Electronic Certification of Effort and Reporting Tool

Presented by Donna Smith and OPAFS
What Do Federal Sponsors & Regulations Require?

- All effort expended on federal sponsored projects (or Federal Flow-through) must be certified timely (per OMB Circular A-21).

- Strict adherence to terms and conditions of federal contracts and grants.
Why Do Audits Focus On Effort Certification?

- Salaries and wages typically comprise 2/3 of the total expenditures charged to federal sponsored projects.

- FY10 Federal expenditures for UCSD were $684M.
What is Effort?

A person’s "effort" is all UCSD work performed over a defined period of time including research, teaching, service, clinical work, and administrative duties.
What is Effort Reporting?

- Effort reporting is the mandated method of certifying to sponsored programs granting agencies that the effort required as a condition of the award was actually completed.
Who certifies?

- PI and other faculty are required to certify their own effort since they are in the best position to understand how they spent their time in support of the various activities in which they are engaged.

- Staff employees must be certified by “... the employee, PI, or responsible official with suitable means of verification (knowledge) that the work was performed.”
Impact of Non Compliance?

- **Yale University**
  
  $7.6$ Million Settlement – December 2008
  
  - PI failed to provide the $25\%$ level of effort proposed and did not submit effort reports for lab technician.

- **Weill Medical College of Cornell Univ**
  
  $2.6$ Million False Claims Act – March 2009
  
  - Investigator allegedly failed to disclose full extent of active research projects, exceeded $100\%$ of avail time.

- **Saint Louis University**
  
  $1$ Million Settlement – July 2008
  
  - Former dean filed a “Whistleblower” lawsuit alleging overstatement of effort spent by faculty members, resulting in overpayment of supplemental income.
• Weaknesses Identified
  - Timeliness of Certifications
  - Accuracy of Certifications
  - Labor Cost Transfers

• Reports are published at:  http://www.nsf.gov/oig/auditpubs.jsp
What is ECERT?

- **Electronic Certification of Effort and Reporting Tool**
- Electronic System tool used to Certify Effort Reports
- UC developed an efficient system for PIs and Fund Managers to replace paper PARs.
Benefits of an Electronic System

- Accessible via any Internet Connection
- Eliminated Loss of Paper Effort Reports
- System Became “Office of Record”
- More Accurate Effort Report Calculations
- Effort Report Status Changes When a PET is Processed
- Provides Ability to Drill Down to DOPE Data
- Tracks Timeliness of Completion
How often do we do this?

<table>
<thead>
<tr>
<th>MONTHS</th>
<th>REPORTS AVAILABLE</th>
<th>REPORTS DUE</th>
</tr>
</thead>
<tbody>
<tr>
<td>January, February, March</td>
<td>May 15</td>
<td>July 29</td>
</tr>
<tr>
<td>April, May, June</td>
<td>August 15</td>
<td>October 28</td>
</tr>
<tr>
<td>July, August, September</td>
<td>November 15</td>
<td>January 28</td>
</tr>
<tr>
<td>October, November, December</td>
<td>February 15</td>
<td>April 30</td>
</tr>
</tbody>
</table>

• Reports must be certified within 120 days after the end of each quarter.
• Reports will be made available after one ledger close following the end of each quarter.
• Status reports will be sent to your departmental manager twice each quarter.
## Roles and Responsibilities

<table>
<thead>
<tr>
<th>OPAFS</th>
<th>ECERT COORDINATOR / FUND MANAGER</th>
<th>PI / CERTIFIER</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facilitates Effort Reporting</td>
<td>Reviews the Effort Reports and makes any needed adjustments (EPET adjustment, etc.)</td>
<td>Logs into the ECERT System.</td>
</tr>
<tr>
<td>Best Practices &amp; Process</td>
<td></td>
<td></td>
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<tr>
<td>Improvements</td>
<td></td>
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</tr>
<tr>
<td>Sends reminders</td>
<td>If needed - checks the <em>Multiple Certifier</em> box.</td>
<td>Reviews the % of effort charged matches actual effort on each project and certifies the effort reports.</td>
</tr>
<tr>
<td>Monitors Effort Reporting</td>
<td>Emails PI to notify them that the Effort Reports are ready for certification.</td>
<td>Consults with your Fund Managers if any adjustments or corrections are needed.</td>
</tr>
<tr>
<td>Compliance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manages the ECERT System</td>
<td>Ensures certifications are completed timely.</td>
<td>Meets the deadline for compliance.</td>
</tr>
</tbody>
</table>
ECERT Coordinator / Fund Manager’s Responsibility

- Receives an email notification from OPAFS that Effort Reports are ready for review.
- Reviews the Effort Reports and makes any needed adjustments (EPET adjustment, etc.)
- If needed checks the *Multiple Certifier* box.
- Emails PI to notify them that the Effort Reports are ready for certification.
- PIs have been advised to consult with their Fund Managers before making any adjustments.
- Ensures that certifications are completed timely.
PI’s Responsibility

- Logs into the ECERT System.
- Reviews the % of effort charged matches actual effort on each project and certify the effort reports.
- Please consult with your Fund Managers if any adjustments are needed.
- Meets the deadline for compliance.
What does ECERT look like?

UNIVERSITY of CALIFORNIA

Effort Reporting System

Editing search: <New Search>

Display Reports for:

People  Departments  Indexes  Awards  IFOP

Filter by:

- Name/Employee ID contains or equals

- Person's Home Department name or number contains or equals

- Person is Principal Investigator (PI)

Filtered results list:

AAGARD, ANNETTE M (000)  
EXTENSION - 000500

AAMODT, KJELD (000)  
DIVISION OF BIOLOGICAL SCI. - 000203

Search collection:

Click an item to remove it from the collection:

-  

0 items in collection.

Update Filter  Reset Filter  

SAVE  SAVE AS...  VIEW
Tools for Success

• Quick Reference Guides and Job Aids:
  http://blink.ucsd.edu/finance/awards/effort/ECERT/aids.html

• Frequently Asked Questions:
  http://blink.ucsd.edu/finance/awards/effort/ECERT/FAQ.html

• Additional Information:
  http://blink.ucsd.edu/finance/awards/effort/ECERT/overview.html

• Trouble with Single Sign On? Contact:
  acthelp@ucsd.edu

• Any ECERT related questions should be emailed to:
  ecerthelpdesk@ucsd.edu
Questions?

- Contact your ECERT Coordinator/Fund Manager
- Policies:
  - Accounting Manual P-196-13
  - Contracts & Grants Manual – 7-330 EFFORT CERTIFICATION AND REPORTING SYSTEM *
    http://www.ucop.edu/raohome/cgmanual/chap07.html#effort
- Search for ECERT in Blink
- Any ECERT related questions should be emailed to: ecerthelpdesk@ucsd.edu
Next Quarter Topics

• EPET’s & Effort Reporting Accuracy

• Special Situations Often Encountered
  - VMRF and Personnel Agreements
  - NIH Salary Cap
  - K Awards
  - MOUs - Joint VA/UC Appointments