Time and Effort Reporting Policy

Purpose:

As a recipient of federal funds Coastal Carolina University must comply with the Office of Management and Budget (OMB) Circular A-21 (Cost Principles for Educational Institutions). Section J.10 requires certification of effort to document salary expenses charged directly or indirectly against federally-sponsored projects. This process ensures that salaries and wages are properly expended and that actual effort is consistent with the originally anticipated (budgeted) effort. Coastal Carolina University’s effort reporting policies and procedures are intended to meet this requirement.

Policy Statement:

1. Time and effort reporting shall reasonably reflect the percentage distribution of effort expended by Coastal Carolina University employees involved in federally funded grants, contracts, and cooperative agreements, and shall be incorporated into the records of the Office of Research Services. These reports shall reasonably reflect the activity for which the employee is compensated and shall encompass all activities on an integrated basis.

2. Each employee whose time is committed to a federally sponsored project shall complete a time and effort report. This report is required regardless of whether such time is paid by a federally sponsored agreement, a private foundation, or is an unpaid contribution, i.e. cost share match. Committed cost sharing, either voluntary or mandatory, must be included in effort reports.

3. Coastal Carolina University uses an “after-the-fact effort” reporting system. This indicates that the distribution of salaries and wages will be supported by activity reports signed by the Principal Investigator (PI).

4. The Office of Research Services is responsible for the distribution, collection, and retention of all employee time and effort reports. Individually reported data will be made available only to authorized auditors.

5. The Time and Effort report must represent, in percentages totaling 100%, a reasonable estimate of an employee’s effort for the period being reported. Compensated effort includes all research, teaching, administration, service, and any other activity for which an individual received compensation. Note: It is recognized that research, instruction, and service are often inextricably intertwined and estimates will be necessary in most cases.

6. Effort and payroll distributions are NOT the same. The effort reporting process is a method for confirming salary charges made to all sponsored awards. Payroll distributions are estimates of how effort is anticipated to be expended.

7. Certain sponsors limit the annual rate of salary reimbursement. PIs must still devote the full committed effort as proposed and awarded without regards to the salary reimbursement limitation.
8. The federal government can impose severe penalties and funding disallowances as a result of missing, inaccurate, incomplete, or untimely effort reporting. Coastal Carolina University expects PIs will submit time and effort reports completely and in a timely manner. A new grant proposal submission will only be permitted if the PI's time and effort reports are up to date. Further, at the discretion of the administration, payment for effort expended on the grant may be withheld if time and effort reports are not complete. Coastal Carolina University also reserves the right to charge cost disallowances on sponsored projects resulting from the PI’s failure to submit appropriate time and effort reports to the Office of Research Services.

**Procedures:**

1. When a PI receives an award from an external sponsor the Office of Research Services will prepare a projected distribution of effort for the expected duration of the grant based on the budget and commitment indicated in the grant. The Post-Award Services Manager will send time and effort reporting forms to the PI before the end of each semester.

2. Unless special circumstances apply, all time and effort reports will be submitted at the end of each semester (fall, spring, summer).

3. Each employee receiving this report shall complete the actual percentage of effort for the given time period. S/he will sign the effort report to verify and obtain appropriate signatures.

5. Verification: *All employees must sign their own individual effort reports.* In addition, the PI must review and verify all effort reports associated with their sponsored project(s) using suitable means of verification that the reported work was performed. If the PI is the employee completing the effort report, a department chair must verify the report. If the PI is a department chair, the Associate Dean or Dean must verify the effort report.

6. Departments and/or PIs are required to return appropriately completed and signed effort reports to the Post-Awards Services Manager within 15 days of the end of the semester.

7. The Post-Award Services Manager will review the time and effort report, confirm appropriate verification, and keep the time and effort reports on file with the grant award and materials.