## University Policy Number 1000.3:
## Time and Effort Reporting

**Responsible Administrator:** Associate Vice Provost of Sponsored Programs and Research
**Responsible Office**: Sponsored Programs and Research Office
**Originally Issued**: March 2025
**Authority**: Office of the President

## Policy Statement
Claflin University's policy is to ensure compliance with federal guidelines regarding Time and Effort.

## Statement of Purpose
Claflin University is committed to ensuring that all faculty, staff, and researchers comply with federal, state, and institutional regulations regarding allocating and certifying time and effort. This policy establishes guidelines for accurately reporting time and effort spent on externally funded sponsored projects to ensure compliance with OMB Uniform Guidance (2 CFR §200.430), NSF, NIH, and other federal agencies.

The purpose of this policy is to:

1. Ensure compliance with federal requirements for tracking and certifying effort on sponsored projects.
2. Prevent cost disallowances by providing a structured and auditable system for effort reporting.
3. Ensure accurate allocation of salaries and wages to sponsored programs.
4. Maintain transparency and accountability in financial reporting.

## Applicability
This policy applies to all personnel who receive compensation from federal and non-federal sponsored projects, including:

- Faculty members who conduct research under sponsored awards.
- Principal Investigators (PIs) and Co-Principal Investigators (Co-PIs).
- Postdoctoral researchers and research staff.
- Graduate and undergraduate students receiving salary support from grants.
- Administrative and clerical staff whose salaries are charged to sponsored projects (when allowable).

## Federal Regulatory Requirements

OMB Uniform Guidance (2 CFR Part 200.430) – Compensation and Effort Reporting

Federal guidelines require that institutions receiving federal funds:

1. Maintain a system of internal controls to ensure that salaries and wages charged to federal grants are reasonable, allocable, and accurately documented.
2. Provide periodic certification of effort by an individual with firsthand knowledge of the work performed.
3. Ensure that effort reporting reflects total institutional effort (100%) and is consistent with activities performed.
4. Maintain records and supporting documentation for audit purposes for at least three (3) years after project closeout.

## National Science Foundation (NSF) Requirements

NSF requires institutions to:

- Ensure that salary charges and committed effort are aligned.
- Limit senior personnel salaries to two months per year unless explicitly approved in the budget.

## National Institutes of Health (NIH) Requirements

NIH requires institutions to:

- Charge a portion of their salary to grants but requires prior approval for salary increases beyond the committed effort.
- Comply with the Public Health Service (PHS) Financial Conflict of Interest (FCOI) policy when time and effort involves NIH-funded projects.

## Effort Reporting Policy

1. Definition of Effort

Effort refers to the proportion of time spent on a specific activity, expressed as a percentage of an individual's total institutional effort (TIE).

- 100% effort represents the total professional activities for which an individual is compensated by Claflin University, including:
    - Sponsored research and externally funded projects
    - Instruction and teaching
    - Administrative duties and service to the university

- o Public service and outreach

## Effort Commitment and Certification

All faculty, staff, and researchers must accurately track and certify their efforts on sponsored projects. The effort must be:

- o Reasonable and Reflects Actual Work Performed
- o Certified by an Individual with Firsthand Knowledge
- o Reviewed and Approved by the Principal Investigator (PI)
- o If the employee is paid through timecards or other forms

## Effort Certification Periods

Effort reports must be completed and certified:

- Quarterly for faculty and staff on sponsored projects.
- Monthly for graduate students and postdoctoral researchers on federal grants.

## Effort Reporting Process

Step 1: Pre-Award and Proposal Stage

- Effort commitments must be included in grant proposals and budgets.
- Faculty must ensure their proposed effort does not exceed 100% institutional effort.

Step 2: Salary Allocation and Payroll Distribution

- Salary charges must be allocated to sponsored projects based on effort commitment.
- Payroll charges must be reviewed for accuracy and consistency with effort commitments.

Step 3: Effort Certification and Verification

- Effort reports are generated by the Sponsored Programs and Research (SPAR) Office.
- Individuals must certify their effort via Claflin University's electronic or manual reporting system.
- Principal Investigators (PIs) must review and approve effort reports for their research teams.

Step 4: Audit and Record Retention

- Effort reports and supporting documentation must be retained for three (3) years after project closeout.
- The Sponsored Programs and Research (SPAR) Office and Fiscal Affairs will conduct periodic internal audits.

## Cost Sharing and Voluntary Effort

1. Mandatory Cost Sharing

- If an award requires cost sharing, committed effort must be tracked and reported.

2. Voluntary Uncommitted Effort

- Voluntary uncommitted effort (additional time devoted to a project beyond the committed amount) must not be tracked in effort reports but must not be charged to a grant.

3. Overcommitment of Effort

- Faculty and staff cannot commit more effort than what is reasonable given their total institutional workload.

## Consequences of Non-Compliance

Non-compliance with this policy may result in:

- Disallowed costs and grant reimbursements required by federal agencies.
- Loss of funding eligibility for future sponsored projects.
- Disciplinary action per Claflin University's policies.

The Sponsored Programs and Research (SPAR) Office and Fiscal Affairs will conduct effort compliance reviews to prevent audit risks.

## Roles and Responsibilities

- Principal Investigators (PIs)- Ensure effort is allocated correctly, certified, and documented.
- Faculty and Research Staff- Accurately report and certify actual effort expended.
- Sponsored Programs and Research Office - Oversees compliance, audits, and training on effort reporting.

## Training and Compliance Monitoring

- Mandatory RCR (Responsible Conduct of Research) training for all researchers on federal grants.

- Annual workshops on effort certification and grant compliance.

Monitoring and Internal Audits

- The Sponsored Programs and Research (SPAR) Office will conduct periodic random audits.
- Payroll distributions will be reconciled with effort reports to ensure accuracy.

## Policy Review and Updates

This policy will be reviewed annually by the Sponsored Programs and Research (SPAR) Office and Fiscal Affairs to ensure continued compliance with federal regulations and university guidelines.