

DRAFT Effort Reporting and Certification Policy

WHY THE NEW POLICY?

1. To ensure compliance with OMB Circular A-21 (2 CFR Part 220)
2. In response to an Internal Audit Recommendation (2009)
3. As a result of some very high profile audits by the Office of Inspector General (OIG)

It is important to note that the highest risk for the university is in B-base faculty salaries and B-base summer salary, and for those persons paid salary from federal sourced funds.

WHAT DOES THE POLICY ADDRESS?

The policy will include a set of comprehensive procedures (“requirements”). The requirements which further explain and generally support the policy, specifically address:

- Effort reporting and certification (the EASE form and process, including timeliness)
- Cost Sharing
- Changes in Effort and/or Funding Source
- B-Base Faculty Summer Salary
- Roles and Responsibilities
- Training on Effort Reporting and Certification
- Consequences

WHAT ARE THE NEXT STEPS?

Vetting on campus by the Faculty Senate, P&S Council, Deans and Department Chairs, EASE Coordinators, and Grant Coordinators; and a public open comment period

The goal is to have the policy implemented in January 2011

Required training for PIs with federal awards. Others, such as EASE coordinators, may attend training.