



INDIANA UNIVERSITY

Effort Certification under OMB-A21

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Effective: 1 March 2011
Last Updated: 1 March 2011

Responsible University Office:
Office of Research Administration

Responsible University Administrator
Steven A. Martin, Associate Vice President for Research

Policy Contact:
James P. Becker, Executive Director of Grants and Contract Services

Scope

This policy applies to Indiana University faculty, staff and students, including approved practice plan employees, paid all or in part on sponsored research accounts in order to confirm that the payroll distribution of their institutional base salary on sponsored research accounts reasonably reflects their actual activity.

Policy Statement

It is the policy of Indiana University that all faculty, staff and students paid on sponsored research accounts confirm their effort on such sponsored program accounts by means of effort certification. Effort certification documents shall be issued at standard intervals and must be reviewed, corrected (if applicable) and approved within 60 days after issuance.

Reason for Policy

To establish guidelines and best practices for timely and accurate payroll confirmation of Indiana University faculty, staff and students, including approved practice plan employees, paid all or in part on sponsored research accounts as required by OMB Circular A-21.

Procedures

Effort certification documents are issued at standard intervals throughout the year as detailed on the Office of Research Administration website.

http://researchadmin.iu.edu/GrantContract/gc-ace/ace_calendar.html

For each project/account in the employee's regular pay distribution, effort certification documents are routed for approval in the Indiana University financial system. The individuals in the document routing have the responsibility for verifying that the effort provided by the employee on the various projects corresponds to the pay distribution across those projects.

Effort certification documents may only be certified by persons who can personally verify the activity of the individual on the effort certification document. Individuals capable of verifying the effort would include the employee, the principal investigator, or a responsible official using suitable means of verification that the work was performed.

Individuals in the document routing may approve the effort certification document only if they can personally verify, (i.e. have first-hand knowledge of) the activity of the employee.

If they cannot personally verify the activity of the employee, they may do one of the following:

1. Ad-hoc route the document to another Indiana University financial system user who can verify the individual's activity.
2. Copy e-mail or other electronic document into the notes screen from an individual who can verify the individual's activity, confirming the effort distribution.

Individuals providing e-mails or other electronic documents confirming the employee's effort must reference the effort certification document number and also the account numbers for which they are confirming effort.

Multiple notes and attachments are permitted on the effort certification documents, so this method may be preferable for individuals who have worked for multiple principal investigators or who have worked in multiple units.

3. Some departments or units track employee effort through timesheets signed by the employee that record not only hours worked but also the specific projects or activities of the individual. In such cases, the timesheets may serve as sufficient documentation to approve the effort certification document.

Effort certification documents must be reviewed, corrected (if applicable) and approved within 60 days after issuance by the Office of Research Administration.

For Indiana University effort certification documents still unapproved at 60 days past issuance, all salaries (effort) posted to federally sponsored projects appearing in the effort certification document(s) in question will be removed to a non-sponsored account unless an exception to the certification and approval deadline has been granted by the Office of Research Administration.

The exception process is as follows:

1. Exceptions to the effort certification and electronic document approval deadline may be granted by the Office of Research Administration for certain extenuating circumstances. Examples would be an extended illness of the certifier or a change in personnel that delayed certification.
2. Exceptions must be formally communicated to the Office of Research Administration via e-mail at least five days before the certification deadline. E-mails may be sent to ORA_ACE@indiana.edu
3. Upon acceptance of the extenuating circumstance by the Office of Research Administration a defined extension period will be communicated to the Fiscal Officer or Account Delegate of record in the Indiana University financial system. A maximum of two certification extensions may be granted, each in 14-day increments.

Delinquent effort certification documents pose a significant audit risk for the university. Repeated exception requests indicate poor internal controls and will be heavily scrutinized by the Office of Research Administration. Ongoing problems will be elevated to departmental senior administration.

Approved Practice Plan Effort

Those Indiana University departments authorized to recover approved practice plan employee salary costs through sponsored research accounts are responsible for approved practice plan effort certification and must follow the guidelines established in this policy.

Definitions

Approved Practice Plans: Those practice plans approved by Indiana University to recover salary costs related to research conducted under the auspices of Indiana University.

Effort certification documents: Personnel activity reports that are issued periodically by the Office of Research Administration for each individual paid or cost-shared on a sponsored research account. Effort certification documents are

based on the individual's salary and wage distribution by account/project and are routed to the fiscal officer, account delegate, or A-21 delegate of record for each account on the document.

Suitable Means of Verification: At Indiana University "suitable means of verification" includes any documentation, including e-mail documentation, sent directly from the employee, supervisor or Principal Investigator of a specific sponsored project (account) listed on the effort certification document stating exactly the effort period, document number, account number(s), and applicable percentage effort allocation(s).

Institutional Base Salary: The annual salary received for a payroll appointment. At Indiana University this is defined as base pay applicable to an appointment. This includes, if appropriate, compensation from both Indiana University and an approved practice plan.

Sanctions

Failure to certify and approve effort certification documents within communicated timeframes and deadlines may result in removal of effort from any federally sponsored project included in the effort certification document to a non-sponsored account, or in the case of recovered approved practice plan compensation, the effort would be moved to a non-sponsored account.

Inaccurate or misrepresented effort certifications pose a significant audit risk to the university and will result in removal of the effort in question from the project.

Additional Contacts

<i>Subject</i>	<i>Contact</i>	<i>Phone</i>	<i>E-mail</i>
Policy Implementation	Tim Burris, ACE Compliance Analyst	(812) 855-0185	thburris@indiana.edu
Policy Implementation	Jan Young, ACE Team Manager	(812) 855-5326	jyoung@indiana.edu

Forms

NA

Related Information

OMB Circular A-21

http://www.whitehouse.gov/omb/circulars_a021_2004

Office of Research Administration Effort Certification website:

http://researchadmin.iu.edu/GrantContract/gc-ace/ace_effort.html

History

Replaces:

- III-100: "A21 Effort Reports"
- Important Notice 03-3 "A21 Effort Reports"