

Effort Certification FAQs

Why is Effort certification necessary?

Effort Certification is an internal University process designed to meet regulatory requirements for maintaining records that accurately reflect the work (effort) performed on federally sponsored agreements. Office of Management and Budget (“OMB”), as part of [2 CFR 200.430 \(j\)](#), provides standards for documentation of personnel expenses to federally sponsored research projects. These standards are detailed in the University’s [Effort Reporting Policy](#). Effort directly related to organized research and all other activities for which an individual is compensated must be identified in the University’s certification process (2 CFR 200.430 (i) (1) (iv)).

Federal agencies are accountable to Congress and to the public for the use of public funds. Effort Certification Reports provide documentation that demonstrates accountability for the use of funds. Labor expenditures represent approximately two-thirds to three-quarters of university expenditures related to grants.

What is Effort?

Effort is defined as the proportion of time spent on any University-compensated activity and is expressed as a percentage of the total University activity for an individual. Total effort for an employee must equal 100% and include all University compensated activities—both on sponsored programs and non-sponsored. It does not represent hours worked, but rather a percentage of compensated time.

What is Effort Certification Reporting?

Effort Certification Reporting is an attestation that salaries and wages charged to sponsored agreements (including cost sharing) and other university activity categories are **reasonable** in relation to the effort expended.

When is Effort Certification required?

Certifications are necessary whenever a researcher is performing work on an externally-sponsored activity. This also includes work compensated by cost share funding.

Who can certify an Effort Report?

The employee or a responsible official with direct knowledge of the work performed can certify. This includes the PI or Co-PI. A designee who has sufficient knowledge of the research activities may certify an Effort Report in the place of a PI or a Co-PI if those individuals are not able to certify.

What is “sufficient knowledge”?

To have sufficient knowledge of the research activities, absent direct supervision, the certifier must have written documentation sufficient to support a reasonable estimate of effort by an employee. Oral verification is NOT support for having sufficient knowledge. Documentation must be retained for audit purposes to support the certification, consistent with the University’s record retention requirements.

Examples of suitable means of verification include:

- Calendar – detailed
- Meetings – agenda, notes, minutes, attendees list
- Lab books/notes
- Time and attendance sheets/Sign-in sheets

- Travel reports
- Award work products – presentations, reports or analyses completed, surveys/interviews conducted, events held, log of services performed, published documents
- Other written documentation – memos, e-mail

When is effort certified?

Effort is certified semi-annually for the periods of January 1st to June 30th and July 1st to December 31st.

How is effort certified?

Effort is certified via summary effort reports. These are delivered to the departments for distribution to Principal Investigators 30 days after the certification period ends. Effort reports must be certified and returned to RSPA within 90 days of the end of the certification period.

My Effort Report includes effort on multiple grants, some of which are not mine. Do I need to certify the entire report?

Unless you have sufficient knowledge of those activities and can certify on another's behalf, you are only certifying the effort for your awards. You may need to work with the employee to understand their effort on your award in relationship to total effort however it is the responsibility of the other PI to actually certify this effort. They will automatically receive an effort report which includes the same information.

What happens if a report is late?

The University has an expectation of 100% compliance with the Effort Certification process. In the event a report is not received, RSPA will follow up according to the contact chain below:

- 1st contact – email to Departmental Administrator
- 2nd contact – email to PI
- Escalate as needed

All follow-up will be completed within the 90 day certification window

What if the Effort Certification Report is incorrect?

If an employee's salary distribution does not reasonably reflect their actual effort on the Effort Certification Report, the certifier should manually correct the effort report to show the correct level of effort. Concurrently, the certifier should work with his/her departmental administrator to modify the employee's salary distribution by submitting a labor redistribution change via ldc.nd.edu to reflect the correct level of effort. The corrected effort certification report should be returned to Research and Sponsored Programs Accounting along with a copy of the On-line labor distribution change generated to correct the employee's salary distribution.

May I redistribute salary for an employee whose effort has already been certified?

Except in documented extenuating circumstances, once an effort report is certified, no further changes should be made to an employee's salary distribution. The only changes that would be allowed and not considered extenuating circumstances are changes that do not affect the employee's level of effort on a sponsored project. Examples of this include:

- A salary transfer between a sponsor fund and a related cost share fund
- A salary transfer between two non-grant funds

What is the difference between Payroll and Effort?

Payroll and Effort are both a by-product of the compensation cycle but are used to designate different parts of that process. Payroll is an accounting for the funding sources of the individual's salary. An individual's effort is the allocation of the individual's activity which may occur differently than in an award proposal or than in the current payroll system due to various factors which may include appointment to new positions within the University (i.e. Department Chair), change in teaching responsibilities, or receipt of new awards.