



Campus Administrative Policy

Policy Title: Time and Effort Reporting on Sponsored Projects 4-21

Policy Number: 2031 Functional Area: Finance

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Approved by: Vice Chancellor for Research

Prepared by: Director of the Office of Grants and Contracts
Reviewing Office: Office of Grants and Contracts
Responsible Officer: Office of Grants and Contracts

Applies to: CU Denver Campus
CU Anschutz Medical Campus

A. INTRODUCTION

The University of Colorado Denver | Anschutz Medical Campus (“the university”) receives a significant amount of funding for sponsored projects from the Federal government. Receipt of federal funding for sponsored research is conditioned on the maintenance of an accurate system for reporting time and effort on sponsored projects. To meet this requirement, it is campus policy to have timely reporting of time and effort charged to sponsored research projects. This includes projects sponsored by Federal and state agencies, private foundations, industry sponsors and other organizations that provide funding for research, training and public service activities.

B. DEFINITIONS

1. Cost Sharing is the portion of a sponsored project that is not supported by the sponsor. There are three types of cost share including, (1) mandatory; (2) obligatory; and (3) voluntary.
2. Effort is the work expended on a grant or contract related activity. Effort can either be paid by the sponsor or paid by the University (this is considered “cost-sharing”). Effort is not based on a forty (40) hour work week but as the percentage of the total

hours spent on work related duties.

3. Electronic Personnel Effort Reporting (ePER) System is the electronic system used by University personnel to report effort on sponsored projects
4. Mandatory Cost Sharing is cost sharing that is contractually required by the sponsoring agency. It is required by a sponsor as a condition of an award and usually refers to the overall percentage of total costs to be contributed. When cost sharing is required, it will be stated in the award notice. The most common example of mandatory cost sharing is the commitment of time and effort by university faculty or staff that is required by the sponsoring agency as a condition of getting the award.
5. Obligatory Cost Sharing is cost sharing that a university representative offers to perform as a part of the application/proposal, although it is not required as a condition of the award. Obligatory cost sharing is a commitment and needs to be documented. Obligatory cost sharing is also known as committed cost sharing.
6. Sponsored Projects are research, instructional, or public service activities that are related to the mission of the university and sponsored by external agencies or entities. If an award meets at least one of the following criteria, it is likely a Sponsored Project. However, the existence of any one of the criteria may not be determinative.
 - a. The award is a grant or contract from a governmental entity, unless exempted under OMB Circular A-21.
 - b. The proposal responds to a Request for Application (RFA), Request or Proposal (RFP), or other formal solicitation, and the project is initiated by notice of award. Certain RFPs issued by private charitable foundations may not qualify as a Sponsored Project.
 - c. The award includes terms that bind the university to a list of scholarly or scientific inquiry.
 - d. The Statement of Work specifies programmatic objectives mutually agreed upon by the university and the sponsor, which are to be accomplished within a specific period of time or within a detailed budget framework.
 - e. The sponsor is entitled to receive the following types of deliverables: a detailed technical report of research results, milestone reports, or a required report of allowable expenditures. Certain reporting requirements of private charitable foundations that are stewardship- or accountability-oriented may not qualify as Sponsored Projects.
 - f. The award requires separate accounting procedures and detailed financial reports.
 - g. The sponsor requires the return of unexpended funds or only reimburses for incurred costs (expenditure-driven).
 - h. The award provides for compliance audits by or on behalf of the sponsor, which may or may not include a financial audit.
 - i. The award is for a project requiring compliance oversight including, but not limited to: human subjects, animal use, biohazards, or bio-safety.

- j. The award terms include publication or data restrictions or monitoring.
 - k. The sponsor requests intellectual property rights or controls the disposition of capital equipment.
 - l. The award is by a sponsor who has licensing rights to inventions from the same lab/researcher benefiting from the award.
 - m. The sponsor designates a sponsor employee (agent) as project technical monitor (as opposed to designating a contact person to improve communications).
 - n. The award is for a sub-award project under a federal award.
 - o. The award requires a matching or cost sharing commitment on the part of the university.
 - p. The award generates program income to a federal award.
 - q. The award from the sponsor is for membership fees to centers and affiliate programs. The university may receive membership fees for its centers and affiliate programs, as characterized by any one of the following examples:
 - 1) The member agreement imparts "Center Member" status to the sponsor.
 - 2) The member receives the right to exert any type of control over the operation of the institute, center, or program.
 - 3) The member receives special or discounted access to laboratories or other university facilities for its use.
 - 4) The member receives patent, licensing rights, or other intellectual property rights provisions benefiting the sponsor.
7. Voluntary Cost Sharing is cost sharing that is provided in excess of obligatory or mandatory cost sharing requirements. It is a commitment of time or other spending in support of a sponsored program above and beyond that required by the award or agreed to in order to obtain the award. Examples of voluntary cost sharing include (1) additional time spent on a program/project that is 5% or more above that which is budgeted or required by the award, (2) laboratory supplies or travel expenditure paid by a source other than the sponsored program/project, and (3) cost overruns on a program/project. As voluntary cost sharing is not committed/obligatory cost sharing, the University is not required to officially track the cost sharing.

D. POLICY STATEMENT

1. Applicability

All university personnel paid from sponsored projects are required to certify the percentage of time and effort that is charged to a sponsored project. Certification is required to provide assurance to the sponsor that salary paid by the grant equals the effort/work provided to the grant. Personnel are required to certify each semester (fall, spring and summer). The certification is done via the Electronic Personnel Effort Reporting (ePER) system. Semester certification covers the following months:

- a. Fall: September-December
- b. Spring: January-May
- c. Summer: June-August

Effort includes all work that is done as a University employee, and is not necessarily based on a 40 hour week. Effort is based on the portion of total work expended on a specific project during a particular time period, regardless of the number of hours worked.

Average Weekly project hours = % of project effort: Average Weekly total CU hours

Example: If a PI worked 44 hours a week on a project, and didn't do any other university work, this would result in having 100% effort contributed to the project (44 project hours per week for 44 hours of CU work). It's not 110% (44 project hours of 40 hours).

Conversely, if a PI worked 30 hours a week at the university, and 20 of the hours were devoted to the project, the PI would have contributed 67% (20 hours of 30 hours) to the project, not 50% (20 hours of 40).

2. **Timing**

University personnel are required to certify ePERs within 120 days of the ePER creation. Personnel required to certify an ePER will receive an e-mail at the end of the relevant semester with instruction to certify the ePER. Personnel who do not certify an ePER will receive routing e-mail reminders until the ePER is certified.

Outstanding reports are delivered directly to the PI and Org Manager by CU System Controller Office.

3. **Certification Process for Current Employees**

The university utilizes an electronic Personnel Effort Reporting (ePER) system for certification of time and effort. The ePER system is a web-based system which is accessible through the myCU portal

The process to follow for certifying ePERs is the, "Step-by-Step Guide: Certifying Electronic Personnel Effort".

4. **Certification Process for Terminated Employees**

Time and effort reports for university employees who are terminated in the Human Resource System (HRMS) must also be completed. Designated individuals at the department level have the ability to view the ePER of certain employees as well as the ability to certify ePERs for employees who did not certify prior to separation from the university.

The process to follow for certifying ePERs of terminated employees is the, "Step-by-Step Guide: Certifying ePERs for Terminated Employees".

5. **Cost Share**

The university is required to track and report any mandatory or committed cost

sharing. The ePER allows for reporting of mandatory or committed cost sharing. For further information on cost share, see Definitions above, and Fiscal Policy 4-8, Cost Sharing.

6. **Employees working for the Veterans Administration (VA)**
Effort for employees of the VA should not be tracked on the University ePER system. Employees of the university should certify the ePER for 100% of the effort that is provided at the University, based on the number of hours worked at the University.

Notes

1. Dates of official enactment and amendments:
May 1, 2009: Adopted by the Vice Chancellor for Research
March 26, 2019: Formatting Updated
2. History:
March 26, 2019: Modified to reflect a Campus-wide effort to recast and revitalize Campus policy sites into a standardized and more coherent set of chaptered policy statements organized around the several operational divisions of the university. Article links, University branding, and formatting updated by the Provost's office.
3. Initial Policy Effective Date: May 1, 2009
4. Cross References/Appendix:
 - Office of Management and Budget Circular A-21, Cost Principles for Educational Institutions.
 - [University of Colorado, Administrative Policy Statement 1005, Sponsored Project Revenues](#)