Certification

OMB A-21

Effort Reporting

Compliance

Contracts & Grants

Cost Sharing

Effort Reporting System (ERS) Briefing for Principal Investigators

Briefing Content

In this briefing, you will learn about:

- **Effort, Effort Reporting Policies, and Cost Sharing**

- **The Effort Reporting System (ERS)**

- **ERS roles and your responsibilities in ERS**

- **The ERS Effort Report**

- **Reviewing and Certifying Effort in ERS**

- **What to do when you are not the Principal Investigator on every project listed on an Effort Report (Multiple Line Certification)**

Important:

- In this course, the term 'federal projects' refers to all awards from sponsors who require certification of effort.

- In addition to federal and federal flow-through projects, if other sponsors also reference the federal requirements, we include them as requiring certification on the effort report.

What is Effort?

Certification of effort is a Uniform Guidance federal requirement which you agree to when you accept a federal contract or grant. We capture certification of effort on an Effort Report. **This requirement is designed to ensure that:**

1. The percent of effort you expend on each project *is not less than* the percent of effort you committed to the sponsor to spend on the project.
2. The percent of effort you expend on each project *is not less than* the percent of salary charged to the project (taking into account over-the-cap salary limitations and other factors).

Effort is expressed as a percentage of total time spent on work-related activities (instruction, research, administration, etc.) for which the University compensates you. Effort always equals 100% regardless of the number of hours worked or the percentage of the appointment. The government does not make assumptions about number of hours in a work week – they only care about how those hours in total over the certification period were spent on each activity.

For more information on effort reporting, see the **Effort Reporting System Website** at https://controller.berkeley.edu/cga/effort-reporting

What is Effort Reporting?

After-the-Fact Effort Reporting is the method the University uses to certify to federal sponsors that the effort spent on a project is equal to the salaries actually charged plus cost sharing.

Incomplete or improper effort reporting is a compliance violation that could result in audit disallowances and/or withholding of federal research funding.

Payroll distributions in the payroll system are used initially as a method for distributing the salary charges based as an estimate of the effort that was expended in support of various activities in which the individual is engaged.

The **Effort Report** requires you to explicitly certify the percentage of effort expended on each federally funded project and compares this to the percentage of salary charged to each project.

As a Principal Investigator (PI), you are required to certify effort for yourself. If you have first hand knowledge of work performed by your staff, you should certify their reports.

For more information on effort reporting, see the **Effort Reporting System Website** at https://controller.berkeley.edu/cga/effort-reporting

What Effort Reporting policies affect you?

The federal government holds Principal Investigators, Departments, and each UC campus accountable for adhering to the effort reporting policies of the UC Office of the President (UCOP).

Individuals who certify their own effort must keep in mind:

1. The effort committed to the sponsor;

2. The percent of salary paid by the sponsor; and

3. The effort actually expended on the project.

UCOP policy can be viewed at https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/.

If you have difficulty with this link, please copy/paste the URL into your browser.

What Effort Reporting policies affect you?

UCOP's effort reporting policy includes the following points:

- Effort Reports must be **certified within 120 days** of the end of the reporting period.

- Principal Investigators (PIs) are **required to certify their own Effort Reports.**

- Effort Reports must be certified by a person who has **first hand knowledge of the effort performed and the benefiting federally sponsored project(s)**. Examples of those with first hand knowledge are the Principal Investigator, the person who performed the work (e.g., Self-Certifiers), or the person directly supervising the work (e.g., Other Designated Certifiers). PIs generally certify for staff, post-docs, and students.

- Current UC practice is to certify Effort Reports with a preciseness tolerance of **+/-5 percentage points** per activity. [For example, if an Effort Report lists effort at 30% on a project, you can certify it without any changes if actual effort was between 25% and 35% for that project during the reporting period.]

UCOP policy can be viewed at **https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/** if you have difficulty with this link, please copy/paste the URL into your browser.

How is Cost Sharing related to Effort Reporting?

What is cost sharing?
Cost sharing represents the portion of the costs that are NOT charged to the sponsor but to the University or other third-party sources. Cost sharing commitments are made at the time of the proposal. If the proposal is awarded, the institution is then obligated to meet those commitments ("committed cost share").

What cost sharing commitments need to be certified?
Federal regulations require that only **committed cost shared effort** be certified. Uncommitted cost sharing (effort that was spent on the project but was not included as part of the proposal or award) and non-effort based commitments, such as equipment or supplies, are not part of effort certification.

How is cost sharing tracked in the Effort Reporting System (ERS)?
ERS does not "flag" awards that have cost sharing commitments because our campus does not yet have a centralized cost sharing system. Therefore, it is up to the Reviewer and Certifier to know what commitments were made to sponsors and to update Effort Reports to clearly show the effort spent by the individual that was committed to be paid by the institution.

Note: Salary amounts over the NIH salary cap may not be used to meet cost sharing commitments on projects subject to the cap.

The Effort Reporting System (ERS)

Five UC campuses and UCOP worked together to develop an automated Effort Reporting System (ERS).

ERS is designed to:

- Capture certifications online

- Provide accurate and understandable calculations with drill down to the records used in the calculation

- Allow administrators to review reports online and make corrections or comments before the reports are certified

- Monitor compliance and maintain historical records

- Satisfy federally required Effort Reporting requirements

For more information on ERS, check the ERS Website at
https://controller.berkeley.edu/cga/effort-reporting

ERS Roles

Principal Investigator – The primary PI of record for the project is automatically designated as "Certifier" for his/her report and that of his/her staff.

Self Certifier – Non-PI Academics and individuals in Professorial, Professional Research, and Management titles who are responsible for certifying their own effort. Self Certifiers can view and certify only their own Effort Reports.

Reviewer - Department administrators (often called Fund Managers or Research Administrators) who support PIs in the financial management of their contracts and grants. Reviewers can view and modify Effort Reports, but cannot certify.

Effort Report Coordinator (ERC) – ERCs manage the certification process for the department. ERCs organize the Reviewers and Certifiers to ensure that each person knows what to do. ERCs can view Effort Reports, but cannot modify or certify.

Viewer - Unit personnel who require access to view effort reports (often MSOs and Financial Managers). Also available to auditors.

ERS Reporting Cycles

Effort Reports for Academic and Non-Academic personnel are generated on a semiannual schedule, as follows:

Academic & Non-Academic Semiannual Reporting Period	Adjustment Period	ERS Availability	ERS Certification Deadline
1st Semiannual Period (January 1 – June 30)	July – August	September 1	October 31
2nd Semiannual Period (July 1 – December 31)	January – February	March 1	April 30

Effort Reports will be generated 60 days after the close of the reporting period and must be certified within 60 days of their issuance. Federal regulations require effort to be certified within 120 days of the end of the reporting period.

The ERS Process

Step 1:   UCOP generates Effort Reports in ERS within 60 days of the end of the reporting period; ERS automatically notifies department ERCs that Effort Reports are available in ERS.

Step 2:   ERCs review Effort Reports and follow their own departmental process for managing the certification process, including notifying Reviewers, **PIs**, and Self Certifiers.

Step 3:   Reviewers review Effort Reports and modify as needed.

Step 4:   **PIs review all Effort Reports associated with their federal projects, and certify a) their own report & b) reports for his/her non-academic and academic staff if he/she has first hand knowledge of work performed and the benefiting federally sponsored project.**

Step 5:   Self Certifiers certify their own Effort Reports.

Step 6:   ERCs and Extramural Funds Accounting (EFA) monitor compliance.

Certification of effort reports must be completed within 60 days of issuance to meet policy requirements and to avoid compliance violations.

The PI & Reviewer's Responsibilities

The PI is responsible for ensuring the data on each Effort Report is correct before certifying. PIs should work closely with their Reviewer throughout the life of an award to ensure that payroll and effort is recorded and reported correctly.

The Reviewer is responsible for reviewing all of the Effort Reports on the PI's *My Projects* list and modifying those reports as needed.

Specifically, the **Reviewer** ensures the following data is correct in ERS:

- **Payroll** matches what the sponsor committed to pay <u>and</u> any changes communicated by the PI, including pending Payroll Expense Transfers.

- **Effort** spent by the individual is appropriately reflected on the Effort Report for each project. The employee's commitments on federal projects are indicated on key documents including proposal budgets and justifications, awards, sponsor letters about effort, and the Other Support page.

- **Cost Sharing** reflects the effort spent by the individual that was committed to be paid by the institution. If the employee committed cost shared effort with no salary charged to the sponsored project, the Reviewer will need to add the project to the Effort Report.

Working with Your Reviewer

After the Reviewer has completed the review and modification process, the Reviewer and PI should work together at a computer to review and certify each Effort Report (at least for the first cycle or two).

Remember: *The Reviewer cannot certify Effort Reports – only the **PI** or the **individual** to whom the Effort Report belongs can certify a report.*

Benefits of this approach include:

- The Reviewer can assist you with ERS tasks and features.

- The Reviewer can highlight modifications made to reports, and discuss why changes were made.

- You can collaborate with the Reviewer on additional changes needed to reports.

Accessing ERS

To access ERS, go to
https://ers.ucop.edu/ucb

Login and then enter your CalNet Authentication ID and passphrase.

rt Reporting is intended to ensure that individuals confirm "after-the-fact" for effort expended on erally funded activities. The confirmation certifies they have received compensation from federal fund rces and they have expended effort on the federally funded project, at a minimum, in the same centage they are paid.

ernment sponsors expect to pay only for those portions of employee effort that are actually devoted to r projects. Periodically, government and internal auditors review our payroll charges to enforce this ectation. In conducting these audits, they are assessing whether the salary charged to awards is for rt that appropriately benefited those projects over the reporting period.

itors review the accuracy of our payroll charges by verifying that the percentage of the employee's ry charged to a sponsored project reasonably approximates the actual proportion of the employee's effort devoted to that project. The Effort Reporting System is frequently called upon to provide this fication to audits.

rt Reporting must be completed and certified on a regular basis in accordance with the terms stated MB A-21 . Failure to meet these requirements puts the University at risk for audit disallowances ulting in significant financial penalties. In recent years, several major universities have been assessed e penalties and/or agreed to settlements due in part to effort reporting violations: Northwestern versity for $5.5 million; University of Southern Florida, for $4.1 million; Johns Hopkins for $2.6 million; vard University for $3.3 million; and University of Alabama Birmingham for $3.39 million.

EW - Information on Current Effort Certification Period

- System roles
- Effort reporting schedule
- Effort report coordinators
- Effort reporting glossary
- ERS training
- CGA Training

ERS Login

Access to the ERS System requires prior successful completion of ERS online training modules and a passing score on an online quiz. Training modules and the quiz are available in the UC Learning Center.

To request access to the ERS System, complete this ERS User Access Form (DOC) and submit it according to the instructions on the form.

How do I find the Effort Reports I need to review?

When you sign in to ERS, **Effort Report List** page appears. This page will display a **My Projects** search. This report includes Effort Reports for everyone paid from your federal projects.

Your Reviewer can demonstrate sorting techniques to help with reviewing and certifying tasks, and can explain the functionality on this page.

Click on any row to view or certify an Effort Report.

Note: If you do not find your Effort Report on the **My Projects** list, change **Display Saved Search** to **My Effort Reports**.

If you have **questions** while reviewing and certifying your effort report, there are several sources of additional information. The "**ERS Website**," "**Glossary**," and "**Job Aids**" links are located in the top header. Your **Department Reviewer**, **ERS Coordinator**, and **Grants Manager** are also available to answer your questions.

As PI you are responsible for ensuring that all effort reports for your projects are certified accurately within 60 days of issue.

What are the numbers in the Payroll % columns?

This is an **Effort Report**.

The header displays the person and period for the displayed report.

Payroll % shows the percent of total salary paid to the employee during the reporting period.

Adjusted Payroll % is used to record changes to the original payroll %.

When an Effort Report is created, **Adjusted Payroll %** defaults to the original **Payroll %**.

Changes in the adjusted payroll column require additional actions in the Online Payroll Time Reporting System.

What are the numbers in the Cost Sharing % column?

Your Reviewer updates the **Adjusted Cost Share %** to reflect the effort spent on the project that was paid by other UCB fund sources.

When cost shared effort is added to a sponsored project, an equal amount is subtracted from **Non-Sponsored Activities (Note: there must be an allocated payroll % in order to enter the equivalent effort amount)**.

Cost Sharing % column should always total 0%. ➡

Note: If the employee cost shared effort on a sponsored project where s/he had NO payroll, the Reviewer will need to add the project to the report.

A comment is required when adjustments are made.

| Edit Report | View/History | Comment Log |

Version: 1.0 (04/01/2007 09:35) | Status: Open
Service Period: July 1, 2006 to September 30, 2006
Pay Periods: July 1, 2006 to September 30, 2006

Federally Sponsored Projects	Payroll %	Adjusted Payroll %		Adjusted Cost Share %	Original Total %	Total Effort %
10988-24197-NPSAL NSF-AST-0540567-BLITZ-05/08	49%	49 %		10 %	49%	59%
23644-13058-PHATL AST-0138348-LEE-7/07	26%	26 %		0 %	26%	26%
				ADD ADDITIONAL SPONSORED PROJECT		
Total Federally Sponsored Projects	75%	75%		10%	75%	85%
Other Sponsored Projects	0%	0 %		+ 0 %	0%	0%
Non-Sponsored Activities	25%	25 %		− 10 %	25%	15%
Total Other and Non-Sponsored	25%	25%		-10%	25%	15%
Grand Total	100%	100%		0%	100%	100%
				UPDATE CALCULATION		

Report options:
☐ Report requires multiple certifications.
☐ Report allows for Add Cost Sharing Against Other Sponsored Projects.

Add a comment:
Adjusted Cost Sharing: 10% Adjusted Cost Share added to 10988-24197-NPSAL from the original effort paid from Non-Sponsored Activities to cover the committed cost-shared effort Dr. Investigator committed to 10988-24197-NPSAL.

Comments can be up to 255 characters long. (Total characters: 224)

| VIEW PAYROLL DETAILS | | REVERT | SAVE | CERTIFY EFFORT REPORT |

What are the numbers in the Total Effort % column?

Total Effort % is the sum of **Adjusted Payroll %** and **Adjusted Cost Share %**.

Grand Total effort must always equal 100% in order for the Effort Report to be certified.

Remember that total effort for a person in a reporting period is 100% regardless of the number of hours worked or the percentage of appointment.

What do I need to review?

The Reviewer reviews all Effort Reports that appear in your **My Projects** list, and modifies those reports as needed.

The **PI ensures** the data is correct in the Payroll and Cost Sharing columns before certifying.

If either the original payroll % or cost share % are incorrect or incomplete, the report must be edited before it can be certified. Contact your Reviewer to make corrections. The Reviewer will also add a brief explanation in the comments box.

Contact your Reviewer if you have questions or need assistance.

Federally Sponsored Projects	Payroll %	Adjusted Payroll %		Adjusted Cost Share %	Original Total %	Total Effort %
10988-24197-NPSAL NSF-AST-0540567-BLITZ-05/08	35%	25 %		0 %	35%	25%
23644-13058-PHATL AST-0138348-LEE-7/07	20%	20 %		0 %	20%	20%
					ADD ADDITIONAL SPONSORED PROJECT	
Total Federally Sponsored Projects	55%	45%		0%	55%	45%
Other Sponsored Projects	45%	45 %	+	0 %	45%	45%
Non-Sponsored Activities	0%	10 %	–	0 %	0%	10%
Total Other and Non-Sponsored	45%	55%		0%	45%	55%
Grand Total	100%	100%		0%	100%	100%

UPDATE CALCULATION

Report options:
☐ Report requires multiple certifications.
☐ Report allows for Add Cost Sharing Against Other Sponsored Projects

Total Effort must equal 100% to be certified.

Add a comment: Adjustment: Reduced 10% from 10988-24197-NPSAL because Dr. Investigator reduced effort on 10988-24197-NPSAL by 10% and began devoting 10% effort to Non-Sponsored Activities beginning 11/1/07.

Comments can be up to 255 characters long. (Total characters: 191)

VIEW PAYROLL DETAILS   REVERT   SAVE   CERTIFY EFFORT REPORT

How do I certify an Effort Report?

After you have reviewed and verified all of the data on an Effort Report, click **Certify Effort Report** at the bottom of the report.

ERS responds with a prompt box asking you to verify that you have first-hand knowledge of the effort.

Click **Certify** to complete the certification process for this report.

The next Effort Report on your Report List will automatically open for your review and certification.

Federally Sponsored Projects	Payroll %	Adjusted Payroll %		Adjusted Cost Share %		Original Total %	Total Effort %
10988-24197-NPSAL NSF-AST-0540567-BLITZ-05/08	35% 🔍	25 %		0 %		35%	25%
23644-13058-PHATL AST-0138348-LEE-7/07	20% 🔍	20 %		0 %		20%	20%
					ADD ADDITIONAL SPONSORED PROJECT		
Total Federally Sponsored Projects	55%	45%		0%		55%	45%
Other Sponsored Projects	45% 🔍	45 %	+	0 %		45%	45%
Non-Sponsored Activities	0% 🔍	10 %	−	0 %		0%	10%
Total Other and Non-Sponsored	45%	55%		0%		45%	55%
Grand Total	100%	100%		0%		100%	100%
					UPDATE CALCULATION		

Report options:	☐ Report requires multiple certifications.
	☐ Report allows for Add Cost Sharing Against Other Sponsored Projects.

Add a comment:	Adjustment: Reduced 10% from 10988-24197-NPSAL because Dr. Investigator reduced effort on 10988-24197-NPSAL by 10% and began devoting 10% effort to Non-Sponsored Activities beginning 11/1/07.

Comments can be up to 255 characters long. (Total characters: 191)

VIEW PAYROLL DETAILS   REVERT   SAVE   CERTIFY EFFORT REPORT

I◄ ◄ Report 1 of 1 ➡ ➡I

What about Effort Reports where I am not the PI on every project?

As you've learned, each Effort Report on your **My Projects** list is for an individual paid from one of your federal projects.

When an Effort Report contains multiple projects where each is owned by a different PI, that report also appears on other PIs' My Projects lists. Effort Reports like this may require certifications by multiple PIs if no single PI has **first hand knowledge** of ALL the work performed by the individual.

ERS has a **Multiple Certification** feature that allows each sponsored project line of an Effort Report to be certified individually. Either the Reviewer or the PI can activate this feature.

For an Effort Report with multiple projects and PIs, it is up to you to determine whether you have **first hand knowledge** to certify the report in its entirety or whether to activate the **Multiple Certification** feature so other PIs are responsible for certifying effort for the individual's Effort Report. Typically your **Reviewer** will activate the Multiple Certification feature.

Important: If an Effort Report has the **Multiple Certification** feature activated AND at least one of the lines is already certified by another PI, <u>do not deactivate</u> the **Multiple Certification** feature as this will eliminate the certifications already captured for that Effort Report. This will trigger an ERS notification to the PIs who previously certified the individual projects. If you believe that the Multiple Certification feature was activated in error, contact your Reviewer.

Which PI owns the Project?

Roll your cursor over the project title and a window pops up displaying the PI name and other award information.

This feature will help you identify other PIs who may also need to certify the Effort Report.

Activating Multiple Certifications

If you determine that you cannot certify the entire Effort Report yourself, and Multiple Certification is not displayed, you will need to activate the **Multiple Certification** feature.

Check "**Report requires multiple certifications**" in the Report Options section.

ERS will issue an alert that this will result in each line of the Effort Report requiring individual certification.

Click "**OK**" to confirm.

Certifying Effort for a Single Project

A new **Line Certified** column appears on the right side of the report.

Check the box on the project line you want to certify.

Review and adjust the line for incomplete or incorrect effort in the adjusted payroll % and/or cost sharing % columns. Contact your Reviewer to make corrections. The Reviewer will also add a brief explanation in the comments box. When you are satisfied that effort on the checked line is correct, click "**Save**" to certify the report.

Note: When the **Multiple Certifications** feature is activated, the Save button serves as the Certify button.

Edit Report	View/History	Comment Log

Version: 1.1 (01/02/2008 04:45) | Status: Partially Certified
Service Period: July 1, 2006 to September 30, 2006
Pay Periods: July 1, 2006 to September 30, 2006

- This report will remain open until all lines of the report have been certified.

Federally Sponsored Projects	Payroll %	Adjusted Payroll %		Adjusted Cost Share %	Original Total %	Total Effort %	Line Certified
10988-24197-NPSAL NSF-AST-0540567-BLITZ-05/08	49%	49 %		0 %	49%	49%	☐
23512-12067 WSP-P033A060638 06-07 On	26%	26 %		0 %	26%	26%	☐
				ADD ADDITIONAL SPONSORED PROJECT			
Total Federally Sponsored Projects	75%	75%		0%	75%	75%	
Other Sponsored Projects	0%	0 %	+	0 %	0%	0%	
Non-Sponsored Activities	25%	25 %	−	0 %	25%	25%	
Total Other and Non-Sponsored	25%	25%		0%	25%	25%	
Grand Total	100%	100%		0%	100%	100%	

UPDATE CALCULATION

Report options:
- ☑ Report requires multiple certifications.
- ☐ Report allows for Add Cost Sharing Against Other Sponsored Projects.

Add a comment:

Comments can be up to 255 characters long. (Total characters: 0)

VIEW PAYROLL DETAILS		REVERT	SAVE	CERTIFY EFFORT REPORT

Certifying Effort for a Single Project

The certification appears under the project(s) you have certified.

Until all projects have been certified, the report status will be "Partially Certified." Once all the lines are certified, the report status will become "Certified."

Important: After a line has been certified for an Effort Report requiring multiple certifications, if you were to deactivate the **Multiple Certification** feature, all of the certifications captured for the Effort Report would be lost.

| Edit Report | View/History | Comment Log |

Version: 1.1 (01/02/2008 04:45) | **Status: Partially Certified**
Service Period: July 1, 2006 to September 30, 2006
Pay Periods: July 1, 2006 to September 30, 2006

> ▪ This report will remain open until all lines of the report have been certified.

Federally Sponsored Projects	Payroll %	Adjusted Payroll %		Adjusted Cost Share %	Original Total %	Total Effort %	Line Certified
10988-24197-NPSAL NSF-AST-0540567-BLITZ-05/08	49%	49%		0%	49%	49%	☑
	Line certified by 70238 on **January 2, 2008**						
23512-12067 WSP-P033A060638 06-07 On	26%	26 %		0 %	26%	26%	☐
					ADD ADDITIONAL SPONSORED PROJECT		
Total Federally Sponsored Projects	75%	75%		0%	75%	75%	
Other Sponsored Projects	0%	0 %	+	0 %	0%	0%	
Non-Sponsored Activities	25%	25 %	−	0 %	25%	25%	
Total Other and Non-Sponsored	25%	25%		0%	25%	25%	
Grand Total	100%	100%		0%	100%	100%	
					UPDATE CALCULATION		

Report options: ☑ Report requires multiple certifications.
☐ Report allows for Add Cost Sharing Against Other Sponsored Projects.

Add a comment:

Comments can be up to 255 characters long. (Total characters: 0)

VIEW PAYROLL DETAILS — REVERT — SAVE — CERTIFY EFFORT REPORT

▐◄ ◄ Report 1 of 38 ⇨ ⇨▌

Conclusion

This concludes the ERS Briefing for Principal Investigators. In this briefing, you learned about:

- **Effort, Effort Reporting Policies, and Cost Sharing**

- **The Effort Reporting System (ERS)**

- **The Reviewer role and your responsibilities in ERS**

- **The ERS Effort Report and how to complete it**

- **Certifying Effort in ERS**

- **What to do when you are not the PI on each project listed on an Effort Report**

Please contact your Department Manager to identify the **Reviewer** assigned to review and modify the Effort Reports in your **My Projects** list.

Your Department **Reviewer** and **ERS Coordinator** are available to answer your questions on ERS. Additional information on effort, effort reporting, and ERS is also available at https://controller.berkeley.edu/cga/effort-reporting.