed by Effort Coordinator (EC):** The EC should have knowledge of the employee’s direct charges or cost-share to sponsored projects and other university assigned duties.
- a) The EC is responsible for processing any changes or corrections on the certified effort card by sending the External Audit Report to the Payroll Department/Contract and Grant Accounting Department via an email attachment to ecrtCTS@nova.edu by the close of the certification period. If the effort change is permanent, the EC or appropriate departmental contact will submit a revised PAF to OHR, with a copy to the CEA at OSP. OHR will then send the PAF to the Payroll Department. This should be completed before the next certification period.
 - b) Following reconciliation and confirmation from CGA, the Payroll Department enters corrections in the Banner financial system which are then reflected in the financial reports submitted to the sponsoring agency. The Payroll Department is responsible for entering the

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corrections in the Banner financial system within 30 days after the completion of certification period. Please refer to Finance Policy No. 110.11 - *Payroll Process Related to Effort Certification and Reporting Technology (ECRT) System for Sponsored Programs/Projects*

- c) If a temporary absence by the PI/PD, or other key personnel devoted to the project, will exceed a continuous period of three months, or reduce time devoted to the project by 25% or more, the PI/PD must contact the OSP before the change occurs so prior written approval from the sponsor can be obtained as appropriate (refer to OSP Policy No. 29 – *Personnel Changes*).
 - d) Any changes on effort commitments are communicated to the OSP before the change occurs.
 - e) The EC verifies through the ECRT “College/Center Dashboard” module and the “Reports” module in ECRT that these changes have been processed for all employees in his/her college/center/department.
- 6. ECRT Quarterly Status Report:** The ECRT Quarterly Status Report is prepared by the CEA and distributed by the Director of OSP 45 days after the close of the certification period to communicate the status of the certification process to the university community.
- 7. Recertification:** Recertification of effort involves adding effort to one or more sponsored projects after an initial certification of effort occurred to sponsored projects that will result in increased salary charges to a sponsored project. Recertification of effort questions the reliability of the initial attestation of effort, the certifier, and the effort reporting process, and is generally not allowed. Exceptions will be submitted to the CEA and reviewed and approved by the Vice President for Research and Technology Transfer on a case-by-case basis.
- 8. Internal Evaluation:** The CEA will review the ECRT system and effort reporting process on a quarterly basis and follow-up on any identified issues.