

Comprehensive Effort Reporting Policy

June 2013

RARA



Comprehensive Effort Reporting Policy

- Effective September 2013
- Logical sequence (sections A through G) and 14 examples
- Consolidates current UR guidance and policies
- Formalizes requirements not previously written
- Introduces new expectations and requirements
 - Close compliance “loop holes”
 - Enhance internal controls
- Introduction of Comprehensive Policy
 - ORPA distribution list
 - 90-minute education sessions (July, August, September) mandatory for administrators, with invitation to faculty



Contents

- A. Total University Effort
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- F. Cost Share Effort
- G. Annual Plan Confirmation System Review



Total University Effort (TUE)

What's In

Teaching/instruction

Externally sponsored and university sponsored
research

Public service

Clinical activities performed in UR owned facilities,
leased properties or affiliated enterprises

Administration

Professional development

Proposal development

Institutional service (e.g., serving on University
committees)



Total University (TUE)

What's Out

Clinical activity performed at non-affiliated institutions for which the work is not paid for by, or through, the University

Veterans Administration activities

Service on government agency study section or peer review panels

Advisory activities for sponsors

Peer review of manuscripts

Leaves of absences



Total University Effort (TUE)

What's Out (continued)

Leadership in professional societies

Volunteer community or public service

Lectures or presentations paid other than by the
University

External consulting



Proposing Effort

General Principles

The amount of salary support requested should normally be determined by multiplying the proposed level of effort by the individual's institutional base salary.



Proposing Effort

Minimum Effort

Faculty are expected to propose some level of activity (1% or more) on proposals where they are listed as PI or key personnel, unless specifically exempted by the sponsor or the award type (e.g. equipment award).



Proposing Effort

Budget Reductions

The PI is responsible to determine whether (1) effort commitments will need to be reduced proportionately and request ORPA to obtain sponsor approval; (2) original commitments will be retained and other budgeted items foregone; or (3) neither effort commitments nor other budget categories can be reduced (thus cost sharing?).



Proposing Effort

Visiting Faculty Appointments

- Sometimes paid by the individual's home institution and sometimes by the University of Rochester
- It is possible to commit effort of visiting faculty members on a sponsored project.



Proposing Effort

Visiting Faculty Appointments (cont.)

- If the visiting faculty member is paid by their home institution, such situation is to be fully disclosed in the respective proposal.
- At the end of each project year, the visiting faculty member is required to certify the effort spent on the project, as disclosed in the related progress report.



Establishment of Salary Support

Academic Leave of Absence

- An allocation of each month's compensation paid during the ALA shall be made to each sponsored project in proportion to the amount of time spent on such project during the ALA.
- The residual portion of the month's compensation is paid from the University's ALA account.



Establishment of Salary Support

Academic Leave of Absence (cont.)

- In cases where actual effort is paid from the ALA account, it is not appropriate to refer to that effort as cost share effort.
- The federal government pays for ALA costs through application of the annual fringe benefit rate to faculty effort/payroll allocations to sponsored projects.



Establishment of Salary Support

Extra Compensation

- Payment for extra compensation from sponsored accounts must be pre-approved by ORPA.
- Justification is required regarding how the activity being compensated is outside of the person's TUE.
- The extra compensation must be calculated using the person's current institutional base salary and the amount of time associated with the respective activity.



Management of Effort Commitments

General Principles

When To Update Payroll Distributions

- At a minimum, if an effort change is at least 10% of the individual's total effort or results in a reduction of documented effort on a single project (over a six month period) of 25% or more of the original commitment for the current project period.
- See Example on Handout



Management of Effort Commitments

General Principles

When To Update Payroll Distributions

- Departments and divisions must have an internal control system in place that effectively monitors the effort/payroll allocations.
- The objectives are to ensure effort/payroll allocations to sponsored projects are reasonable in relation to the work performed and that individuals are not overcommitted.
- See Policy's Appendix (Handout)



Certification of Effort

Who Can Certify

- Each individual should certify their own effort, unless extenuating circumstances prevent this from being achieved.
- Typically the principal investigator will have firsthand knowledge of the effort of most of the individuals working exclusively on their research projects.
- In extenuating circumstances when neither the individual nor the principal investigator are available to certify effort, administrators may certify the effort by obtaining suitable means of verification of such individual's effort.



Certification of Effort

General Principles

- A Pay Check Override does not result in a PAF with an effort certification statement.
- The Pay Check Override feature is not permitted since it breaks the sequence of effort certification for that individual.
- Exception - a single pay period when a PAF has been completed timely, but the PAF will not be processed by the Payroll Department for the first pay period within the effective date of the PAF



Certification of Effort

Individuals Who Leave the University

- If an individual leaves the UR, the administrator must process a termination Personnel Action Form (PAF) and have the individual certify the final effective effort/payroll allocation.
- The effective date of the form is the date of termination.
- If the individual leaves before certifying...the Chair or someone with sufficient knowledge of the work performed may sign.



Certification of Effort

Project Close Out

- At close out of a project, HRMS Form 800 should not be used to retroactively change effort/payroll allocations from a sponsored account that is in deficit, if the underlying effort was truly expended on the project.
- Rather, the value of effort in excess of the project's budget is to be a component of the journal entry that transfers the final deficit to an unrestricted account.



Certification of Effort

Annual “No Change” PAF for Selected Employees

- Run a report of employees without an effort/payroll allocation change in the prior 12 months
- For the employees on the report with at least one sub-ledger 5 account in the allocation, have them certify a “no change” PAF



Questions?

Comments?

