PROCEDURE NUMBER: FINA 3.12 Procedure

SECTION: Administration and Finance

SUBJECT: Time and Effort Reporting

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Procedure for: All Campuses

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Issued by: Administration and Finance – Controller's Office

Procedure

The University Administration and Finance Division, Controller's Office, will ensure compliance with University Policy FINA 3.12. This procedure is applicable to campuses, units, departments, centers, Principal Investigators (PIs), and administrators at the University who are involved with the initiation, administration, and conduct of sponsored awards. The purpose of this procedure is to supplement the associated policy by providing additional detail and guidance on the time and effort reporting process.

Time and effort reports will automatically be generated for any employee who received earnings funded by a sponsored award, including those with salaries and wages charged directly to the award and/or indirectly to the award as cost share. Each time and effort reporting cycle covers a six-month period: (1) January – June and (2) July – December.

A. Central Administration Responsibilities

The Controller's Office Compliance Team will generate time and effort reports twice a year using processes within the <u>PeopleSoft HCM system</u>, which produces electronic forms. The reports will be generated approximately 60 days after the reporting period ends. The purpose of this timeframe is to provide departments with ample opportunity to identify and correct any inaccuracies and mitigate the recertification required throughout the process.

Once reports are generated, Business Managers will receive an email notification through the BIZMANAGER <u>listserv</u> along with a detailed memo containing pertinent information and reminders regarding due dates and available resources.

The Compliance Team is responsible for performing pre-issuance verification of the time and effort report generation process to ensure reports are generated timely and accurately reflect

earnings for the employee. The Compliance Team is also responsible for providing support to Business Managers as needed as well as regular status updates throughout the reporting cycle. Compliance Team provides annual training and updates to end users.

For assistance, the Compliance Team can be contacted through the central mailbox at timeandeffort@sc.edu, which is monitored regularly.

B. Business Manager Responsibilities

Effort reports are assigned based on the employee's primary home department.

Business Managers are responsible for:

- Attending time and effort training to stay up to date on updates and requirements.
- Validating and releasing the effort reports for the employees within their purview for accuracy. The HCM Distribution Tool located on the <u>Finance Intranet</u> should be used to validate the accuracy of each report. Once validated, the reports should be released to the approval workflow through completion of an electronic confirmation and submission of the effort report.
- Coordinating with other colleges and departments as needed to verify the accuracy of each report prior to releasing it for approval.
- Coordinating with pending approvers (e.g., employees, PIs, and supervisors) until all applicable approvals are completed.
- Serving as an intermediary between approvers and the Compliance Team and Grants and Funds Management (GFM) regarding troubleshooting and corrections to reports.
- Submitting any needed corrections, along with required supporting documentation, to the Retro JE Team, in accordance with FINA 3.35 Cost Transfers.
- Ensuring all effort reports within their purview are fully approved and executed within the system in a timely manner, which should include regular monitoring of completion status and follow up with approvers as needed.

C. Workflow and eForm Status

Once validated and released by Business Managers, each effort report will flow through an electronic workflow process in the following sequence below. If an approver is no longer with the University and inactive in the system, the workflow for automatically route to the next approver.

Employee \rightarrow PI(s) \rightarrow Supervisor

The following statuses apply to the effort reports:

Status	Description	Responsible Party
Saved	Report still requires validation and release; no action has been taken, approvers have not received the report	Business Manager

Pending	Report is awaiting approval	Employee, PI, or
		Supervisor
On Hold	This option should not be used by any party – it results in the report	
	getting "stuck" in the workflow.	
Recycled	Issues/errors identified during the certification process that require correction; report will automatically update once corrections post and will need to be revalidated/re-released after resolution	Business Manager
Executed	Report is fully certified and approved	N/A – no further
		action is required

D. Employee Responsibilities

Employees are required to:

- Review their effort report for accuracy in a timely manner.
- Electronically certify all lines on their effort report and provide a certification statement attesting to its reasonableness.
- Correspond with Business Managers regarding questions and issues.
- Promptly communicate and coordinate with Business Managers regarding any identified inaccuracies and needed corrections.

E. Principal Investigator (PI) Responsibilities

PIs are required to:

- Review the effort report of any employee who provided effort to their project(s) for accuracy in a timely manner.
- Electronically certify the lines on the effort report associated with their project(s) and provide a certification statement attesting to its reasonableness. PIs will only have access to the lines associated with their project(s).
- Correspond with Business Managers regarding questions and issues.
- Promptly communicate and coordinate with Business Managers regarding any identified inaccuracies and needed corrections.

F. Supervisor Responsibilities

Effort reports will route to an employee's <u>current</u> supervisor (as of report generation) for final approval.

Supervisors are required to:

- Review the effort report of any applicable supervisee in a timely manner.
- Electronically certify any remaining lines on the effort report and provide a certification statement attesting to its reasonableness. Supervisors will have access to

all lines – if an employee is longer with the University and/or unavailable to certify their own report, the supervisor must ensure all lines are certified.

- Correspond with Business Managers regarding questions and issues.
- Promptly communicate and coordinate with Business Managers regarding any identified inaccuracies and needed corrections.

G. Salary Cap Example

The accompanying policy specifies, "Any salary attributable to a sponsored award above the salary cap must be recorded as cost share to properly capture and track total expended effort..." The <u>Salary Cap Calculation Template</u> can be used to help with salary distribution allocations related to salary caps.

See below for an example of how the salary cap impacts effort reporting:

Dr. Greyhound's annual institutional base salary is \$300,000. He has committed (and expended) 10% effort on a National Institute of Health (NIH) grant that has an imposed salary cap of \$225,700. Due to the NIH limit, the maximum that can be directly charged to this sponsored award is \$22,570 (\$225,700 limit x 10% effort).

In order to properly record the 10% total effort committed (and expended) on the NIH award, the remainder must be recorded as cost share on the award:

10% Total Effort (based on salary):	\$30,000	(\$300,000 x 10%)
Directly Charged to NIH Award:	\$22,570	(\$225,700 x 10%)
Cost Shared to NIH Award:	\$7,430	(\$30,000 - \$22,570)

When calculated and recorded appropriately in this manner, Dr. Greyhound's effort report will capture actual institutional base salary (<u>not capped salary</u>), with the NIH award appearing as follows:

Amount	Percent of Pay / Computed Effort	Project	Cost Share
22,570	7.52%	10001234 – Project ABC	
7,430	2.48%		10001234 – Project ABC
30,000	10.00%		

Dr. Greyhound's other activities, including teaching, administration, and research on other sponsored awards will make up the remaining 90% of his effort report.

H. Corrections

When corrections result in the need to reduce the amount charged to a sponsored award, such adjustments are mandatory and always permissible. Correction resulting in increasing the

amount charged to a sponsored award must adhere to **FINA 3.35 – Cost Transfers** and must be reviewed and approved by GFM.

As specified in the accompanying policy, "every effort must be made to ensure reports are accurate before certification occurs. Approvers, including employees, PIs, and supervisors, are prohibited from knowingly or negligently certifying an inaccurate effort report." As such, it is not appropriate for corrections to be requested after an effort report has been executed. Doing so is an indication of poor internal controls and monitoring practices and increases the University's risk exposure.

When a correction is posted for an already-executed effort report, recertification of a new effort report is required by all parties. Appropriate steps must be taken to mitigate these occurrences. When an executed effort report is impacted, departments are responsible for providing a signed letter from the Dean (or respective Director for support units) to support the correction request that attests to (1) acknowledgment of the issue and untimely transfer request; and (2) a corrective action plan to mitigate future occurrences. These corrections will also require additional approval from the University Controller. GFM will notify the Compliance Team of any correction requests received that impact an executed effort report.

I. Timeliness Requirements

Effort reports should be executed and fully certified and approved within 30 days of issuance. Any salary/effort not certified within 60 days of issuance is subject to be moved to departmental funds by central administration. The Controller's Office Compliance Team will monitor report completion and enforce this procedure to ensure compliance and manage the University's risk exposure.

J. Resources and Forms

Resources, trainings, and guides can be found on the Controller's Office website under the following sections:

- Compliance and Tax Management → Compliance Management
- Resource and Training Toolbox → Business Manager, Grant Administration, Principal Investigator, Forms

History of Revisions:

DATE OF REVISION	REASON FOR REVISION
July 1, 2022	New Procedure
July 1, 2024	Added Roles and Responsibilities sections
October1, 2025	Added Salary Cap Example and History of Revisions section