

Florida Institute of Technology Effort Reporting Procedures

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1. Background

1.1. Definitions

Effort – The effort devoted to a particular activity is expressed as a percentage of the total effort spent by the faculty member on all activities. Effort may be associated with teaching, funded research or/and research not funded, along with service. It may also be associated with administrative duties (e.g., department head).

The Effort Reporting form (Appendix A) records the percentages of effort for activities. The form is to be completed each semester by a faculty member working on a Sponsored Program (grant or contract). The Effort Reporting form is a certification by the faculty member and his or her unit supervisor (e.g., department head) of effort allocated to each activity.

The effort reported on the form INCLUDES:

- Funded research for each Sponsored Program.
- Research not funded by a Sponsored Program.
- Teaching to include course load and teaching-related duties.
- Service to include university, department or college, and/or external activities.
- Administration (e.g., department head).
- Sabbatical or leave of absence.

The effort reported on the form EXCLUDES:

- Activities supported by compensation from the US Department of Veterans Affairs.
- Volunteer community or public service not related to University effort.
- Unpaid absences.
- Activities (such as Florida Tech Consulting) for which the individual receives additional compensation beyond his or her salary identified in the annual appointment letter. (This is defined as the faculty's Institutional Base Salary in Section 1.2).
- Other special activities or awards resulting in payment of a lump sum or extra compensation from Florida Tech beyond the faculty's IBS.

Funded Research Effort – This is the percentage of effort that has been specified in a grant proposal to conduct research. Note that a faculty's effort can be considered funded by the Sponsored Program without having faculty salary specifically budgeted as part of the award.

For example, a faculty has been awarded a federal grant for which she specified in the proposal an allocation of 5% of her effort to completing the project. The budget did not include coverage specifically for her salary associated with the effort. It is still considered "Funded Research Effort", and is recorded as such on the Effort Reporting form. The faculty's salary, as identified in the annual appointment letter for research activities, provides coverage.

Total – An individual's total effort for all activities associated with research, teaching, and service, must equal 100% – never more or less – regardless of the number of hours worked or the appointment percent (full or part-time).

An individual with a part-time appointment calculates total effort as 100% percent of effort associated with his or her appointment.

Cost Sharing – This is the portion of total costs of a Sponsored Program (grant or contract) covered by Florida Tech and not covered by the Sponsor in the budget allocation of the award.

• **Mandatory Cost Sharing** - Mandatory cost sharing is required by statute or as condition of a specific solicitation or Sponsored Program announcement. It will normally appear in the award document from the federal agency. Mandatory cost sharing expenditures will be reported back to the sponsoring agency by Florida Tech in a Financial Report.



• Voluntary Committed Cost Sharing - Voluntary committed cost sharing is created if a proposal for a Sponsored Program includes cost sharing where none was required in the solicitation. Once funded, the PI and Florida Tech are "committed" to providing the project with the indicated effort support. Voluntary committed cost sharing expenditures are typically not reported back by Florida Tech to the sponsoring agency. It is still required; however, that the effort is reported on the faculty's Effort Reporting form given it is subject to audit.

For example, a faculty has been awarded a federal grant for which he specified in the proposal an allocation of 10% of his effort as a salary match (Voluntary Committed Cost Sharing) to a budgeted 10% of his salary charged to the grant. The total percentage of effort recorded on the faculty's Effort Reporting form is 20%. The faculty's salary, as identified in the annual appointment letter for research activities, provides coverage.

• Voluntary Uncommitted Cost Sharing - Voluntary uncommitted cost sharing represents effort to a Sponsored Program made after the award is received. For example, the PI or co-PI may decide to spend more effort on the project (e.g., 20%) than listed in the proposal (10%). This increase in effort is not charged to the Sponsor. However, the 20% allocation of effort is recorded as such on the faculty member's Effort Reporting form.

1.2. Institutional Base Salary

Institutional Base Salary (IBS), documented in a faculty's annual appointment letter, is the compensation for effort spent on research, teaching, service, or other activities. Effort activities excluded from the IBS are noted in 1.1.2.2.

A Sponsored Program may be charged a portion of the IBS attributed to actual effort expended on the funded project. Any charges to a Sponsored Program will have been approved by the funding agency and documented in the award. The faculty member documents this allocation as a percentage on the Effort Reporting form.

Institutional Base Salary in regards to funded research:

- May not be increased solely as a result of replacing Florida Tech salary funds with Sponsored Programs funds;
- Is established in the employee's appointment letter (new or annual).
- May be adjusted if:
 - The employee's formal appointment, and required professional effort, is changed from full-time to part-time, from part-time to full-time, or from one required level of part-time effort to another required level of part-time effort (e.g., 50% to 75%).
 - The employee receives a temporary or permanent increase or decrease in salary;
 - The employee receives a salary adjustment as part of a University-wide adjustment of salaries that occurs during a fiscal year; or
 - The employee receives compensation for additional duties (e.g., department head) even if such salary covers only temporary increases in assigned duties.

Summer salary is calculated based on the IBS of the preceding academic year and can only be charged to a Sponsored Program in proportion to the effort expended on the particular project during the specified time period.

1.3. Establishing a Distribution of Effort

Faculty must be able to account for each of the percentages of effort listed on the Effort Reporting form. Effort reporting should be reasonable estimates of activities, recognizing that research, teaching, and service are often inextricably intertwined.



The percentage calculation for activities not directly associated with funded research may be based on departmental or college-level guidelines that have been put in place. The faculty member should consult his or her unit supervisor regarding effort allocation for teaching and service activities.

1.4. Florida Tech or Other External Consulting

Florida Tech faculty and staff may engage in consulting activities for entities outside the University (e.g., Florida Tech Consulting; guest lecturer). These activities are not considered part of the faculty's IBS. Effort expended on such consulting is NOT to be considered in calculating percentages on the Effort Reporting form.

2. Proposing Effort

Some Sponsors require that effort be proposed in terms of person months (e.g., 3 person months of a 12 month appointment). Other Sponsors require effort to be expressed as a percentage. In either case, the salary support specified in a grant proposal should be determined by multiplying the percentage of effort by the individual's IBS.

For example, a faculty's IBS is \$80,000 as specified in her annual appointment letter. She is to charge 10% of her research effort to a federal award over a nine-month period. The salary charge to the Sponsored Program is 10% * \$80,000 = \$8,000. The percentage documented on the faculty's Effort Reporting form for each of fall and spring semesters is 10%.

Grant proposal requests for greater than 50% effort on a single project may need careful consideration with the exception of career development awards that commonly require a 50-75% commitment from the Principal Investigator.

In no event should the salary support exceed the amount determined by multiplying the proposed level of effort by the individual's IBS.

2.1. Required Effort Contributions from Principal Investigators (PI)

The PI is required to commit a portion of effort on a Sponsored Program given the responsibility for scientific, administrative and financial management of the project. The PI must record a minimum commitment of effort (1-2%) for each Sponsored Program on his or her Effort Reporting form.

No effort commitment is required for equipment and instrumentation grants, doctoral dissertation grants, or student augmentation grants. No committed effort is required from faculty mentors on institutional or individual training grants, since the faculty mentor's effort will be assigned to the specific research projects on which the trainees are involved. However, an effort commitment is expected for the named research training program director, since he/she will be expending effort in coordinating the training program.

2.2. Sponsor Salary Limitations

Certain Sponsors impose a limit or a "cap" on the annual rate of salary reimbursement (NIH awards and different caps on NIH Career – K awards). Investigators with IBS over the imposed limit for salary reimbursement from a Sponsor will need to adhere to the salary cap. The difference between the salary associated with effort and the salary limit is considered voluntary committed cost sharing. Note that this amount cannot be used for meeting mandatory cost share commitments. Salary in excess of the cap must be provided by Florida Tech from a source other than a federal-Sponsored Program. The PI and other key personnel should still devote the amount of effort agreed upon irrespective of a Sponsor imposed salary cap.

The faculty's Effort Reporting form identifies the percentage allocation for effort associated with the project regardless as to whether a salary cap is enforced.



3. Expending Effort and Charging Salary to Sponsored Programs

Each employee is responsible to ensure the accuracy of his/her level of research effort, as reported on the Effort Reporting form. If there are significant changes in the level of committed effort, these are to be communicated to both the unit supervisor (e.g., department head or dean) and the Director of Contracts in the Office of Research.

An employee's salary charge to a Sponsored Program must be the same rate at which Florida Tech charges salary for the individual's other activities. Salary distribution associated with effort for a Sponsored Program should be concurrent with actual effort put forth by the employee.

3.1. Activities That Can and Cannot be Allocated to Federal Sponsored Programs

According to 2 CFR 200.430 "Compensation-Personal Activities," the following are allowable to be direct charged to a Sponsored Program: "reasonable amounts for activities contributing and directly related to work under an agreement, such as delivering special lectures about specific aspects of the ongoing activity, writing reports and articles, developing and maintaining protocols (human, animals, etc.), managing substances/chemicals, managing and securing project-specific data, coordinating research subjects, participating n appropriate seminars, consulting with colleagues and graduate students, and attending meetings and conferences."

Examples of activities that can be allocated to federal Sponsored Programs include:

- Writing a progress report for the project, sometimes called a continuation proposal.
- Holding a meeting with lab staff to discuss the specific research project.
- Consulting with colleagues about specific aspects of the project.
- Delivering special lectures about specific aspects of the ongoing activity.
- Attending a scientific conference held by an outside professional society to disseminate research results from the project being direct charged.
- Mentoring graduate students on the specific research project.
- Making an invention disclosure and other activities related to pursuing intellectual property. Where more than one award or activity contributed to the development of the intellectual property, the effort distribution should be based on proportionate support provided under the awards or other equitable relationship. Activities related to the protection of intellectual property that may be allocable include reasonable levels during the award period for:
 - o making an invention disclosure
 - o meeting with the Office of Research IP Specialist to discuss an invention disclosure
 - meeting with a patent attorney about a UF invention
 - o reviewing internal action on a patent application and/or reviewing a draft patent application.

Examples of activities that CANNOT be allocated to Sponsored Programs include the following:

- Proposal-writing (except for non-competing continuations -progress reports):
 - ° Developing necessary data to support the proposal.
 - ^o Writing, editing and submitting the proposal.
- Administration including service as a department chair or dean.
- Instruction, office hours, counseling for students, and mentoring graduate students on something other than a Sponsored Program designated for instruction (e.g., training grant).
- Service on an IRB, IACUC, selection committee, or other similar group.
- Course or curriculum development not specific to the faculty member's research project.
- Writing textbook chapters.
- Service as the primary editor of a journal.
- Peer review of manuscripts, regardless of whether compensation is received.
- Advisory activities for Sponsors, including service on an NIH study section or NSF review panel, regardless of whether or not compensation is received.



3.2. Variations in Effort within a Sponsored Program Budget Period

An effort commitment for a Sponsored Program is measured over an entire project budget period, which is typically one year. During that period, an individual's actual effort may vary. This is acceptable, as long as the individual fulfills the overall effort commitment to the Sponsored Program for the entire budget period.

For example, an individual has committed 30% effort to a Sponsored Program during a nine month period. He expends 40% effort during fall semester and 20% during spring semester. The fall and spring Effort Reporting forms would show the actual percentage of effort, which overall averages of 30%.

3.3. Changes in the Level of Committed Effort

In accordance with 2 CFR 200, a 25% or greater reduction in the level of effort (PI and all key persons named on the award) should be approved *prior to the change and in writing* by the Sponsor's Program Officer. The Director of Contracts is notified by the PI and thereafter notifies the federal agency of the requested change.

The effort committed to the Sponsored Program at the time of the award is the threshold against which a potential change is measured. If an award document does not contain specific language about effort commitments, the grant proposal constitutes the benchmark against which any change is measured.

Sponsors expect original award terms and conditions extend throughout the project period to include a nocost extension (NCE) period. However, federal agencies recognize that effort likely will be reduced during the extension period. Any change greater than 25% for the PI and other named key personnel requires prior approval of the Sponsor and should be included in the NCE request. Upon approval of the extension, the commitments will be updated according to the NCE justification.

3.4. Rebudgeting Versus Changing the Level of Committed Effort

Some Sponsors allow Florida Tech flexibility in budget management. For example, a PI can generally reduce the salary charges for one project staff member and increase them for another. *This rebudgeting authority does not confer the right to make significant changes in the scope of work without prior approval from the Sponsor nor to reduce the level of effort for* the PI and key personnel more than 25% from their original commitment.

3.5. Reduction of Effort Commitments When Awarded Budget is Less Than Proposed

Unless otherwise modified, Sponsors expect PI's (and other key personnel) to provide the level of effort outlined in the proposal, even when the amount funded is less than requested. If the awarded budget is reduced from the proposed budget, the PI determines how the project will be conducted and how funding will be allocated among budget categories. This includes allocation of effort commitments to be documented on the Effort Reporting form by the PI and key personnel.

When an award is made with a budget less than proposed, the PI is responsible for determining whether:

- Effort commitment reductions require an approval request to be sent to the Sponsor. Generally, effort commitments should be reduced when the awarded budget reflects a reduction of 25% or more from the proposed budget; or
- Original effort commitments are retained and other budget categories reduced.

It is the practice of the National Science Foundation (NSF) to request a Budget Impact Statement when the awarded budget is reduced by 10% or more.



3.6. Initiation of New Activities That Change Ongoing Commitments

Multiple Sponsored Programs may have varying start and end dates; and as such, it may be necessary to make adjustments to an individual's effort commitment. For example, a PI allocates 20% of his effort to a grant for each of fall and spring semesters. In January, he receives an award with an effort allocation of 10% thus reducing his effort on the existing grant from 20% to 10%. He will need to adjust his effort percentage allocation on the spring semester Effort Reporting form to reflect these changes.

The PI should notify the Director of Contracts in the Office of Research regarding the effort commitment change on the existing grant.

3.7. Nine-Month Appointments and Summer Salary

Faculty should record actual effort percentages for a Sponsored Program as it occurs in a semester time period. Faculty should ensure that summer salary charges to a Sponsored Program are commensurate with actual effort during the specified period.

Note: Effort expended during the academic year does not satisfy a commitment related to the receipt of summer salary.

The National Science Foundation (NSF) policy precludes senior project personnel from requesting more than 2 months' salary from all NSF awards in any one year. The effort allocation, as recorded on the Effort Reporting form, should reflect this NSF constraint appropriately.

Summer Pay	Allowed Activities
If paid for the full 3 months from Sponsored Programs	Only activities clearly allocable with the Sponsored Program are allowed for the full 3 months. "Charges to Federal awards may include reasonable amounts for activities contributing and directly related to work under an agreement, such as delivering special lectures about specific aspects of the ongoing activity, writing reports and articles, developing and maintaining protocols (human, animals, etc.), managing substances/chemicals, managing and securing project-specific data, coordinating research subjects, participating in appropriate seminars, consulting with colleagues and graduate students, and attending meetings and conferences." See <u>2 CFR 200.430</u> (h)1.i.
If Sponsored Programs pays less than the full 3 months, other time may be uncompensated or paid from non-sponsored funds	For salary charged to Sponsored Programs, the effort must be clearly allocable to the Sponsored Program.

4. Certifying Effort

4.1. Whose Effort Must Be Certified?

Florida Tech will require a faculty member to complete an Effort Reporting form if:

- The faculty is charging salary, in whole or in part, directly to a Sponsored Program, and/or
- The faculty has committed effort on a Sponsored Program, even if no part of his or her salary is charged to the project.

Student and staff effort on a Sponsored Program will be certified by the PI or a responsible person with reasonable knowledge of the student or staff activities. This is done through payroll records obtained from Florida Tech's Human Resources department.



4.2. How is Effort Certified?

A faculty member will complete a Effort Reporting form that documents percentage allocations of effort for research, teaching, and service. Both the individual and unit supervisor sign the form, which certifies the correctness of the information contained therein.

Student and staff member salaries charged to a grant are certified by a payroll report documenting the hours worked for a Sponsored Program. The unit supervisor certifies, via his or her signature, that the effort charged to the Sponsored Program is correct.

4.3. When Must Effort Be Certified?

A faculty member working on a Sponsored Program must certify fall and spring semesters, as well as for a summer commitment, during which the individual devotes effort to the project. This is done by completing the Effort Reporting document and having it certified by the unit supervisor. The documentation is to be completed by the specified due date.

Effort Reports are submitted to both the Office of the Chief Academic Officer and the Office of Research. Student and staff certified payroll reports are submitted to the Office of Research.

The due date for the Effort Reporting forms and certified payroll documentation is typically at the end of each term (semester or summer). Due dates are posted on the Uniform Guidance for Research Web page.

4.4. Who Certifies for Whom?

An Effort Reporting form must be certified by the faculty member whose effort is being reported and his or her unit supervisor. Student and staff payroll documentation may be certified by the PI or by a responsible person who has reasonable knowledge of the reportee's activities during the certification period.

The University's practice is:

- All faculty certify their own effort on the Effort Reporting form.
- The Unit Supervisor signs off on all Effort Reporting forms.
- The PI certifies the effort for all undergraduate and graduate students, postdoctoral staff, and non-PI classified staff.

When a graduate student, postdoctoral trainee, or non-PI classified member staff works on multiple Sponsored Programs for multiple PI's:

- Any of the PI's may certify all of the individual's effort, as long as the certifying PI has suitable means of verifying that the work was performed as allocated.
- Each PI can certify the portion of the individual's effort about which the certifying PI has suitable means of verifying that the work was performed.

4.5. Multiple Grant Efforts with Varying Start and End Dates

The Effort Reporting form shows an individual's effort distribution for a reporting period during which time an individual's grant activity may vary. Grants do not always begin at the start of a reporting period or terminate at the end of a reporting period.

For example, if a faculty member devotes 10% of his or her effort to a project that concludes halfway into the semester, the Effort Reporting form should show 5% effort on that project for the reporting period.



During each reporting period, an individual should certify effort for each Sponsored Program that accurately reflects the portion of the period during which effort was devoted to the project. The effort level for the entire period is calculated as:

(actual effort level) x (fraction of the reporting period during which the effort was devoted)

4.6. Certification for Personnel Who Leave the University

A faculty member working on a Sponsored Program should certify prior to leaving the University. If a faculty member does not certify prior to his or her departure, Sponsored Programs in the Office of Research should make reasonable attempts to request certification of effort after the departure.

If, after reasonable requests the faculty member fails to certify his or her effort, the PI or unit supervisor should identify another person to do so. As with all certifiers, the alternate should have suitable means of verifying that the work was performed. If the PI or unit supervisor has suitable means of verification, he or she can serve as the alternate.

When graduate students, postdoctoral trainees, and classified staff leave the university, PI's can continue to certify their effort just as they would for their current students, trainees, and staff.

5. Adjustments to Effort and Salary Distributions

Recertification of effort is a change to the effort distribution on a certified Effort Reporting form that occurs after submission to Sponsored Programs in the Office of Research.

A recertification request should include justification as to why the previous effort was erroneously certified, and why the requested change is more appropriate within the context of law, federal requirements, or University policies and procedures. These requests along with supporting documentation should be submitted to the Director of Contracts in the Office of Research.

6. Roles and Responsibilities

The roles and responsibilities of individuals involved in the management of Effort Reporting are listed below.

6.1. Principal Investigators and Faculty

- Providing reasonable estimate of the effort required in order to carry out the project statement of work in proposals.
- Expending effort throughout the life of the project.
- Participating actively in fiscal management including providing timely information to departmental
 personnel to facilitate payroll distribution and reviewing charges throughout the life of the project to
 ensure accuracy.
- Ensuring that his or her own effort and that of other individuals working on sponsored activities under his or her direction are certified accurately and in a timely manner.
- Complying with Sponsor requirements regarding any significant reductions (normally <u>></u>25%) in effort commitments on funded sponsored activities.

6.2. Department Heads and Deans

- Ensuring proposals from the department have been reviewed for effort commensurate with the activities of the project and that the resources to provide the commitment are available.
- Approving faculty commitments to Sponsored Programs greater than 90% in any one term.
- Ensuring departmental processes and procedures support the effort reporting process.



6.3. Office of Research Sponsored Programs

- Setting up awards and projects in a timely fashion to facilitate proper charging of salary.
- Coordinating requests for prior approval including pre-award spending and changes in personnel.
- Coordinating and developing principles, policies and procedures in support of accurate and timely certification of effort.
- Reviewing and approving cost transfers in a timely manner to ensure payroll charges remain accurate.
- Reviewing and entering cost sharing expenditures.

6.4. Office of Internal Audit

- Reviewing effort reporting on a regular basis in compliance with the overall audit plans and guidelines for Florida Tech.
- Providing recommendations for system internal control improvements and processes.

ACKNOWLEDGEMENT

Florida Tech acknowledges the University of Florida in providing access to and allowing usage of its materials on Effort Reporting, Uniform Guidance.



APPENDIX A: Effort Reporting Form

EXAMPLE EFFORT REPORTING FORM

EI	FORT REPORTIN	G FORM			
Faculty Name John Doe	Department &	College: Dpt	A; College of	XYZ	
9-Month Faculty 12-Mont		5-1-1-1-	Spring Sur		
				nmer	
Provide a breakdown of your	emort for the semester.	The total mu	ist equal 100%.		
Grant Index Number	FUNDED RESEARCH Grant Index Number Salary Charged to Grant			Percentage of Effort	
of an end of the end o	oning eningen to				
12345	1		10%		
34567			5%		
			0%		
			0%		
		Subtotal	15%	9	
B. RESEARCH (NOT SUPP	ORTED BY GRANT)	Subtotal	15%	9	
C. TEACHING and ADVISI	NC				
	NG		40%		
 Course load 			10%	9	
 Advising 			50%	9	
		Subtotal	50%		
D. SERVICE			10%		
 University Service 					
 Department or College S 	Service		10%	9	
				9	
		Subtotal	20%	9	
E. ADMINISTRATION	Subtotal	0%	9		
F. SABBATICAL OR LEAVI	Subtotal	0%	9		
	TOTAL		100%	100%	
I certify that the information pa	rovided is correct.				
John Doe			12-16-2016		
Faculty Signature			Date		
T. S. Smythe			12-16	-2016	
Department Head or Dean	D	ate			

Note: Effort per activity is recorded as a percentage. All effort activities must equal 100%. The Percentage of Effort column is a decimal number. The form automatically converts it to a percentage.

Online Effort Reporting Form:

www.fit.edu/research/documents/doc_mgr/609/Time%20and%20Eff ord%2010.24.pdf

Dr. Doe's Fall Semester Effort Report

Dr. Doe is a nine-month faculty member.

Dr. Doe has two federal grants.

'12345' has 10% of his salary charged back to the grant. The "Salary Charged to Grant" box is checked and the "Percentage of Effort" box records the 10% allocation.

'34567' does not charge Dr. Doe's salary to the grant. The "Salary Charged to Grant" box is not checked. The "Percentage of Effort" box records the 5% allocation. The percentage of effort falls under research activity specified in his annual appointment letter.

Dr. Doe allocates 15% of effort to a research project not funded by a grant. This percentage of effort falls under the research activity specified in his annual appointment letter.

Dr. Doe has a teaching load and advises students.

Dr. Doe serves on University and College committees.

Dr. Doe's direct supervisor is T.S. Smythe, Department Head. Dr. Smythe's and Dr. Doe's signature certify the correctness of the Effort Report.