

Frequently Asked Questions

~ Effort Reporting Training ~

1) **Question:** I generally work 50 to 60 hours per week. Is my effort computed as a fraction of the 'standard' 40 hour work week?

Answer: No. Your effort should be computed as a fraction of the total hours you spend in your Vanderbilt professional capacity, not as a fraction of a 40 hour week.

2) **Question:** Is the budget a reasonable method for allocating payroll distribution charges and certifying effort on restricted centers?

Answer: No. A person should be charged and certified on the cost center(s) where the actual work was performed.

Frequently Asked Questions - Continued

3) **Question:** Can I reallocate effort simply to use up unspent funds or to clear a deficit on a federal project?

Answer: Generally, no. A person's effort must be charged to the cost centers where the actual work was performed. However, it should be noted that any "unfunded" effort on the project should be allocated to the **cost sharing** code and charged to a non-federal source of funding. By so doing, the effort is appropriately associated with the sponsored project while, at the same time, the cost is charged elsewhere.

4) **Question:** Can anyone sign the effort certification?

Answer: No. The individual performing the work should sign the effort certification. Exceptions to this policy should be rare.

5) **Question:** In my proposal, I committed 5% of my time to an NIH research grant without requesting salary support. Can I leave that off my PAF (effort certification) since I didn't request salary support?

Answer: Since this effort was committed (regardless of whether salary support was requested), the effort you actually worked on the project must be reported on your PAF. Since there was no salary support for this effort, it must be reflected as cost shared effort.

It should be charged to job code 9910 which will allow the effort to be certified as cost shared effort.

6) Question: How is my effort preparing my next new or competing grant proposal reported and funded?

Answer: Time spent preparing a *non-competing renewal* /progress report on a project is viewed as chargeable to the sponsored project. Similarly time spent preparing *competing renewals* and proposals that are a logical extension of currently funded research are also viewed as chargeable to sponsored projects. However, a recent OIG audit determined that the effort of the competing renewal relating to past work was allowable, but that new proposed work for the future is to be considered department administration.

Salary support for time spent on a *new proposal* that is not a logical extension of currently funded research must come from unrestricted or other discretionary funds. Availability of such funds is determined by the division chief and/or Department Chair and should be discussed before effort is committed or expended.

7) **Question:** Is effort related to service on review panels or other advisory activities for federal or non-federal sponsors included in my total effort?

Answer: No. Effort related to review panels or other advisory activities for federal or non-federal sponsors that may or may not include an honorarium, per diem, and/or travel reimbursement is excluded from your total Vanderbilt effort. Activities excluded from effort reporting are activities such as consulting, volunteer/community/public service that are conducted outside the terms of your Vanderbilt employment because whether you do them or not, they do not affect your Vanderbilt compensation.

8) Question: For purpose of effort reporting, what does “*instruction*” mean?

Answer: Instruction means the preparation, evaluation, and delivery of teaching and training activities of the university, regardless of whether offered on a credit or non-credit basis. It also includes instruction related activities such as thesis advice, mentoring of students and similar activities. Effort related to instruction is included in your total effort.

9) Question: For the purposes of effort reporting, what does “*administration*” mean?

Answer: Administration includes effort incurred that benefits common or joint Medical Center, School of Medicine, or departmental activities or objectives in Deans/ Vice-Chancellors’ offices, academic departments or programs and divisions, and organized research units. Effort related to administration is included in your total effort.

10) **Question:** What about mentoring of students that directly relates to my sponsored research?

Answer: This may be included in the effort you report as part of your sponsored research. OMB circular A-21 states that charges to sponsored agreements may include reasonable amounts of time for activities contributing and immediately related to work under the agreements, such as delivering special lectures about aspects of the ongoing activity, writing reports and articles, participating in appropriate seminars, consulting with colleagues and students, attending meetings and conferences.

11) **Question:** How do I classify effort related to thesis committees, search committees, admission committees, and similar activities?

Answer: Generally these types of activities are considered to be administrative or instructional.

12) **Question:** My administrator handles my PAF. How is s/he supposed to know how I spend my time?

Answer: Your administrator's ability to handle your PAF effectively depends on your communication with him/her. As your effort on sponsored projects changes, let your administrator know so that appropriate changes to your PAF can be made.

13) **Question:** How is effort reported when I am sick or on vacation?

Answer: Vanderbilt pays vacation and sick leave by distributing this time to all current fund sources, so this should be reported as if you were at work. Extended leaves of absence warrant further review and discussion with your department administrator, and/or Department Chair.

14) **Question:** My PAF indicates that I am spending 90% of my time on sponsored projects, but I am actually spending 20% of my time seeing patients in the clinic, serving on committees and working with students. What should I do?

Answer: The PAF must be adjusted. Work with your administrator so that s/he can make the appropriate changes to your PAF to reflect your actual effort. A retroactive adjustment may be necessary to correct your effort for past months. If the effort adjustment results in funding problems, work with your administrator, PI and/or your director/ Department Chair to resolve the issue.

15) **Question:** I am fairly new to the research community, and I am not sure I completely understand the nuances of effort reporting and certification policies and procedures. What should I do?

Answer: It is vital that each researcher with federal effort report that effort correctly. Contact your department administrator. S/he can help you understand how effort reporting and certification impacts you and how to reflect your effort on your PAF.

All investigators with federally supported effort are required to take online effort reporting training.

16) **Question:** I've just learned that one of the individuals working on my grant has misrepresented their effort. What should I do?

Answer: Work with your department administrator and/or Department Chair to resolve the issue.

Communicate with **Craig Carmichel, Steve Todd, Henry Workman** or **Paula Yarbrough** at 322-2381 if additional assistance is required.

You may also contact Internal Audit or the Compliance Hotline at 343-0135. Calls to all of the above will be completely confidential if that is your wish.