

Research Administration Certification Program (RACP)



UNIVERSITYof HOUSTON | RESEARCH

Module 4 Export Reporting and Export Controls

Learning Objectives:

- Examine Export Control regulations, how they apply to the University and why they are significant
- Understand the three main agencies that regulate export control activities and what their individual responsibilities involve.
- Understand when an export control license is needed and what activities can trigger the need for a license
- Understand the three main exceptions whereby an export control license is not needed.
- Understand what to do and or who to contact in the event that there is a question or an export license may be needed

Effort Reporting



Effort Reporting

Effort reports are the *source documents* that validate all personnel charges to an award.

- Identifying and tracking effort should follow a consistent process, with the *goal of creating a reliable record* for employee effort and salary.
- This process should involve:
 1. Proper due diligence to *determine effort at the start* of award.
 2. A *communication system* for indicating *effort changes* throughout the grant.
 3. Proper *guidance* to individuals for use in *certifying* their effort.

Effort Reporting

Uniform Guidance

DEFINED

- Effort reporting is a **federal requirement** for institutions receiving federal funds for sponsored agreements. The federal government requires institutions to maintain an **effort certification process** that complies with the requirements set forth in the Uniform Guidance and OMB Circular A-21.
- As a recipient of significant external funding, the University must assure Federal and other sponsors that the assignment of time and associated salary and fringe benefit costs to the projects they sponsor is fair, consistent, and timely.

*Mandatory
Reporting*



Effort Reporting Requirements

On Federal Awards:

- Provide verification of salary charges through effort reporting
- The university must have a payroll distribution method that reasonably reflects the activity being paid for by the sponsor
- The distribution must reflect all institutional activities of the person reporting

WHY is Effort important at UH?

- Salary and benefits on sponsored projects typically make up the majority of expenditures
- Constant audit target:
i.e.. system weakness, salary cap and salary limitation violations, late payroll reallocation and late effort certification, improper signatures, failure to include institutional effort, policy and procedure non-compliance



Effort Reporting - The Cycle

Pre-Award

Appointing
Faculty & Staff

- **Employment terms are established,** including # of months (contract period), % full time, salary base

Preparing the
Proposal Budget

- **Effort is proposed,** a commitment is made to the sponsor (may change during award negotiation)

Post-Award

Charging Salary

- **Effort is charged,** contemporaneously with activity

Certifying Effort

- **Effort is attested to,** after activity has occurred

Person Month (Effort)

- Person months is a way to express the effort (amount of time) PI(s), faculty, and other senior personnel devotes to a project.
- The effort is based on the type of appointment of the individual; e.g. calendar year, academic year, and/or summer term.
- To calculate effort percentage to person months, multiply the effort percent by the appointment type.
 - 33.33% effort \times 9 mo. appt. = 3 person months
- To calculate person months to effort percentage, divide the proposed time by the appointment type.
 - 1.5 person month \div 3 summer mo. appt. = 50% effort

Committed Effort...The Risks

UH and Principal Investigators risk penalties if the minimum obligated effort is not met.

Examples of such risks are:

1. Sponsor refusing to pay outstanding invoices
2. Sponsor canceling the agreement, or
3. Sponsor refusing to award pending proposals for other faculty at the university

Effort Reporting Roles and Responsibilities

Faculty: Reviews, adjusts effort percentage allocation (as necessary) and legally certifies by e-signature the accuracy of the effort report.

Department Administrators (DBA): Review effort reports online for payroll accuracy, process payroll reallocations to update distribution of effort charged, update any cost sharing information, and send forms electronically to Principal Investigator for e-signature.

Office of Contracts and Grants (OCG): Releases effort forms for certification, track the receipt of forms to ensure 100% compliance, and contact DBA and Faculty regarding outstanding effort forms

Total Effort = 100%



100%

How Effort is Calculated

$$\frac{\text{Total salary charged on the account for the reporting period}}{\text{Total salary for the reporting period}} = \text{Effort Percent}$$

Effort

Account	Effort (Sept – Nov)
G111122	\$4,500 / \$13,500 = 33.33%
G222233	\$4,500 / \$13,500 = 33.33%
NA	\$4,500 / \$13,500 = 33.33%
Total 3mth Effort	\$13,500 / \$13,500 = 100%

Payroll

Account	Salary (Sept – Nov)
G111122	\$4,500
G222233	\$4,500
NA	\$4,500
Total 3mth Salary	\$13,500

Payroll vs. Effort

- Payroll showcases the allocation of salary
- Effort showcases the allocation of an activity
 - Payroll is the basis for accessing the effort worked on an activity based on the accounts salary is initially allocated too.
 - Other factors, such as cost share, is used to accurately reflect the effort worked on awarded projects

Salary Cap

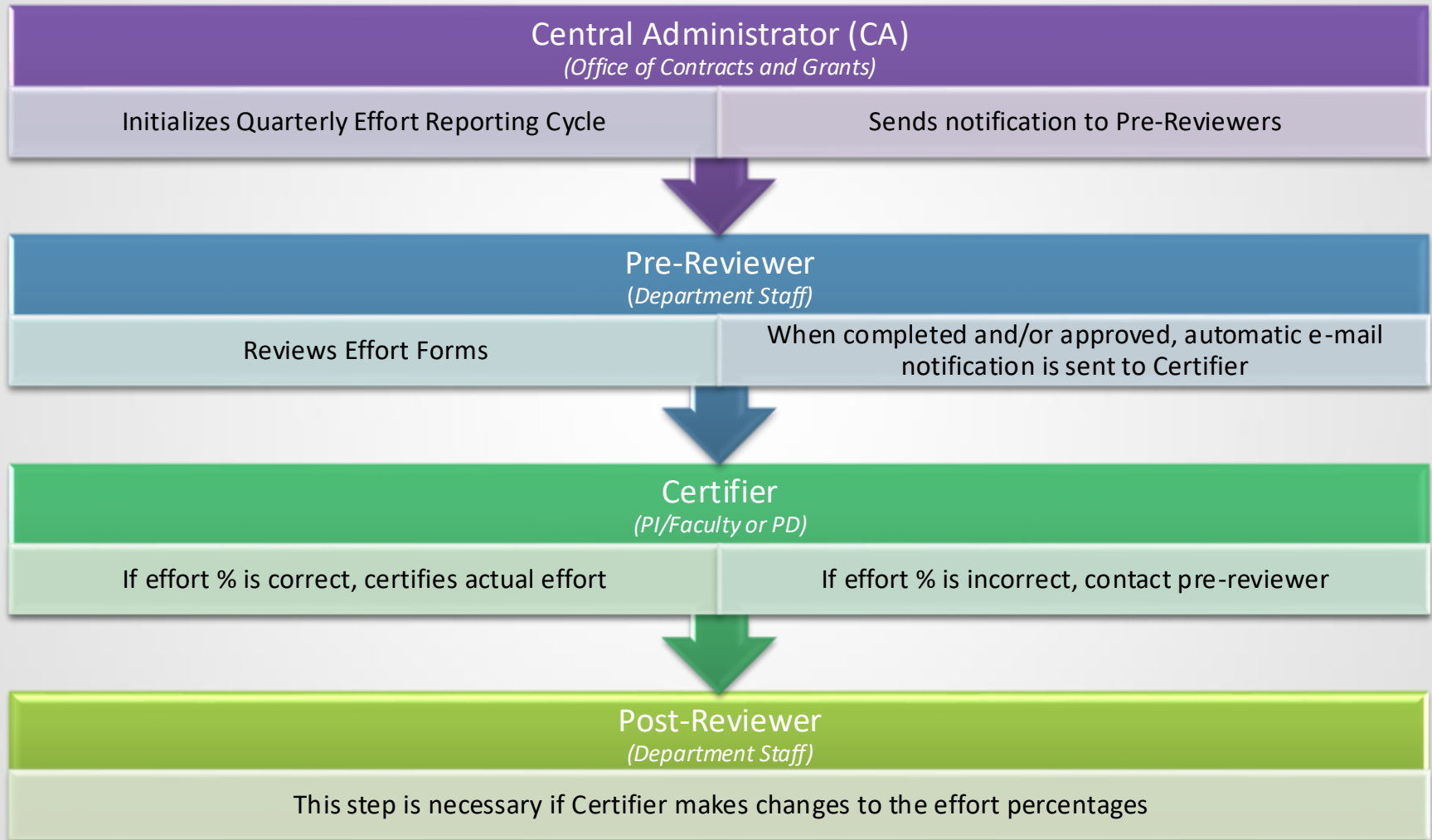
- There are some Sponsors that impose a salary limitation that Key Personnel can directly charge to the project.
 - National Institutes of Health (NIH)
 - \$185,100 per year for awards issued/modified between January 10, 2016 through September 30, 2016
 - \$185,300 per year for awards issued/modified between January 11, 2015 and January 9, 2016
 - National Science Foundation (NSF)
 - Limiting faculty summer salaries to no more than 2/9th of the academic salary

Example of Salary Cap:

- Salary requested (committed effort), is based on the salary cap, when the annual IBS is **greater** than the cap.

Institutional Base Salary (9 month appointment)	\$200,000
NIH Salary Cap	\$185,100
Committed Effort	3 person month ($3/9 = 33\%$ effort)
Proposed salary @ 33% effort (w/o salary cap limitation)	\$66,000
Proposed salary @ 33% effort (w/ salary cap limitation)	\$61,083
Difference charged to non-sponsored account	\$4,917
FTE distribution to NIH project (equitable to 33% committed effort)	30.5%

Effort Reporting Process Flow Chart



MAXIMUS Effort Reports

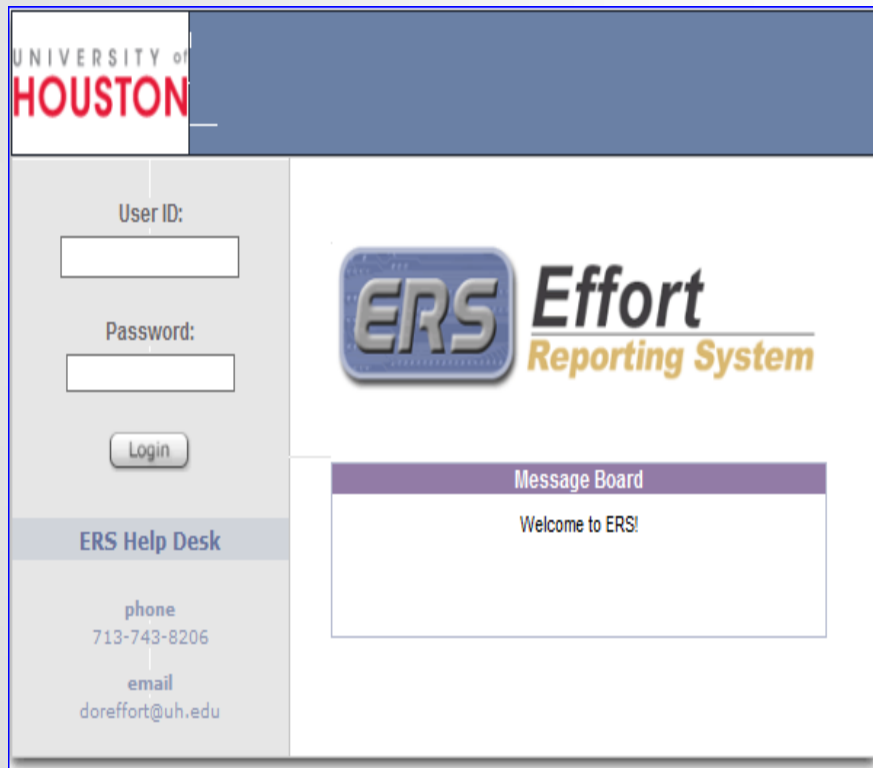
University of Houston Reporting Period: FY15_Q2 (12/01/2014 - 02/28/2015)													
Personal Information													
Name SubDept: H0113				Employee ID: Division: H0412				Title: Assistant Professor Title Code: 1030					
Effort Status As Of Wed Jul 29 16:47:55 CDT 2015													
Review Process		Review Flag		Reviewed By				Reviewed At					
Pre Review Certify Post Review Flag		N N N Basic (BAS)											
Effort Form As Of Wed Jul 29 16:47:55 CDT 2015													
Commitment	Payroll	Accounts	CS from Pre	SubTL \$ from Pre	SubTL % from Pre	Certified Effort	CS from Post	Adj. TL \$	Adj. TL %				
Sponsored Accounts													
	\$2,744.07	10% 00730-5013-H0114-B0001-G106062 (53772)	Preschool Vision Scr	\$0.00	0%	\$2,744.07	10%	N/A	N/A	N/A	N/A	\$2,744.07	10%
0%	\$6,860.15	25% 00730-5013-H0114-B0001-G107557 (55916)	Identification of op	\$0.00	0%	\$6,860.15	25%	N/A	N/A	N/A	N/A	\$6,860.15	25%
0%	\$9,604.22	35%	Total Sponsored Accounts:		\$0.00	0%	\$9,604.22	35%	N/A	N/A	N/A	\$9,604.22	35%
Non-Sponsored Accounts													
	\$17,836.42	65% 00730-1026-H0113-A0577-NA (13029)	OPT FACULTY SALARIES	\$0.00	0%	\$17,836.42	65%	N/A	N/A	N/A	N/A	\$17,836.42	65%
	\$17,836.42	65%	Total Non-Sponsored Accounts:		\$0.00	0%	\$17,836.42	65%	N/A	N/A	N/A	\$17,836.42	65%
	\$27,440.64	100%	Grand Total:		\$0.00	0%	\$27,440.64	100%	N/A	N/A	N/A	\$27,440.64	100%

- Employee Information:** Demographics on the employee e.g. Name/EMPL/Title/Department
- Commitment:** Cost Share and Committed Direct Charges are group together under this column
- Payroll:** Payroll from PeopleSoft only on viewable effort forms (*not* on the print out of the effort form)
- Accounts:** List of **all** accounts for the PI's only, even if payroll was not charged.
- Cost Share:** Changes to effort percentages on the form are updates to cost share.
- Certified Effort:** Percentage and dollar value the PI certified too
- Post Review Information:** Changes to the effort form after the form was certified by the PI and adjusted by Post-Reviewer
- Adjustments:** any adjustments to the original form
- Effort Report Information:** Shows the reporting period for the effort form

Effort Reporting System (the online process...)

What to do and Who to Contact:

EFFORT REPORTING SYSTEM (ERS)



The screenshot shows the ERS login interface. On the left, there is a login form with fields for 'User ID:' and 'Password:', a 'Login' button, and contact information for the 'ERS Help Desk' including a phone number (713-743-8206) and an email address (doreffort@uh.edu). The top left corner features the 'UNIVERSITY of HOUSTON' logo. The main area displays the 'ERS Effort Reporting System' logo and a 'Message Board' section with the text 'Welcome to ERS!'.

- Log on: Use your CougarNet ID and Password
- Click on the number “Status/My To-Do” box
- Click on the individual (s) listed as requiring certification to view the effort form
- Review the form to confirm the % of effort contributed to each project
- If correct click the certify button. If incorrect, contact your DBA
- To print a summary of the report, click on the printer icon located in the upper right hand corner of the effort form

* For more information send inquiries to OCG at doreffort@uh.edu or review the policy and procedures via [Effort Reporting Website](#)