



# INDIANA UNIVERSITY

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## Effort Recertification under OMB A-21

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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 Administration*

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

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## Scope

This policy applies to Indiana University faculty, staff and students for whom a recertification of a previously certified and approved Indiana University effort certification document is being requested, or effort was applied to a non-sponsored research account at the time of effort certification document issuance.

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## Policy Statement

It is the policy of Indiana University that effort recertifications are generally not allowed. To be allowed they must be approved in advance by the Office of Research Administration and include significant justification.

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## Reason for Policy

To establish guidelines and best practices for effort recertifications for Indiana University faculty, staff and students, including approved practice plan employees, paid all or in part on sponsored research accounts.

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## Procedures

Effort recertifications are submitted online through the Office of Research Administration website. [http://researchadmin.iu.edu/GrantContract/gc-ace/effort\\_recreate1.html](http://researchadmin.iu.edu/GrantContract/gc-ace/effort_recreate1.html)

The Office of Research Administration conducts an initial review of effort recertification requests in order to determine the audit risk posed to the university. Requests must include the following information:

- A statement of how the error in effort certification or failure to apply effort to the sponsored project(s) was identified.
- A statement of what caused the effort certification error.
- A full description of the processes or procedures implemented to avoid future errors.

Upon review by the Office of Research Administration if it is determined there is an elevated audit risk to the university, the request will be forwarded to the Office of Research Administration Cost Exception Committee for further review.

Risk factors elevating audit risk include:

- Moving effort onto a federally sponsored research account
- Removing effort from a federally sponsored research account to another sponsored research account
- Effort being moved to another sponsored project to remove an account overdraft

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.

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## Definitions

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

**Effort Certification Documents:** Effort certification documents are 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.

**Effort Recertification:** Any reallocation of effort on a previously certified Indiana University effort certification document. The term effort recertification also applies

to individuals whose effort was applied to a non-sponsored account at the time of effort certification document issuance.

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## Sanctions

Failure to follow this policy 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 will result in removal of the effort in question from the project.

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## Additional Contacts

<i>Subject</i>	<i>Contact</i>	<i>Phone</i>	<i>Email</i>
Effort Certification	Tim Burris, ACE Compliance Analyst	(812) 855-0185	<a href="mailto:thburris@indiana.edu">thburris@indiana.edu</a>
Effort Certification	Jan Young, ACE Team Manager	(812) 855-5326	<a href="mailto:jyoung@indiana.edu">jyoung@indiana.edu</a>

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## Forms

NA

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## Related Information

A-21, OMB Circular A-21

[http://www.whitehouse.gov/omb/circulars\\_a021\\_2004](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](http://researchadmin.iu.edu/GrantContract/gc-ace/ace_effort.html)

Office of Research Administration Cost Transfer Policy

<http://researchadmin.iu.edu/Policies/Cost%20Transfer%20Policy.pdf>

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## History

Replaces:

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