1.0 INTRODUCTION

The Uniform Guidance at 2 CFR 200 (UG) issued by the federal Office of Management and Budget, outlines the requirements for the documentation of faculty and staff effort associated with federally sponsored research projects and other activities. The University utilizes the ERS system to distribute and certify Effort Verification Reports (EVR) to document the effort related to salary the charged to sponsored activities at Saint Louis University.

2.0 PURPOSE

This policy is designed to ensure Saint Louis University’s compliance with federal regulations related to effort committed to and actually contributed to sponsored activity.

3.0 APPLICABILITY

This Policy applies to all salaried University employees who devote any portion of their work efforts to externally sponsored programs.

4.0 DEFINITIONS

See “Definitions Relating To Sponsored Projects At Saint Louis University.”

4.0 POLICY AND SCOPE
4.01 Proposing Effort and Requesting Salary Support

Levels of effort proposed in any sponsored project application should be consistent with the actual effort that each individual is expected to expend on the project during the relevant project period(s). The amount of salary support requested should normally be determined by multiplying the proposed level of effort by the individual’s Institutional Base Salary (IBS). Sponsor supported salary for proposed effort is normally requested in the budget and/or budget justification of the proposal, unless the type of submission/award would preclude such a request.

4.02 Proper and Timely Submission of Electronic Personnel Action Forms (E-PAF)

Committed effort should be entered into the Banner system via the E-PAF process prior to the start date of the sponsored award. The anticipated effort must be entered consistent with percent of salary distribution for the appropriate salary charges to be recorded against the award line. All funding lines (including non-grant) should equal 100%. A New E-PAF must be implemented when new awards are received or old awards expire. Failure to submit E-PAFs timely may lead to salary charges being deemed unallowable.

4.02 Salary Caps

Some sponsors, most notably NIH, impose limitations on the amount of IBS that may be used as a basis for charging salary to their projects. Where such limitations apply, the requested salary support is determined by multiplying the proposed level of effort by the maximum IBS allowed (e.g., the NIH salary cap) Departments are responsible for the completion and submission of a “Salary Cap Worksheet” for each subject whose salary is capped within an effort reporting cycle. Salary Cap Worksheets must be submitted in the effort reporting system in the appropriate effort period.

4.03 Proposing Graduate Student Stipends and Tuition Remission

If a proposal requests support for a graduate student in the form of a stipend the proportionate amount of tuition remission should also be requested from the sponsor. Depending on the percentage of the total stipend charged to a sponsored award, that same percentage is applied to 50% of the amount of tuition (the University supports the remaining 50% which is considered a form of cost sharing) and included in the budget to the sponsor.

4.04 Establishment of Salaries on Sponsored Programs Accounts

Salary distribution consistent with the projected effort should begin on sponsored projects accounts concurrently with actual project effort. It is each faculty member’s responsibility to be aware of his/her level of effort and to communicate any significant changes in level of effort (defined in
federal regulations as a change up or down of 25% or 3 calendar months), to his/her respective business office to ensure that salary distributions are reviewed and updated, if appropriate, on a timely basis.

4.05 Completion and Certification of Effort Reports

On a regular basis (every six months) an effort report form will be generated from the University’s effort reporting system for faculty, managerial and professional, clerical and technical staff, and post-doctoral associates whose compensation was charged in whole or in part to a sponsored project during the respective effort period. These effort report forms must be completed, certified, and submitted in accordance with this policy.

4.06 Manual Effort Reports

In certain situations, individuals may not receive an effort report generated from the University’s effort reporting system to support the effort devoted to a sponsored project, despite committed effort to that sponsored project. Such situations might include individuals who do not receive salary from SLU or individuals who receive salary from a sabbatical or leave of absence account. In such cases, the completion of a manual effort report form in accordance with the University’s policies is required. The individual named on the EVR is responsible to recognize that they have contributed effort on a sponsored activity, despite not receiving an electronic EVR when the EVR process commences. In such circumstances, the named individual must provide a manual EVR. New functionality in the electronic EVR system will allow these individuals to initiate a manual EVR in that system.

4.05 Minimum Proposed Effort

Faculty and other key personnel are expected to meet minimum mandatory effort requirements on sponsored projects. Acceptance of an award with specified minimum mandatory effort requirements, such as certain program project awards and center or career development awards, carries with it responsibility for meeting those requirements.

Faculty are expected to propose some level of activity (1% or more) or the minimum required by the program on proposals on which they are listed as Principal Investigator or key personnel unless specifically exempted by the sponsor. (Examples of exceptions to the minimum 1% effort requirement could possibly include doctoral dissertations, equipment and instrumentation grants, travel grants and conference awards.) If an award is accepted, the faculty member and key personnel are committed to providing this level of effort over the annual budget period of the award unless sponsor policies permit otherwise.

4.06 Maximum Allowed Sponsored Project Effort
Most faculty members are engaged in teaching, administrative and other duties in addition to their work on sponsored projects. Many activities have been deemed administrative in nature by Federal Regulators and, therefore, are not chargeable to sponsored awards. These activities include:

- Writing proposals
- Participating in departmental functions
- Participating in University Functions
- Participating on committees

This is not an exhaustive list, but an example of activities for which related effort would not be appropriate for sponsored awards.

Accordingly, unless the circumstances of a particular faculty member demonstrably warrant otherwise, 100% effort and salary of a faculty member should normally not be assigned to sponsored projects in a given effort period.

Proper documentation will be required to demonstrate that 100% effort is appropriate in those circumstances and should be attached to the related EVR in the system. The Office of Sponsored Programs should be contacted if there are questions regarding what is considered proper documentation.

4.07 Certifying all Effort

The completed effort report must reflect all activities for which compensation is paid by Saint Louis University. The total work effort expended must equal 100%.

4.08 Who can Certify Effort Reports?

Faculty members and staff are required to certify their own effort reports. If the subject who has expended effort on a sponsored project is not available, someone with sufficient knowledge about the activities contributed to the award may submit the certification. That knowledge must be sufficient to make the certification meaningful. The PI, for example, may certify the effort reports of the research staff working on his or her sponsored projects.

A Laboratory or Project Manager/Director, who has direct knowledge that the work was performed by the subject, may certify effort reports for research staff. This would be documented by determining work assignments and determining the awards to which the assigned work applies. Any covered individual may certify his/her own effort report. In doing so, the individual is expected to fully understand his/her funding and level of effort committed to each sponsored project.
Generally, a department administrator/business manager will not have sufficient direct knowledge of the effort contributed on an award and should not certify the effort of research staff.

4.09 Returning certified effort reports

Subjects must return the certified effort verification report no later than 30 calendar days after they have been distributed. Rejected or returned EVR’s must be certified and submitted to the EVR system within 15 days after it has been rejected or returned. OSPA will have 15 days after the EVR due date to review and finalize the EVR in the system.

4.10 Summer Effort/Salary for Faculty with 9-Month Academic Appointments

Faculty compensated for 9-month academic appointments are permitted to expend up to an additional 3.0 months of summer effort on one or more sponsored projects in the period beyond the academic year (i.e., during the summer research period) and earn additional salary for that effort, subject to sponsor policies and the approval of the department chair and dean/provost.

If a faculty member has administrative or other non-research responsibilities during the summer months and, thus, precluded from requesting 3.0 months of salary from those sponsored projects.

The provisions of this policy relating to the reporting and certification of effort apply fully to the reporting and certification of summer effort. Specifically, charging summer salary to one or more sponsored projects implies that at least a commensurate amount of effort has been expended on those projects during the summer effort period. Faculty who receive summer salary from sponsored projects must certify to the effort expended on those projects during the summer effort period. Effort expended during the academic year cannot be counted for this purpose.

Summer effort of faculty with a nine-month appointment must be supported by the equivalent salary charged to the sponsored award to which the effort was devoted.

4.11 Salary Reallocations & Recertification

Salary reallocations made as a result if the effort certification process must be made in accordance with the University Cost Transfer Policy.

Once certification of effort has been completed, only in certain circumstances will subsequent salary adjustments be permitted. If it is necessary to adjust the salary charges for a previously certified effort period, documentation must provide a detailed explanation of the need for the salary adjustment and subsequent recertification. This documentation must be approved by the Principal Investigator and be submitted to the Director – Sponsored Programs Administration for approval. A salary credit, which benefits the sponsor, will always be approved.

4.12 De minimis standards
Federal regulations recognize that the reported effort percent is a “reasonable estimate” and not exact. As such, effort must be reported and certified as accurately as the subject deems it to be based on their actual work activities. If adjustments are required during the effort reporting process, a subject’s effort must accurately reflect their activities but if the related labor reallocation would incur a change of less than 5% (in dollars), then the change would be deemed “de minimis” and the labor reallocation is not required.

5.0 PROCEDURES

5.1 Development of Grant Proposal Budgets

The proposal budget should include the entire cost of the project requested from the sponsor, as well as any project funding to be provided from other sources, including the University. A commitment to use University resources to pay any portion of the project cost must be identified as “cost sharing” on the University’s Transmittal Form for Externally Sponsored Proposals. A commitment of University resources for cost sharing on sponsored projects must:

1. have the written approval of the Department Chair and Dean, and
2. identify the fund and the account from which the University commitment will be funded.

Every attempt to accurately estimate the amount of direct research effort that key personnel are committing to the project should be made in the proposal budget, whether that effort is funded by the sponsor or by the University.

Since some proposals will not be funded, it is possible for individuals to reach total potential effort commitments of more than 100%, taking into consideration existing workloads and outstanding proposals. However, in preparing proposals, individuals must be aware of all their commitments and be prepared to address over-commitments immediately if a proposal is awarded.

Calculations for funding personnel salary on sponsored research agreements or university research projects must be based on the individual’s annual contractual salary rate during the period of performance, in accordance with the terms of appointment, including any supplements for department chairpersons or other administrative duties. Teaching and research in summer and evening programs are considered additional work carrying separate compensation, are not included in the annual contractual salary rate for purposes of this policy, and will be dealt with separately. All incentive compensation is excluded in calculating annual contractual salary for the purposes of this policy. Summer compensation should be charged to sponsored agreements in accordance with sponsoring agency guidelines. In no case may the amount charged for summer effort exceed 28% of the annual contractual salary.

The annual contractual salary for Saint Louis University Medical School faculty includes the
amount paid in accordance with their twelve-month appointment plus any supplements for department chairpersons or other administrative duties. Any incentive compensation paid under the University Medical Group or other departmental or faculty practice plan is not considered annual contractual salary for the purposes of this policy.

5.2 Accounting for Effort

In documenting and certifying effort on University activities, the following guidelines must be followed:

A. An individual’s effort distribution should reflect the percentage of actual time spent on various activities expressed as a percentage of total effort, not hours.

B. Effort on any particular project is measured as the percentage of the total obligation to the University. This obligation includes teaching, organized research, departmental research, administration, committee activities, etc.

C. Total effort may not exceed 100% and must only include activities for which the individual receives compensation from the University (including salary charged to sponsored agreements, but excluding incentive pay). An individual’s effort allocation should total to 100% and an individual’s salary allocation among the various activities should total to the individual’s base salary rate. If committed effort is expected to exceed 100%, the individual must IMMEDIATELY notify his/her chairperson, dean, and the Office of Sponsored Programs for a determination regarding the over-commitment’s allowability.

D. The amount of effort identified as organized research should include the portion of time the PI devotes to a project, even if he/she receives no salary support from external funds received in support of the project. In other words, effort identified as cost-sharing by the University on a sponsored agreement must be reported on the University’s Effort Reporting Form.

E. When an individual who receives salary from a sponsored program is scheduled to leave the University, an effort report must be completed at the time of separation.

F. Principal Investigators must ensure that all salaried faculty and staff who are paid from their projects complete effort reporting forms as required by this policy.

G. The Related Department Chair and Dean may be informed when any individual has a late effort report.

H. No one may certify 100% effort on sponsored activity unless documentation exists through the “Effort Verification Report” process that the proposed effort is appropriate.
6.0 SANCTIONS

Failure to follow the provisions of this effort reporting policy may subject the individuals and departments responsible for the violation(s) to administrative and/or disciplinary actions in accordance with University disciplinary procedures and the judgment of management. Specifically, and without limitation,

1. If effort reports are not completed and returned in a timely manner, salary costs associated with uncertified sponsored activity may be removed and charged to a departmental account.
2. The Office of Research Services may suspend submission of any new proposals on behalf of a noncompliant PI, or inclusion of a noncompliant researcher in proposals, until effort reports are up to date and properly completed and certified.
3. Certification of effort reports that are known to be materially inaccurate may expose the individual who completed the reports to personal disciplinary action.

APPROVAL SIGNATURES

This policy was developed by:
The Office of the Vice President for Research

This policy has been approved by:

Raymond C. Tait /s 07/01/2015
Signature Date

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