

Policy Statement

As a recipient of federal funding, Loyola University Chicago is required to comply with the Office of Management and Budget Circular Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance") as well as other federal requirements for certifying effort expended on sponsored awards. Loyola University Chicago requires all individuals who receive federal sponsored funding to comply with University policies and sponsoring agency regulations regarding the proposing, charging, and reporting of effort on those awards.

Reason For Policy

The Uniform Guidance Subpart E 200.430 contains the federal regulatory requirements for internal controls over certifying time expended on sponsored projects. The University's practice is to utilize an after-the-fact effort reporting system to certify that salaries charged, or cost shared to sponsored awards, are reasonable and consistent with the work performed. The actual effort expended on each project should be certified by a responsible person, usually the principal investigator, with suitable means of verification that the work was performed, at the end of specified reporting periods. The effort certification should be a reasonable estimate of how time was expended. Section 200.430 (i)(1)(x) states, "It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to Federal awards for IHEs [Institutions of Higher Education] a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected."

Effort Defined

Effort is defined as the amount of time spent on a specific project in relation to all work done for Loyola University, whether the sponsor pays the salary or not. This work may include but is not limited to research, teaching and administration services. Effort is expressed as a percentage of time that always equals 100. An individual's effort may be broken down into various accounts and jobs.

Effort Reporting Policy

Faculty spending effort on federally funded sponsored programs are required to report activities for which they are compensated each academic term (no less often than every six months) and document it on an effort certification report.

Mandatory and voluntarily committed cost sharing included on the proposal budget page or budget justification and any salary cap cost sharing are also documented.

The effort reporting reflects an after-the-fact-reporting for effort both paid and cost shared.

All Lakeside employees who work on sponsored program accounting account(s) must have effort certified at least 3 times a year, fall, spring and summer. Health Sciences Division employees may follow a different schedule for effort certification.

Effort Certification Policy

Procedure

Sponsored Program Accounting will send out to the Principal Investigator a report for Lakeside campuses that contains all employees who worked on their federally funded sponsored account(s). The Principal Investigator is responsible for reviewing and certifying the report. It must be returned to SPA, reviewed and signed, within two weeks (14 calendar days) of SPA's original sent date.

- The PI is looking for the accuracy of the effort for that given time period.
- The PI is only certifying the work that was done on the account they are responsible for.
- All accounts are listed because effort is 100% of work completed for Loyola University of Chicago.
- Total effort cannot exceed 100%.
- There should never be negative effort on the report.
- The percentage of effort for the SPA account(s) should be reflective of what is stated in the proposal submitted to the sponsor or award documents from the sponsor.

Time Period of Report	Send Out by SPA	Due Back to SPA	Second Request	Third Request
Fall 9/1/XX-12/31/XX	April 30 th	May 14 th	May 15 th	May 22 nd
Spring 1/1/XX-5/31/XX	September 30 th	October 14 th	October 15 th	October 22 nd
Summer 6/1/XX-8/31/XX	November 30 th	December 14 th	December 15 th	December 22 nd

Non-Compliance

If signed reports are not received within two weeks (14 calendar days) of SPA's original sent date, a follow up e-mail to the departmental contact(s) will be sent.

If after three weeks reports are still not received an e-mail will be sent to the department head.

At any time the University may undergo an audit to determine whether the effort certifications are accurate and complete. Severe penalties, cost disallowance, and reduced or terminated funding could result from inaccurate, incomplete, or untimely effort certifications. As a result, the institution must have zero tolerance for those investigators that fail to comply.