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What is effort?
Effort is the portion of time spent on a given professional activity and expressed as a percentage of the total professional activity for which an individual is employed by the University of Alaska. (Total professional activity includes research, teaching, administrative and other University appointed activities.)

As recipients of federal funding, educational institutions must abide by Title 2 Code of Federal Regulations (2 CFR), part 220 (formerly Office of Management and Budget Circular A-21). 2CFR, part 220 requires an effort certification system that:
- Encompasses all employee activities (100% effort)
- Confirms effort expended after-the-fact
- Requires certification to be performed by an individual who has first-hand knowledge or used suitable means of verification to determine if the work was performed
- Requires certification to be encompassed in the institution's official records

What is effort certification?
It is the affirmation by the individual completing the effort certification report that the percentage of effort reported is accurate.

Who must complete an effort certification report?
Effort reporting is a condition of accepting Federal funds. All individuals paid from, or with effort committed to, a federal-sponsored project are required to complete an effort certification report.

Exceptions:
- Pre and post doctoral individuals supported 100% by fellowship (stipends) with no additional employment compensation
- College Work Study employees

What are the effort reporting compliance requirements?
Principal Investigators and their campus departments are responsible for ensuring full compliance with effort reporting requirements. Campus departments and extramural fund accounting offices (grants and contracts) must take progressive action to prompt corrective action and resolution according to local campus policy when required, including:
- Notification of the Department Chair or director for resolution
- Notification of the Dean to expedite resolution
- Notification of the Vice Chancellor for Research and/or Provost and request intervention and resolution

What is effort commitment?
Effort commitment is the amount of effort promised by the institution in the proposal or the amended effort included in the award documentation.

The total distribution of effort dedicated to all institutional activities for an individual *must not be greater than 100%, including cost sharing commitments.*

100%, nor nearly 100% research effort, is not realistically possible for individuals with significant non-research obligations to the institution (administrative [i.e., provosts, deans, directors], public service or teaching).

If key personnel intend to reduce their committed effort on a sponsored program by more than 25%, the

institution needs to notify the sponsor and receive approval (e.g. reducing from 20% to 14%). NOTE: Review agency re-budgeting rules as requirements may vary.

- Explanation: the 20% is a representation of part of base salary, but equals 100% effort for a particular project. Reducing that 20% by 6% of base salary actually constitutes a reduction in the 100% effort for that project by greater than 25%.
- If the receipt of an award increased an investigator's total effort commitments to greater than 100%, the investigator must revise the level of committed effort requested by communication with the sponsor, reduce effort on other activities, or refuse the award

Why do we certify effort?
We certify effort to ensure that:
- Effort supported (paid) by a federal project has been performed as promised, and
- Effort expended in support of a federal project but not paid by the project has been performed as promised (cost sharing.)
    o Effort certification reports are nearly always reviewed by federal auditors when sponsored programs are under review ed.
    o Personnel salaries and benefits typically represent 2/3 of the direct costs of federal awards

What is a reasonable estimate of effort?
Sponsors recognize that the activities that constitute effort are often difficult to separate. Effort certification must often rely on a reasonable estimate of effort, and when estimating, a degree of tolerance (at UA, up to 10%) is appropriate.

- Example: It would be reasonable for a faculty member who was awarded and expended 40% effort on a grant to sign an effort certification report stating 35% payroll support for that grant. It would not be reasonable for a full-time faculty member who teaches 2 days a week to certify that she worked 80% on sponsored research.

A-21 states that "In the use of any methods for apportioning salaries, it is recognized that, in an academic setting, 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. Reliance, therefore, is placed on estimates in which a degree of tolerance is appropriate."

What activities are *included* in the calculation of total University effort?
- Externally sponsored research, including activities such as delivering special lectures about specific aspects of the ongoing sponsored project, writing reports and articles, participating in appropriate seminars, consulting with colleagues and graduate students, and attending meetings and conferences.
- Departmental/University research, including uncompensated participation in study sections, peer review of manuscripts, or unfunded effort on externally sponsored research.
- Instruction/University Supported Academic Effort, including presentations to students/trainee groups, mentoring trainees (unless specifically part of a sponsored project), and participation in resident training.
- Administrative Effort, including administrative activities, (e.g., Provost, Department Chair, Institute Director, Program Director, service on institutional committees).

Who should sign Effort certification reports?
Effort certification reports should be signed by:
- An employee, principal investigator or other responsible official with first-hand knowledge of an employee's effort, or
- A responsible official who used a suitable and documented means of verifying the effort.
- Principal investigators and other faculty must certify their own effort.
  Employees with first hand-knowledge of their own activities including knowledge of which specific federal projects are now benefited by their work may certify their own effort.

- Employees without first-hand knowledge must have a principal investigator or other responsible official certify on their behalf.
- Faculty may also be required to certify effort for non-faculty who conduct research supported by their federally sponsored awards.
- Direct supervisors can certify effort on behalf of non-faculty employees provided the person certifying the effort has knowledge of all the employee's professional activities.

UA uses a web-based on-line effort certification reporting system. Certification is accomplished by logging into the Web Time Entry system using your own personal logon ID and password, and by submitting your time sheet electronically you are also submitting effort certification reports electronically.

How do we submit an effort certification if we don't have Internet access?
Because employees may never pre-certify effort (the university uses after-the-fact certification), employees must complete a paper certification upon return to campus. Thirty (30) days leeway is acceptable to submit the certification via your department once you are back in the area. The paper certification form will be available on your Grants and Contracts office website, and once signed a copy will be inserted into the department's award file.

What is appropriate support for certification?
For a faculty member, there may be a variety of sources that report on activity or document the expectations of his or her appointment and may include the following:
- Email from employee with confirmation of effort expended, sent directly to approver.
- Lab notebooks
- Progress report documentation