# Policy 3-020: Effort Reporting

# I. Purpose

Effort allocation and certification at the University is required by the Federal Government and other awarding agencies. It is the responsibility of the University, its departments and individual employees to ensure compliance with effort reporting requirements which includes the appropriate budgeting, charging and certification of effort.

# **II. Definitions**

Annualized Base Amount (ABA) is the maximum amount the employee would receive for the designated position if the employee were to work full-time (1.0FTE) for the full year (12months). Each employee can have only one ABA on the database at a time. ABA is called "Institutional Base Salary" (IBS) in the Uniform Guidance.

Certification is the act of attesting to the effort expended.

Personal Activity Report (PAR) is a periodic after-the-fact report of effort certified for exempt employees.

Principal Investigator is an individual designated by the grantee to direct the project or activity being supported by the grant or contract. The Principal Investigator is responsible and accountable to the grantee and agency for the proper conduct of the project or activity.

A "Responsible Official" may be a department chairperson, account executive, or supervisor, depending on the circumstances.

Time and Attendance System is a periodic after-the-fact report of effort certified for hourly employees.

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"Uniform Guidance" is the short name for Code of Federal Regulations Part 200 -Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

#### III. Policy

General

The Federal Government requires an effort reporting system. The University of Utah has established Personal Activity Reporting (PAR) for exempt employees and a time and attendance system for hourly employees as a means of satisfying these requirements.

A. Principal Investigator Responsibility:

The Principal Investigator (PI) has responsibility for the fiscal management of a sponsored award including associated effort reporting. Fiscal responsibility may be delegated but accountability remains with the PI.

B. Uniform Guidance Rules and Procedures:

Uniform Guidance §200.430 contains rules and Procedures for the substantiation and documentation of direct and indirect (F&A) payroll costs charged to federal grants and contracts. To comply with the requirements, the University has established a Personal Activity Report (PAR) system which consists of after-thefact effort reports for all exempt employees who expend effort on sponsored projects for which reimbursement is claimed from the grantor and, in addition, exempt employees paid from state appropriations in a department associated with grants and contracts. The PAR must be completed to show:

- 1. 100 percent of the effort expended in fulfilling the obligations of the employee's University appointment and,
- 2. The percentage distribution of payroll charges to each federal agreement.

A report form listing the major direct cost categories will be prepared for each individual required to report. The report will also list the employee's total payroll distribution in dollars and percentages. The employee will be asked to review the percentage payroll distribution to federal projects, make any necessary adjustments and then certify the report. The effort reporting system provides the principal means for certifying that the salaries and wages are consistent with the portion of effort committed to the grants and contracts. If the percentage of distribution is changed then appropriate earnings plus related benefits, taxes and indirect (F&A) costs will be adjusted

Total reported effort, which is the time required to complete all ABA University duties, must be reported in terms of 100% regardless of the number of hours spent in any given period. Adjustments should be made on the PAR for any variances of actual effort expended compared to the percentages reported. Dollars will then follow the certified percentages.

C. Cost Accounting Standards (CAS) for Educational Institutions requires:

CAS 9905.501 - Consistency in estimating, accumulating and reporting costs by educational institutions.

Effort should be budgeted (estimated) in proposals, charged, certified (accumulated) and reported consistently.

D. Effort Report Certification:

The effort report is to be certified by the employee or a responsible official who had responsibility for the employee during this quarter. It is preferred that the employee certify the employee's own PAR report.

E. Educating Faculty, Staff and Students Involved in Effort Reporting:

Deans and department chairs will inform their faculty, administrative staff and students of the university's policies and Procedures for effort reporting and monitor compliance. Guidelines are available on the University of Utah web site.

### IV. Rules, Procedures, Guidelines, Forms and other Related Resources

A. Rules

R3-020A, Personal Activity Report (PAR) System; Original

R3-020B, Personal Activity Report (PAR) System, Rules for; October 2008

B. Procedures

P3-020A, Personal Activity Report (PAR) System; Original

P3-020B, Personal Activity Report (PAR) System, Rules for; October 2008

- C. Guidelines [reserved]
- D. Forms [reserved]
- E. Other related resources [reserved]

# V. References

OMB Uniform Guidance (2 CFR 200)

# VI. Contacts

Acting as the Policy Owner, the <u>Office of the Director of Research Management &</u> <u>Compliance</u> is responsible for answering questions regarding the application of this policy. Acting as the Policy Officer, <u>the Office of the Vice President for Administrative</u> <u>Services</u> has the authority to allow exceptions to this policy.

# VII. History

Approved by Academic Senate February 5, 2007

Approved by Board of Trustees; February 12, 2007

Editorially revised changed April 7, 2022 to replace gender-specific pronouns.

Editorially changed to update Rules, Procedures, format, owner and officer; August 17, 2009.

Added Uniform Guidance; Editorial changes; June 30, 2016.