I. Purpose:

To establish procedures to be followed for issuing, receiving, and certifying Effort Reports for personnel charged to federally-funded sponsored projects.

II. Policy

As a recipient of federal funding, Radford University is responsible for maintaining an effort reporting system in compliance with OMB Circular A-21, Section J-10, and 2 CFR Part 220 for awards issued to the university after December 26, 2014. The University fulfills this requirement through the use of paper generated Effort Certifications generated by the Office of Sponsored Programs and Grants Management. This certification includes effort for reassigned time, cost-shared time, and other personnel time directly charged to a federal project. The level of effort for faculty and staff is reported based on a reasonable percentage, as required by federal regulations, and must be certified by the employee, Principal Investigator, or responsible official using suitable means of verification that the work was performed. The percentage of effort reported on all activities must total, but cannot exceed, 100 percent.

Wage employees paid on federal grants or contracts, who sign timecards, are not required to complete an Effort Certification, but the timecards shall meet the requirements as stated in OMB Circular A-21 Section 10, or 2 CFR Part 220. Personnel receiving “incidental” or overload pay for grants will not complete or submit an Effort Certification since federal regulations do not require incidental effort be reported provided the work and pay are separately identified and documented in the University’s financial system.

III. Procedures

SPGM Post Award is responsible for the administration of a block of sponsored projects. When a fully signed payroll form (PR40) to employ personnel on a federal funded grant is received by Post Award, he/she will decide if an Effort Certification is required, and if required, he/she will enter the PR40 information in the SPGM Effort Reporting Database. Cost Share effort and reassigned time information is also inputted in the database.

Information entered in the database includes: employee classification, level of effort, the period of employment on the grant, and the grant accounting number. Percentages of reassigned time and cost sharing information are also entered at the same time.
Effort certifications are generated by Post Award each semester for faculty per the following schedule:

- **Fall:** August 10th through December 24th
- **Spring:** December 25th through June 9th
- **Summer:** June 10th through August 9th

All classified staff and non-faculty, one-time pays, charged to a federal grant will certify effort on a monthly basis.

Effort reports will be mailed by the Post Award Administrator to the Principal Investigator for signature. Effort reports are due no later than 60 days after the reporting period. After certifications are returned to Sponsored Programs and Grants Management, Post Award enters the return date in the database and files the documentation in the appropriate project file. These certifications will be maintained along with other grant materials for audit purposes.

If the Principal Investigator does not return the signed effort certification by the specified due date, the assigned Post Award Administrator will send the PI an email reminder. If the certifications are not returned within 10 business days after the email reminder, all related grant activities will be suspended by the Director of Sponsored Programs and Grants Management until the situation is resolved.

### IV. Definitions

None

### V. References

OMB Circular A-21, Section J10, “Cost Principles for Educational Institutions” and 2 CFR 200, “Uniform Administrative Requirements, Cost Principals, and Audit Requirements for Federal Awards”

### VI. Approvals and Revisions

This policy was reviewed and approved by the Director of Sponsored Programs and Grants Management and Vice President for Planning and Research on June 30, 2006.

This policy was revised by the Director of Sponsored Programs and Grants Management on October 1, 2012 to reflect current position titles and to bring process changes current.

This policy was revised by the Director of Sponsored Programs and Grants Management for minor wording changes on July 10, 2017.