Effort Reporting Policy and Procedures
The purpose of this policy is to ensure compliance with sponsor requirements, including Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, for the planning, confirmation, and certification of effort associated with Federally sponsored projects.

Policy
Wellesley College will maintain documentation to support that salary and wages charged to sponsored projects are accurate, allowable, properly allocated, and consistent with the effort expended. Principal Investigators and all employees paid from sponsored projects are required to verify the payroll charges on sponsored projects at least annually.

Certification that payroll charges are reasonable in relation to the project effort may be achieved through the submission of timesheets to payroll prior to being paid, or through an after-the-fact effort reporting system.

Procedures
Submission of timesheets
Students and casual wage employees may be paid from multiple jobs, where each job has a single source of funding (e.g. grant, department budget, endowment fund). These employees verify their effort on sponsored projects through the submission of hours against each position prior to being paid. It is the responsibility of the employee and the Principal Investigator to ensure that the employee has chosen the correct position, and therefore funding source, when submitting their hours.

Corrections to the allocation of student and casual wage hours may be made by following the procedures outlined in the Cost Transfer Policy. Supporting documentation for these corrections should include information from the employee or the Principal Investigator regarding the effort devoted to sponsored projects during the period subject to the transfer.

After-the-fact effort reporting
Salary and wage distributions for other employees, including exempt and non-exempt staff and faculty, to sponsored projects should reflect that individual's anticipated activities on sponsored projects, whenever possible, and should be recorded on the costing allocation of the individual for the period in which the activity occurs.

Individuals' sponsored project allocations should be monitored throughout the life of an award. Retroactive and prospective changes to cost allocation should be made in a timely manner to reflect changes in the individual's activity on sponsored projects. In particular, changes to costing allocations should be considered when a new or modified award is received, when there is a change in personnel assigned to the project, or when new responsibilities are assigned to an individual.

Each employee whose time is partially or fully allocated to sponsored projects based on budget estimates or anticipated activities, regardless of whether such time is paid by the sponsor or is an unpaid contribution, shall review those interim charges after-the-fact. The responsible employee must certify that their salary allocations reasonably approximate their effort over the reporting period. Effort reports must also be approved

by the Principal Investigator. If an employee or Principal Investigator has left the College or is otherwise unable to fulfill these duties, the responsibility to certify and approve effort reports will be assigned to a responsible person with a suitable means of verification that the work was performed, generally the succeeding Principal Investigator or the employee's supervisor.

Effort reports record effort as a percentage of total institutional effort compensated by Institutional Base Pay, not as hours worked. All of an individual's compensated activities equal 100 percent of effort, regardless of whether they are accomplished in 30, 40 or 50 hours per week, and regardless of the appointment FTE. Institutional Base Pay is defined as the regular salary paid for an individual's primary appointment (9 or 12 months), excluding supplemental payments (one time or recurring), awards, allowances, stipends, activity pay, bonuses, incentive pay, administrative supplements and/or compensation for special programs and activities.

Significant differences (5% FTE or greater) between the planned and actual distribution of effort are resolved with a financial entry to correct the payroll distribution. Because teaching, research, service, and administration are often inextricably intermingled, a precise assessment of factors that contribute to costs is not always feasible, nor is it expected.