



## **Procedures on Time and Effort Reporting on Sponsored Projects**

Effective: 2023.07.01

### **I. Purpose**

The purpose of this procedure is to provide specific steps to document and certify the effort devoted by an individual to a sponsored project per the institutional Policy on Time and Effort Reporting on Sponsored Projects. This procedure allows the University to ensure that salaries and wages charged or cost-shared to sponsored projects are allocable, allowable, reasonable, and consistently treated.

### **II. Who is Required to Complete Time and Effort Reports?**

All faculty and staff whose salary is charged in whole or in part to a federal award, a sponsored project or whose efforts are used to satisfy a required or voluntary cost-sharing must complete a time and effort report.

### **III. Time and Effort Reporting Procedures**

When submitting a proposal, requested salaries and wages are distributed based on an individual's expected or estimated total university effort and in relation to the individual's institutional base salary (IBS). The amount of salary support requested is usually determined by multiplying the proposed level of effort by the individual's IBS. The Uniform Guidance requires grantees to properly document and have internal controls to confirm the accuracy and reasonableness of salary charges to federal awards.

To satisfy this requirement, Sagrado employs an after-the-fact effort reporting system to certify that salaries charged or cost-shared to sponsored awards are consistent with the work performed and the committed effort. This system is implemented through time and effort reports for everyone whose salary is charged in whole or part to a federal award or whose efforts are used to satisfy a required or voluntary cost-share. These reports, which are represented in percentages totaling 100%, record the actual percentage distribution of an individual's total university (sponsored and non-sponsored activities) effort during a specific period. A 100% effort is the total time spent within the scope of an individual's appointment, regardless of the hours worked. In addition, the time and effort reports will contain data indicating the percentages of the individual's salary that were allocated to the sponsored project and other non-sponsored activities.

Each covered individual must complete the Time and Effort Report Form (see [Time & Effort Report Templates](#)) as established in this policy's Frequency of Reporting section. Principal Investigators and/or Project Directors (PI/PD) are responsible for verifying and certifying that the information provided by all employees working on their grants is accurate. Any significant changes in the level of effort must be communicated to the corresponding school dean or unit's lead supervisor, and/or the Office of Grants and External Resources (OGER) and adjusted as per indications in Sections II. B. and C. of this Policy.

If any covered individual resigns or is terminated from employment at Sagrado, they must complete the time and effort report before their departure. If this process is not followed, the Finance Office must communicate with the individual to request their signed effort report.

#### **IV. Frequency of Reporting**

Time and Effort reports from faculty members are required to be completed by semester (fall and spring), and summer and must be completed by each individual working on a sponsored project/federal award if they are compensated by the sponsored project or are committing institutional cost share. Completed reports must be submitted via email to [timeandeffort@sagrado.edu](mailto:timeandeffort@sagrado.edu) or online platform by:

1. Fall Semester (from August – December) due by January 31
2. Spring Semester (from January – May) due by June 30
3. Summer (for June and July) due by August 31

Time and Effort reports from all other personnel (non-faculty or administrative) are required to be completed twice a year and must be completed by each individual working on a sponsored project/federal award if they are compensated by the sponsored project or are committing institutional cost share. Completed reports must be submitted via email to [timeandeffort@sagrado.edu](mailto:timeandeffort@sagrado.edu) or online platform by:

1. From January – June due by July 31
2. From July – December due by January 31

The Finance Office will warrant extensions only under exceptional circumstances. Any extension request must be documented and approved by the Vice President of Finance before the reporting deadline.

#### **V. Review/Certification of Reports**

After the time and effort report is completed and certified by the employee/individual, the PI/PD and/or supervisor will review the effort report for accuracy, and if there are inconsistencies or errors, the effort report will be returned to the employee with a change request. After the necessary changes have been made, the PI/PD and unit supervisor must certify the report and submit it to the Finance Office, specifically to the payroll analyst, via email/online platform. The Finance Office will follow up and

send delinquency notifications to the individuals that did not submit the report on time and copy OGER and corresponding unit supervisors.

The PI/PD must ensure that their reported effort and the effort of all other personnel directly charged or otherwise committed to the project are accurate and reflect the work performed on the project during each reporting period. Once the report is certified by the employee, PI/PD and unit supervisor, the time and effort report is complete. This report is considered a legal document subject to audit.

The Finance Office will reconcile all time and effort reports with payroll charges/distributions. If there is a significant difference (>10%) between the time and effort report and the compensation, a payroll accounting adjustment/cost transfer will be made to the appropriate fund source to reflect the actual effort expended accurately. Federal regulations recognize that short-term fluctuations (such as one or two months) between workload categories may occur. These fluctuations are acceptable if the distribution of salaries over the long term is reasonable and the final amount charged to the grant is accurate, allowable, and properly allocated.

## **VI. Special Considerations**

A reduction or increase in effort of more than 25% requires approval from the federal/sponsoring agency. Please contact the PI/PD, if a significant reduction or increase in effort is projected so that a request to the funder may be sent. OGER must also be informed of any such reduction or increase as many sponsors required that institutional Sponsored Programs Office initiate such requests. The sponsor's approval is required for an absence from the project for over 90 days. Please contact the PI/PD as far in advance as possible to discuss the absence from the project and to send a request to the sponsor for prior approval.

## **VII. Changes to Certified Effort Reports**

Changes to a certified time and effort report are not allowed except in limited circumstances. The requester must explain why the time and effort report was certified incorrectly and provide sufficient documentation to support the request. The Chief Financial Officer must approve any changes to certified effort reports.

## **VIII. Filing and Retention**

The Finance Office is responsible for collecting and retaining all time and effort reports. Once the certification and review process are completed, all effort reports must be incorporated into project records and kept during the applicable retention period (not less than three (3) years after project closeout for federal awards and six (6) years for PR government awards/subawards).

## **IX. Questions About this Policy and Procedures**

Questions about the scope and interpretation of this policy should be directed to the Office of Grants and External Resources Director at 787.728.1515, ext. 5804, or by email to [oger@sagrado.edu](mailto:oger@sagrado.edu).

If there is any ambiguity in any provision of this Policy, the University reserves the discretion to interpret it in accordance with the purpose for which it was established, the impact to the University's operations and good faith, unless otherwise provided by law.

## **X. Reporting Violations**

Violations to this Policy and Procedures should be directed to the office of Compliance, Internal Audit and Institutional Integrity at [cumplimiento@sagrado.edu](mailto:cumplimiento@sagrado.edu). Any violations to this Policy will be addressed in accordance with the University's policies and procedures.



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