

Policy on Time and Effort Reporting for Federally Funded Research Awards at Illinois Wesleyan University

The federal government requires effort certification on federally-sponsored research activity. In order to receive and maintain eligibility for funding, sponsoring agencies require accurate and reasonable documentation to support that labor costs charged to sponsored accounting units are consistent with the effort expended. This certification is reviewed to verify that the percentage of effort placed on a federal award is not less than the percentage of salary charged to the accounting unit. This Effort Policy is intended to meet this federal requirement.

Illinois Wesleyan University uses an “after-the-fact effort reporting” system to comply with the federal effort certification requirement. Under this system, the distribution of salaries for employees working on federally funded projects will be supported by Time and Effort Reports.

Salary charges to grants are made initially on the basis of estimates made before the services are performed. Time and Effort Reports will reflect the percentage distribution of salaries of employees. If significant (>5%) differences between the estimated charges and actual distribution of effort exist, the charges will be promptly adjusted to reflect actual effort.

POLICY STATEMENT:

Time and Effort Reports will reflect the percentage distribution of effort by IWU faculty, professional staff and students charged to federally funded projects. Each PI/PD is responsible for confirming, by their signature on the Time and Effort Report, the percentages of effort allocated to federally funded projects.

Effort is not determined based on a 40 hour week, but rather on total hours worked. It is based on 100% of activities for which employees are being compensated, including sponsored and non-sponsored activities, for a given time period. Effort is expressed as a percentage of total compensation. Effort reported on reporting form must total 100%.

Time and Effort Reports do not need to be completed by clerical staff or students who fill out a bi-weekly time sheet.

To confirm that distribution of activity represents a reasonable estimate of the work performed by the employee during the period, the record for each employee must include the signature of the PI/PD or of a person having direct knowledge of the work, confirming that the record of activities allocable as direct costs of the award is appropriate.

Time and Effort Reports are required, at a minimum, annually. If more frequent reporting is necessary, this will be determined by the PI/PD in collaboration with the Grants and Foundations Office. They will be distributed to all applicable PI/PD's approximately 15 days from the close of a reporting period. Completed reports must be submitted to the Faculty Grants Manager no later than 30 days after the

distribution of the Time and Effort Reports. Completed Time and Effort Reports will be filed in the GFR Office.

PROCEDURE

All individuals required to complete time and effort reports will maintain a record of their grant-related activities (time on task) in a shared spreadsheet maintained by the PI/PD and shared with the Grants and Foundation Relations Office/the Associate Dean for Scholarly and Creative Work, depending on the award.

Annually, at a minimum, the Grants and Foundations Relations Office/Associate Dean for Scholarly and Creative Work will request a completed time and effort reporting sheet from all relevant individuals. The request will be communicated to the PI/PD who will coordinate the collection of all reports from their team. The PI/PD will submit reports to the Grants and Foundations Relations Office/Associate Dean for Scholarly and Creative Work for verification.

Upon verification of time and effort, compensation will be requested via a non-invoice payment request sent to the Business Office with a copy of the time and effort report. Payment will not be released without appropriate documentation and reporting.

ITEMS OF NOTE

1. When a PI/PD is absent in excess of 90 days from his/her project, pre-approval must be obtained from the sponsoring agency.
2. When a PI/PD reduces his/her effort by 25% or more in a grant year, pre-approval must be obtained from the sponsoring agency.
3. Under federal regulations on effort reporting, 100% effort is an employee's total hours actually spent on work within the scope of his or her employment regardless of how many or how few hours an employee works and regardless of the percent FTE listed on the appointment.
4. Effort certification must reflect actual work performed.
5. Just as an employee's total effort is not defined by regular business hours of the employer or by the percent FTE of the appointment, research effort does not necessarily take place only in the research facility/lab or only on university premises. Research effort can occur at home, at a conference or in off-site research-related meetings, etc. If these types of hours are included in calculating research effort, they must also be included in the calculation of total effort.
6. PI/PD's should maintain documentation that supports research contributions - in research content and in time/percentage of effort (calendars, correspondence, work products, etc.).
7. A request for reclassification or adjustment to time and effort reporting can be processed with a Letter of Justification (LOJ) from the PI/PD that clearly sets forth why previous effort was erroneously certified, and why the requested change is more appropriate within the context of law, federal requirements, or IWU policies and procedures.
8. In preparing the letter of justification, please include the following information:
 - a. Name of faculty/employee/student
 - b. Effort reporting period
 - c. Grant number(s) affected by the change
 - d. Statement of justification explaining the following:
 1. The appropriateness of the charge to the Grant

2. How the work being performed benefited the grant being charged
 3. A brief description of the duties performed on the project
 4. Explanation of how the error occurred and how it was discovered
 5. Signature of Principal Investigator (PI) or Project Director (PD) and date.
9. LOJs are submitted to the GFR Office who will submit to the Provost/Dean of Faculty. Retroactive adjustments requested via a LOJ must occur within 90 days of recording the expenditure for which a reclassification is requested, as federal requirements generally allow up to 90 days after the project period end date for final reporting. Final effort reporting and any retroactive adjustments must be completed before the final reporting deadline for the award.