



University Compliance, Ethics, and Risk Office

UNIVERSITY OF CENTRAL FLORIDA

University of Central Florida Draft Policy Submission Cover Memo Form

Policy No. and Title:

Initiating Authority:

Initiating Authority Approval Date:

Date of Submission for Review:

Submitted by:

Department:

New Policy

Existing Policy (5-year Review)

Existing Policy (Out of Cycle
Review)

Summary of Revisions: (For a new policy, please provide a summary of the policy. For an existing policy, please provide a summary of the revisions made to the policy.)

Stakeholders included in the Review Process: (Provide a list of departments involved in the review/revision process.)

Stakeholder feedback must also be requested from the [Faculty Senate](#) and the [College Policy Liaisons](#). By checking the boxes below, you are confirming that feedback from these groups was requested, received, and considered in the draft policy.

College Policy Liaisons

Faculty Senate

Regulatory Requirements (if applicable): (Provide information on regulatory requirements pertaining to the policy, including specific statute or regulation number.)

Presenters: (Provide the name(s), position title(s), and email address(s) for all individuals who will be presenting the policy to the university's Policies and Procedures Committee.)



Draft - Time and Effort Certification on Sponsored Research, Training, and Service Awards

Policy Number	4-212.1
Responsible Authority	Associate Vice President Research Administration Director, Office of Compliance , Office of Research
Initiating Authority	Vice President of Research and Innovation
Effective Date	
Date of Origin	5/02/2023

APPLICABILITY/ACCOUNTABILITY

This policy applies to all university employees working on sponsored awards.

BACKGROUND INFORMATION

Institutions of Higher Education that receive federal funding must abide by Title 2 Code of Federal Regulations (2 CFR), § 200.430 (formerly Office of Management and Budget Circular A-21), which requires the university to have a system in place for certifying the allocation of time and effort associated with sponsored research, training, and service awards that:

- encompasses all employee activities (100% effort);
 - confirms expended payroll;
 - requires certification to be performed by an individual who has first-hand knowledge or used suitable means of verification to determine if the work was performed;
 - requires certification to be encompassed in the institution's official records; and
 - requires salary cost share to be captured in the university accounting system and included in the university's Research Base (Office of Management & Budget Memo M-01-06).
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POLICY STATEMENT

The university is required to comply with federal requirements for certifying time and effort expended on sponsored awards. In compliance with these standards, this policy establishes the

requirements of and procedures for recording, monitoring, and reporting time and effort certification.

The Office of Research manages the university's time and effort certification process; provides a certification reporting system to monitor, track and account for individuals' time and effort certification affirmations; and provides policies, procedures, and training on time and effort certification reporting. The implementation of this policy is further supported by guidelines found on the Office of Research website.

University employees are required to charge their time to sponsored awards based on the actual committed effort expended on all sponsored activities they perform. The expended time and effort must be allocated to the award where the work was performed and must be allowable per the award. In the instance of multiple awards, time and effort must be allocated to reflect the time spent on each funded project and other university assignments. Principal investigators are responsible for ensuring that the effort of their students and employees is assigned to the award where the work was performed and must ensure that inappropriate charges are not placed on an award.

Salary and wage cost assignments resulting from time and effort expended on a sponsored award(s) must reflect the employee's current institutional base salary (IBS). Employee cost assignments for work performed on a sponsored award during sabbatical leave or other leave of absence must be based on the employee's institutional base salary rate. Any changes to salary and wage cost assignments to a sponsored award must be identified and incorporated into the university's official records.

Academic and research unit leadership will ensure principal investigators and their employees certify their time and effort to a sponsored award or appropriate cost share grant account by the certification (semester) reporting period due date. The HR/Finance Business Center will assign contract and grant (C&G) position funding allocations to sponsored award accounts and assign education and general (E&G) position funding allocations to cost share grant accounts linked to a sponsored award(s) in accordance with the committed effort outlined in the proposed budget. The Finance Business Center will facilitate the periodic time and effort certification process to include monitor, track, and document salary assignments on sponsored awards and cost share grant accounts.

Failure to comply with time and effort certification and reporting requirements may result in suspension of charges on a current sponsored award or suspending the setup of a new sponsored award account. Failure to properly certify time and effort on a sponsored award(s) could result in financial penalties or other sanctions from sponsors, as well as put future awards at risk. Continued intentional non-compliance by an employee may result in employment discipline up to and including suspension or termination.

Payroll Certification

Employees must certify their time and effort to a sponsored award(s) or cost share grant account using the university's online Employee Compensation Compliance (ECC) system. Employee time and effort may be certified by the principal investigator or a responsible person with first-hand knowledge or suitable means of verification that the work was performed. When an employee is unable to certify their time and effort in a timely manner for emergency,

employee leave, or unforeseen circumstances the principal investigator or a responsible person with first-hand knowledge or suitable means of verification may certify the work was performed. Employee time and effort charged to a sponsored award and/or cost share grant account must be reviewed and affirmed by the principal investigator. Employee salary assignments to a sponsored award(s) and/or cost share grant account must be entered for the period in which the sponsored activity was conducted.

Incomplete or late certifications will result in the transfer of salary cost assignments to a non-sponsored department account.

Tuition Reconciliation

The percentage of a student's tuition charge assigned to a sponsored award must reconcile to the percentage of a student's salary or wage cost assigned to the same sponsored award.

Minimum Level of Committed Effort

Principal investigators and key employees must devote a reasonable amount of committed effort but no less than one percent (1.0%) of their full-time equivalency (F.T.E.) to the award and/or to a cost share grant account unless otherwise excluded by the sponsor and approved by the university.

Committed Effort Exclusions

The minimum level of committed effort is exempt when the sponsor's policies, and/or award terms and conditions do not allow a minimum level of committed effort. The following award types may be exempt from a minimum level of committed effort when specified by the sponsor:

- Equipment and instrumentation grants,
- Mentor effort on doctoral dissertation, fellowship, scholarship awards, and training grants,
- Specific purpose awards such as travel grants, outreach programs, workshops, and conference support grants.
- [Student academic fellowships, scholarships, training grants, and/or student support grants in which the student is named by the sponsor as a PI, co-PI, and/or key employee, and for which the sponsor does not require a stipulated time and effort commitment.](#)

Committed (Mandatory) and Volunteer Committed Cost Share

Principal investigators and key personnel must disclose in the sponsored proposal the salary value and percent of F.T.E. for mandatory and voluntary committed cost share.

Time and effort assignments to a cost share grant account must be documented in the university Human Capital Management (HCM) system and expensed through the university financial system to comply with the following Federal regulations:

- Properly account for the employees 1.0 F.T.E. assignment (Uniform Guidance, 2 CFR §200.430 (i)(1)(iii) & (vii),
- Properly account for the amount of cost share expended (Uniform Guidance, 2 CFR §200.306 and §200.430 (i)(1)(i),
- Properly track the cost share in the university's Research Base (Uniform Guidance (2 CFR §200.306 (a)) and Office of Management & Budget Memorandum (OMB – M-01-06).

Training

Employees working on sponsored awards must complete time and effort certification training prior to the project account set-up and repeat the training no less than once every four (4) years.

Time and Effort Certification During Sabbatical Leave

Faculty cost assignments to a sponsored award during sabbatical leave must be based on the employee's institutional base salary rate. Faculty must certify their sabbatical time and effort assignments to a sponsored award(s) through the ECC system.

DEFINITIONS

Central Office Administration. Office of Research

Committed (Mandatory) Salary Cost Share. Payroll (salary) funded by a university department fund to meet sponsor required cost share (salary commitment in the project budget).

Committed Effort. The amount of effort expressed as salary dollars or percent of full-time equivalency listed in the sponsored proposal budget and/or budget narrative to perform the sponsored research, service, or training activity.

Employee. Any individual employed by the university to include the following full-time and part-time position types:

Faculty (includes Adjunct faculty)
 Administrative & Professional (A&P)
 University Support Personnel System (USPS)
 Post Doctoral Personnel
 Other Personal Services (OPS) appointments to include:
 Graduate Research Assistants
 Graduate Teaching Assistants
 Professional Research Assistants

Full Time Equivalence (F.T.E.). Employee work assignments are based on a minimum 40-hour workweek and encompass all hours spent on university activities. The time spent on university activities may well surpass the minimum hours and must be used when determining F.T.E. For example, a professor may spend on average 60 hours per week on university activities and

therefore, 60 hours would represent that professor's F.T.E. F.T.E. is allotted to employee assigned duties in proportion to each duty as to reach 1.0 F.T.E.

Institutional Base Salary (IBS). The annual compensation paid by the university to an employee (academic/research/service) for work performed by the employee. In no event will charges to a sponsored award(s), irrespective of the basis of computation, exceed the proportionate share of the IBS for that period. IBS excludes any income that an employee earns outside of their university F.T.E. assignment.

Time and Effort Certification. Employee certification of their sponsored and non-sponsored time and effort expended and the resulting payroll assignment to a sponsored award by using the Employee Compensation Compliance (ECC) system.

Personnel Costing Allocation. A Workday online form administered by Human Resources that assigns the employee's salary and wage rate and period of time to a department and/or a sponsored award account.

Principal Investigator. The faculty member, postdoctoral associate, graduate student, medical student, or other suitably trained individual responsible for the design, conduct and reporting of a particular research/service/training award. Any given award may have additional co-or sub-investigators. Undergraduate students can serve as a principal investigator under a fellowship authorized by the sponsoring agency.

Research Base. Modified Total Direct Costs (MTDC) expended to conduct sponsored research/service/training consisting of salaries and wages, fringe benefits, materials and supplies, services, travel and subgrants and subcontracts up to the first \$25,000 of each subaward (regardless of the period covered by the subaward).

Salary & Wage Cost Assignments. The amount (value) of the employee's salary or wages (payroll) assigned to a sponsored award(s) and/or cost share grant account in the university's official records during a set period of time.

Sponsored Award (Research/Service/Training). All organized research and development, service, and training activities, sponsored by federal and non-federal agencies and organizations, including university sponsored research that is accounted for and separately budgeted. This includes research executed by university employees using any university space, facilities, materials, equipment, or property that is financed by contract payments, grants, or gifts from any source (University Regulation UCF-2.027). Sponsored Research supports research and development, but it also includes instruction, training, professional development, curriculum development, community and public service projects, and commercialization. Sponsored Research funding instruments also includes cooperative agreement, consortium agreement, and donations under which the university agrees to perform a certain scope of work for an external sponsor.

Unit Leadership. College dean's, directors and chairs, and research center or institute director's and or their delegated officials. Includes Finance and Human Resource Business Center leadership.

Voluntary Committed Salary Cost Share. Payroll (salary) funded by the university that is committed (pledged) on a voluntary basis in the sponsored proposal and/or sponsored award.

Includes principal investigator(s) and key personnel named in the sponsored proposal and/or sponsored award.

Voluntary Uncommitted Salary Cost Share. Payroll (salary) funded by the university that is not committed (pledged) in the sponsored proposal budget and/or budget narrative.

PROCEDURES

Sponsored proposals and awards must specify principal investigator(s) and key personnel committed effort and F.T.E. in the Huron electronic research suite, and indicate whether the salary will be charged directly to the award or to a university cost share grant account.

Employee salary and wage cost assignments based on time and effort, to include committed and voluntary committed cost share assignments, in support of work conducted on a sponsored award must be entered into the university official records by using a Workday personnel costing allocation form, or equivalent university procedure. Employee salary and wage cost assignments must reflect the percentage of the employee's F.T.E. (total university activity) annotated in the original proposal or a changed F.T.E. as required by the employee or sponsor. The employee's F.T.E. percentage (effort) on a sponsored award must support their distribution of salary or wages among the employee's total assigned activities not to exceed one hundred percent (100%) F.T.E. Salary or wage cost assignments for work performed on sponsored awards by employees having a part-time appointment will be determined at a rate not in excess of the amount paid for their part-time assignment.

Principal investigators are responsible for assigning their employees' time and effort to a sponsored award, monitoring their employees' time and effort assignments to a sponsored award, tracking changes to their employees' time and effort assignments, and for ensuring their employees complete and affirm their time and effort in the university's payroll certification reporting system (ECC).

F.T.E. changes to the employee's sponsored award(s) work activity must be reflected on a personnel cost allocation form (or equivalent university process) prior to the change or on a Salary Cost Transfer eForm within ninety (90) days from the date of the effective change. The principal investigator and/or employee must affirm their total F.T.E. payroll cost assignment for each sponsored project on an academic semester basis.

RELATED INFORMATION or DOCUMENTS

[Code of Federal Regulations Title 2, Part 200](#)

[Employee Compensation Compliance Website](#)

[Office of Research Payroll Certification Guidelines](#)

[UCF Effort Reporting FAQs](#)

CONTACTS

Office of Research, ~~Office of Compliance~~ [AVP Research Administration](#), Payroll Certification Office – 407-823-3778