

Mount Holyoke Effort Policy

The federal government, through the Office of Management and Budget (OMB) Circular A-21, Section J.10, requires effort certification on federally-sponsored activity. In order to receive and maintain eligibility for funding, sponsoring agencies require accurate and reasonable documentation to support that labor costs charged to sponsored accounting units are consistent with the effort expended. This certification is reviewed to verify that the percentage of effort placed on a federal award is not less than the percentage of salary charged to the accounting unit. This Effort Policy is intended to meet this federal requirement.

A. After-the-Fact Reporting

Mount Holyoke College uses an “after-the-fact effort reporting” system to comply with the federal effort certification requirement. Under this system, the distribution of salaries for employees working on federally funded projects will be supported by Time and Effort Reports.

Salary charges to grants are made initially on the basis of estimates made before the services are performed. Time and Effort Reports will reflect the percentage distribution of salaries of employees. If significant (>5%) differences between the estimated charges and actual distribution of effort exist, the charges will be promptly adjusted to reflect actual effort.

B. Time and Effort Reports

Time and Effort Reports will reflect the percentage distribution of effort by Mount Holyoke faculty and exempt employees charged to federally funded projects. Each Principal Investigator is responsible for confirming, by their signature on the Time and Effort Report, the percentages of effort allocated to federally funded projects.

Effort is not determined based on a 40 hour week, but rather on total hours worked. It is based on 100% of activities for which employees are being compensated, including sponsored and non-sponsored activities, for a given time period. Effort is expressed as a percentage of total compensation.

Voluntary Uncommitted Cost-shared Effort should not be included in the Time and Effort Reports. Voluntary Uncommitted Cost Sharing is effort that is over and above that which is committed and budgeted for in a sponsored agreement, and is not monitored by the College. It is voluntary effort that is not required by a sponsor, nor offered in a proposal, but occurs in the course of executing the project, primarily in the form of actual effort being greater than budgeted effort.

Time and Effort Reports do not need to be completed by clerical staff or students who fill out a bi-weekly time sheet.

Principal Investigators are required to confirm that the Time and Effort Reports of any employees working on their grants are accurate. Confirmation is indicated by a countersignature.

on the report.

Time and Effort Reports are required twice annually. They will be distributed to all applicable employees approximately 15 days from the close of a reporting period. Completed reports must be submitted to the Grants Accountant in Financial Services no later than 30 days after the distribution of the Time and Effort Reports.

Completed Time and Effort Reports will be filed in Financial Services.

C. Other Items of Note

1. When a PI is absent in excess of 90 days from his/her project, pre-approval must be obtained from the sponsoring agency.
2. When a PI reduces his/her effort by 25% or more in a grant year, pre-approval must be obtained from the sponsoring agency.
3. Time spent in the preparation of proposals cannot be charged to a sponsored accounting unit. Therefore, it is inappropriate for an employee to be paid from sponsored accounting units to prepare and submit proposals.

For further information, contact the Grant Accountant at (413) 538-2702.