

203 Time and Effort Reporting Policy

Colorado Mesa University (CMU) is required to comply with the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) Circular. CMU requires that all individuals who receive federal funding comply with University policies and sponsoring agency regulations regarding the proposing, charging, and reporting of time and effort on those awards.

CMU faculty and staff are expected to charge their time to sponsored projects commensurate with the committed effort expended on all activities they perform. The Uniform Guidance Subpart E §200.430 contains the federal regulatory requirements for internal controls over certifying time and effort expended on sponsored projects. CMU's effort reporting practice involves an after the fact system to certify that salaries charged or salaries cost shared to sponsored projects are reasonable and consistent with the work performed.

The process for effort reporting begins with Principal Investigators (PI) and/or Project Directors (PD) meeting with the sponsored programs staff to prepare contract preps or salary change forms in order to assign individual effort in the payroll system based on anticipated activities in order to encumber and eventually charge payroll to specific awards. Actual effort expended on each project is then certified on the Time & Effort Report by the individual whose salary was paid on a federal award or whose salary is part of a cost share commitment to a federal award. In addition, the Time & Effort Report is also reviewed and certified by a responsible person with suitable means of verification (normally the PI/PD) that the work was performed at the end of a specific reporting period. The effort certification should be a reasonable estimate of how time was expended. The Uniform Guidance Subpart E §200.430 specifically states *“It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to federal awards for IHEs (Institutions of Higher Education), a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected.”*

The semi-annual Sponsored Programs Time & Effort Report Form is the primary means for complying with federal effort certification regulations. Time & Effort Reports are generated by the Office of Sponsored Programs for the period January 1 – June 30 and July 1 – December 31. Sponsored Programs and/or the University may require effort certification for periods other than the standard period as the need arises (for example, to comply with funder expectations or to properly and timely close-out a federal award).

PIs, PDs, faculty, and staff whose salary is paid on a federal award or whose salary is part of a cost share commitment on a federal award, are required to review and complete a Time & Effort Report Form. PIs, PDs, faculty, and staff must review and determine whether the percentages reasonably reflect the committed effort expended and the work performed on each sponsored project and the aggregate effort associated with “all other activities” displayed on the report form. *Variations up to 5% of total salary, for each award listed, are allowable and do not require an adjustment or recertification. Variations over 5% for each award should be corrected prior to the final report form signature/certification. Variations over 5% will result in a cost reallocation/transfer within the payroll/accounting system.*

Faculty and staff payroll is based on anticipated effort and salary distribution and is certified after the fact. However, effort certification applies to all individuals paid on federal awards, including student workers. Student workers are paid through the university's student payroll system which is based on actual time and effort worked. Student payroll is processed after the fact for the hours they have worked. Student effort certification takes place through the university's student payroll electronic time sheet approval system which requires the student to assign hours and days (effort) worked to specific

CMU accounts. The student's supervisor (PI/PD) must then electronically approve (certify) the hours and days (effort) worked by the student on each specific CMU account in order for the student to be paid. The student electronic time sheet takes the place of the Sponsored Programs generated Time & Effort Report Form.