Sponsored Projects Effort Reporting

UNIVERSITY POLICY #237

Authority:
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SECTION 1: Statement

1.1 To establish guidelines for charging effort to sponsored projects (e.g. grants) and documenting effort charged. This policy relates to any faculty or staff who devote effort to one or more sponsored projects, whether federally funded or funded by another source.

SECTION 2: Definitions

2.1 **Institutional Base Salary (IBS)**. Annual compensation paid by the University for an employee's appointment during the contracted time period; it includes activities such as teaching, service, professional activity and stipends for additional duties that require a ten-month appointment. IBS does not include other stipends received for additional overload teaching. IBS may not be increased as a result of replacing or supplementing University salary with funds from a sponsored project.

2.2 **Extra Service Pay (ESP)**. Payment for services performed above and beyond the employee's appointment and IBS. Extra Service Pay charged to a sponsored project must be appropriately documented, including an explanation of how the ESP compensates activities above and beyond the activity specified in the individual's appointment letter, and approved by the Provost or designee.

2.3 **Summer Salary**. Faculty may perform work on sponsored projects during the time period that is not included in their regular faculty contract and receive compensation in addition to their IBS. The rate of pay must be commensurate with their IBS and cannot exceed 3/9th for nine-month appointments or 2/10th for tenmonth appointments of their annual IBS salary.

2.4 **Effort**. The proportion of time spent on any activity which falls under their IBS, expressed as a percentage of the total duties for which an individual is employed by West Liberty University and receives IBS (some sponsors, such as the NSF and NIH, require that effort on grant proposals be expressed in person-months, but the concept is the same). Total University Effort is defined in terms of actual effort and is not defined on the basis of a standard number of hours in a week, month, or year. (ex: if an employee works an 80-hour work week, then 40 hours represents 50% effort) The total University effort cannot be greater or less than 100%.

SECTION 3: Provisions

3.1 **Charging Effort to Sponsored Projects.**

3.1.1 Federal regulations require charges to federal awards for salaries and wages to be reasonable in relation to the work performed, they must also be accurate, allowable, and properly allocated. These charges must be documented in University records.

3.1.2 When charging effort to a sponsored project, the rate must be based on the IBS rate, which is calculated based on the number of months in the individual's appointment. (ex: if a faculty on a nine-month contract devotes one month of effort to a project, then one-ninth of their IBS can be charged). The same applies to both direct charges and to cost share commitments.

3.1.3 Charges can be made up to the proportionate amount of IBS for the effort expended on a project (in accordance with the project budget), but the full amount does not have to be charged to the project. The PI may opt to do voluntary cost sharing for a portion, or all, of their effort on the project.

3.1.4 Direct charges and cost share commitments must be supported by Effort Reports, which certify the effort reported is within 5% of the effort expended.

3.2 **Effort Certification**

3.2.1 Effort certification is a means of verifying after-the-fact that the salary charged to a project is reasonable in relation to the effort expended on the project. The process of certifying the effort report also allows the individual to assess whether the effort expended on a project is consistent with the effort required by the sponsor or committed by the PI.

3.2.2 The effort report summarizes the proportion of work time devoted to each of an individual's activities, expressed as a percentage of Total University Effort. The effort report should include all activities, including any administrative or other responsibilities of the individual conducted under the terms of an individual's employment and for which they receive IBS, ESP or Summer Salary. The effort report should reflect an appropriate distribution of non-sponsored salary to non-sponsored activities such as teaching, committee work, preparation of grant proposals and other such activities. Federal regulations recognize that in an academic setting, teaching, research, service, and administration are often inextricably intermingled and so a precise assessment of factors that contribute

to costs is not always feasible; charges are expected to be reasonable but not precise.

3.2.3 Effort reports will be completed and signed annually, with additional reports throughout the year on an as-needed basis at the discretion of the grant administrators in accordance with procedures developed for this purpose. The effort reports must be signed by either the individual themselves, or if the individual is unable to sign, by an official who has a reasonable basis to review the activities of the individual. A reasonable basis means that the person certifying has a suitable means of verification of the effort being certified, such as direct supervisory responsibility, discussion with the employee, email correspondence, etc.