# Arkansas State University Sponsored Programs Accounting Effort Certification Procedures

## **Background**

Effort certification is a process in which employees of sponsored projects certify that their time was spent in conformance with commitments made to a project; this is required by Office of Management and Budget 2 CFR 200. In most cases, the certification corresponds to the salary charged to the project. In other cases, it reflects the University-funded commitment to the project. The University funding often includes mandatory or voluntary cost sharing commitments.

### **Salary Basis for Certification**

For nine-month faculty and employees, the institutional base salary for effort certification purposes is the normal nine-month salary. This includes any buyout portion of the academic year salary; overload assignments are not included and are not part of the certification. The same treatment is applied for ten-month and twelve-month employees. Any pay that is received outside the contract period (for example, summer pay for a nine-month employee) should be treated as certifiable effort.

# **Responsibility for Certification**

All employees of externally-funded projects are required to participate in the effort certification process. Full-time employees should certify their own effort whenever possible. If a situation arises which prevents a full-time employee from certifying, such as long-term absence or termination of employment, the principal investigator can certify on the employee's behalf. The principal investigator should also certify for all student and part-time employees. Department chairs or deans may function as alternate certifiers in some circumstances.

It is important to note that certification on behalf of another individual should only occur if the alternate certifier has suitable means to verify that the effort is reflected correctly on the effort certification; in other words, the alternate certifier should have first-hand knowledge of the work performed. It is assumed that the principal investigator will have this knowledge due to the responsibility for project oversight. In no circumstances should an individual certify for another without knowledge of actual effort provided to the project.

#### **Certification Timeline**

Effort certification will occur on a semesterly basis through the Self-Service Banner system, with the following timeline for each certification period:

Semester	Period Covered by Certification	<b>Certification Completion Dates</b>
Spring	January 1-May 15	June 1-30
Summer	May 16-August 15	September 1-30
Fall	August 16-December 31	February 1-March 2

The Office of Sponsored Programs Accounting (SPA) will perform an extract process in the Banner system to process the effort reports. An email will be sent to each certifier when the process is complete and the report is available for certification. A daily email notification will be sent to each certifier until his or her effort has been certified. Further emails on uncertified reports will be sent as follows:

- Two weeks after reports are available notification to alternate certifiers; this is usually the department chair.
- Three weeks after reports are available notification to alternates and deans. A spreadsheet showing individuals who have not yet certified will be attached to the deans' emails.
- Four weeks after reports are available notification to alternates, deans and FYI Reviewers
   (Provost, Associate Vice Chancellor of Research, and Director of Sponsored Programs
   Accounting). A spreadsheet showing individuals who have not yet certified will be attached to
   these emails, with the exception of notification to the alternates.

### Labor Redistributions after the Effort Report is Generated

In some circumstances, the effort report may not accurately reflect the work performed over the course of the semester. A variance of up to 5% is allowable. If a larger variance occurs, the certifier should request a salary reallocation to reflect the actual level of effort. An email should be sent to Sponsored Programs Accounting requesting the reallocation, with a copy to the PI (if certifier is not the PI), department chair, and dean. The department chair and dean should reply to the email, copying the other parties, to indicate acceptance of the change. SPA will request the reallocation from the budget office, and update the effort certification after processing. The certifier(s) will be notified when the updated effort report is available.

# **Failure to Certify**

It is expected that all effort certifications will be completed in a timely manner. Failure to comply with this requirement could jeopardize all federal funding received by the University. Because of this, it is necessary to have consequences in place to minimize risk to the University.

If an individual's effort certification is not completed within the allotted four week period, the associated salary and fringe benefit expenditures may be reallocated to the principal investigator's department. In addition, no further expenditures will be allowed on the project until the certification has been completed.

Notification of these actions will be sent by SPA to the principal investigator, with a copy to the department chair, dean, and the Associate Vice Chancellor of Research.