

Effort Certification Frequently Asked Questions

1. How is “Total Effort” defined?

Total Effort is defined as actual Effort devoted to all the activities for which Yale compensates an employee for their appointment.

For faculty at Yale, 100% Effort is the total time spent conducting University business regardless of the number of hours worked and includes teaching, research, clinical, administrative, and public-service activities. Most ladder faculty generally have responsibilities that would preclude them from devoting 100% of their time to sponsored activities.

For non-professional staff positions, 100% Effort consists of total hours worked including overtime.

2. Can a faculty member who is working part-time at Yale use their uncompensated time to write and submit a Yale proposal?

Yes. For example, a Senior Research Scientist whose salary and corresponding Effort is reduced from a 100% FTE to a 75% FTE due to a reduction in funding, may use the uncompensated time to prepare and submit proposals to sponsors.

3. Who are “covered individuals”?

Anyone who has committed Effort to a sponsored project (excluding fellowships) or is paid by a sponsored project at Yale must have their activities certified in an Effort report; thus, that person would qualify as a “covered individual” for whichever period(s) they perform sponsored activities.

4. When is it necessary to make changes to an Effort Certification Statement (“ECS”)?

The percentages in the Certified Percentage of Total Estimated column of the Workday ECS are provided for informational purposes only. They represent the payroll costing allocation (averaged over the reporting period) of the covered individual's compensation among the listed sponsored projects and other activities. That distribution may or may not be consistent with actual Effort on the projects and activities and can be adjusted as appropriate.

If the Certified Percentage of Total Estimated percentages on the ECS do not correspond to the percentages of the individual's actual Effort for the listed projects or activities (or other projects or activities that may not be listed), the person completing administrative review of the form should make the necessary changes to the ECS.

The Certified Percentage of Total Estimated percentages populated on the ECSs may not always represent the Effort devoted; they reflect the percentage of salary charged to each account averaged over the reporting period. When certifying the ECS, the criterion to be used is how the individual's Effort was expended for the reporting period ensuring that the Effort devoted is not less than the salary charged. Effort expended as voluntary uncommitted cost sharing should be reflected in the Comment box on the ECS.

5. Can a previously certified ECS be changed?

Salary reallocations made as a result of the Effort Certification process must be made in accordance with University policies and procedures on salary reallocations and cost transfers.

Effort reports are expected to be certified within 60 calendar days from the date of the availability notification. Changes made to Effort within the open Certification period are not considered to be previously certified.

Once the Certification deadline has passed, only in rare circumstances will subsequent salary adjustments be permitted. Adjustments decreasing Effort must always occur regardless of timeframe. If it is necessary to adjust the salary charges for a previously certified Effort period, documentation must provide a detailed explanation of the need for the salary adjustment and

subsequent recertification. This documentation must be approved by the PI and be submitted to SPFA for approval. If approved, a recertification of the Effort period may be required.

6. For someone working on multiple sponsored projects, how should committed Effort on a sponsored project be documented if paid for by the University (cost shared)?

Sponsored project Effort not compensated by an award but committed as part of the proposal and subsequently awarded is a financial responsibility of the University. In order to fulfill this responsibility, salary must be charged to cost sharing Chart of Accounts (“COA”) values. Payroll costing allocations must be maintained in order to appropriately charge subsequent salaries to the cost sharing COA values.

7. If I worked on one or more sponsored projects and did not charge salary to any of them, do I need to submit an ECS?

There are situations when an ECS is not generated and committed Effort was devoted to a sponsored project. In such situations, the responsible ECR must access the Effort Report template: [Form 1315 FR.01](#) for completion and Certification purposes. Instructions for completion are located here: [Form 1315 FR.01 Effort Report Instructions](#).

8. What if I need to start my research and expend Effort and incur costs on an award prior to receiving a fully executed contract, grant, or cooperative agreement?

For situations where an award is delayed, contact OSP to determine if an At-Risk Account is appropriate to request/create. No work for an award should begin until such determinations are made. Remember, At-Risk Accounts are subject to compliance requirements contained in [Pre-Award Costs and At-Risk Account Requests](#).

9. What if my Effort on a particular grant changes over time or is significantly different from committed Effort?

It is the PI’s responsibility to obtain University (Chair and OSP) and sponsor prior approval for absences greater than 3 months or significant (25% or more) [reductions of effort](#) of the PI or others named in the award notice (check sponsor specific terms and conditions and sponsor policy manuals). Salary charged to an award that is greater than the Effort devoted must be adjusted accordingly.

10. What steps should I take if a PAA adds Effort to a grant (when all Effort was previously non-sponsored), is submitted after an Effort period was initiated, and an Effort report was not generated in Workday?

It is the department’s responsibility to contact effort.reports@yale.edu to inform them that an off-cycle ECS will need to be initiated for an individual that did not have qualifying Effort at the time of the period release. The ECM will verify that an ECS is required and would generate the appropriate ECS for review. The ECS is required to be completed in accordance with the due dates outlined in the [Effort Reporting Calendar](#).

11. How is “cost sharing” defined?

A portion of total sponsored project costs not funded by the sponsor (unless otherwise authorized by Federal statute). Refer to [Policy 1306 Cost Sharing on Sponsored Projects](#) for additional information on Cost Sharing.

12. How should salary over a sponsor-imposed salary rate cap be captured?

When a salary over the cap situation occurs, both the salary charged to the award and the salary representing the capped amount must together fulfill the commitment of Effort made to the sponsor. It is imperative that the capped amount/% is properly coded so it is reflected in the sponsored awards section of the Effort Certification Statement.

Irrespective of a sponsor-imposed salary cap, all key personnel impacted by the cap must devote the Effort to which they committed in the proposal and subsequently awarded. (Review [Policy 1316 Effort Commitment: Managing Effort Associated with Sponsored Projects](#)).

The salary exceeding the sponsor's "capped amount" must be accounted for with COA values that include the same grant worktag as the reimbursed salary. (Refer to [Procedure 1315 PR.03 Salaries Above a Sponsor Imposed Rate Cap](#)).

Note: Carefully check award notices and referenced manuals/handbooks (both federal and non-federal) to determine if sponsors other than those applicable DHHS agencies apply a sponsor-imposed rate cap.

13. How do I complete Certification for individuals charged to the CMHC Staffing Contract?

The standard procedure of charging salary over a sponsored imposed rate cap to cost share cannot apply to Psychiatry faculty whose research is supported by the CMHC Staffing Contract because it is also a sponsored award. For these cases, a note should be entered in the ECS's comment box reflecting the total percent of Effort being supported by the grant and the CMHC Staffing Contract Funds. Example: "A portion of (or all of) my over-the-cap is paid from the Staffing Contract (GRXXXXXX). Actual Effort by grant is as follows: GRXXXXXX 5%, GRXXXXXX 8%, etc." Details are to be kept in the Psychiatry Business Office.

14. Why does a graduate student's ECS often show 100% funded research while being supported by a training grant?

The Uniform Guidance (2 CFR Part 200) exempts Effort devoted to training grants from the Effort Reporting requirement. Therefore, if a graduate student is a trainee supported by a training grant and also supported on a research award, only the research award will appear on the ECS as 100%. This means that 100% of the pay received for that reporting period was for the Effort devoted to the research award only.

However, if a graduate student is supported on a research award, a training grant, and is also receiving compensation for teaching, both the compensation for teaching and the research will appear on the ECS.

15. If a postdoctoral researcher is both a Postdoctoral Associate ("PDA") and a Post Doctoral Fellow ("PDF") during a reporting period, why is it the Effort percentages do not include compensation received as a PDF?

The Uniform Guidance (2 CFR Part 200) exempts all remuneration paid on fellowships from the Effort reporting process. PDFs may also receive salary compensation for research services. Refer to the [Postdoc Affairs Website](#) for more information. Also refer to the Workday Training Guide [Change Job: Convert PDA to PDF \(Academic\)](#).

16. As a faculty member, in order to receive summer salary, when must I expend the Effort?

Faculty who receive summer salary from sponsored projects are required to certify to the Effort devoted *during the summer Effort Reporting period*. Effort expended during the academic year on a sponsored project cannot be applied to the summer Effort Reporting period. A request to the Department Business Office for summer salary indicates a commitment to put forth the comparable Effort on the particular project during the summer, not the academic year. Effort expended during the academic year does not satisfy a commitment related to the receipt of summer salary.

17. Can I claim three months of summer compensation and still have other summer activities?

Faculty compensated for 9-month academic appointments are permitted to expend up to an additional 2.5 months of summer Effort on one or more sponsored projects in the

period beyond the academic year (i.e., during the summer research period) and earn up to 2.5 months of additional salary for that Effort, subject to sponsor and University policies and the approval of the Department Business Office.

If a faculty member has administrative or other non-research responsibilities during the summer period (dual appointments), they are precluded from devoting 100% Effort to sponsored projects and thus can earn up to 2 months of salary from those sponsored projects.

18. What are the special requirements for Veterans Affairs Connecticut Healthcare System appointments?

Refer to [Memorandum of Understanding Requirements: Faculty with both a Veterans Administration Medical Center and Yale University Joint Appointment](#).

19. What are the typical Effort requirements for NIH Career Development (“K”) Awards?

The NIH requires that total salary requested on a K Award be based on a full-time, 12-month staff appointment requiring the candidate to devote a % of full-time professional Effort (usually 75%) to conduct health-related research. The remaining Effort may be devoted to clinical, teaching, or other research pursuits and activities consistent with the objectives of the award. Please review the following NIH requirements:

- [Determining Full-Time Professional Effort For Career Awards](#)
- [Mentored Career Development Awards: Change in NIH Policy Concerning Concurrent Support from Career Development Award and A Research Grant](#)
- [K Kiosk – Information About NIH Career Development Awards](#)

20. Should PI Effort, devoted to other research awards and charged to the K award, be explained in the ECS Comments box?

Salary for Effort related to the career development plan is typically supported by the K award funds to provide protected time (usually a minimum of 50% or 75% Effort) required for the training experience; therefore, the Effort Report will reflect only the salary percentage charged specifically to the K award. Though not required, the administrator or the faculty certifier are encouraged to explain (in the ECS Comment box) the concurrent Effort devoted to other research awards that are in support of the career development plan. The inclusion of the % Effort devoted to other research awards supports the commitments made to those sponsors.

Note: The K award proposal or annual progress reports must include references to all related research and clinical activities consistent with the objectives of the K award.

21. Is it required to account for salary in excess of a Career Development (“K”) award program’s salary limitation as well as, document Effort that meets the minimum Effort requirement?

Yes. The maximum salary that is allowed to be charged directly to a K award is limited by the NIH’s institute or center (or other sponsoring agency who award Career awards). If the PI’s salary exceeds the limit, the University must account for that salary in excess of the salary limit. **However**, the salary in excess of the limit is not considered institutional cost sharing.

The table below illustrates three salary limit scenarios. In the first two examples, the PI’s salary exceeds the sponsor’s limit. In general, to account for the excess salary (supporting the Effort requirement) the excess is normally charged to a non-sponsored award COA value that includes the Grant and the University source of funds supporting the salary excess amount.

PI’s IBS	Career Program Salary Limitation	Minimum Effort Required	Payroll % K Award	Payroll % Unrestricted (KSL)
\$130,000	\$90,000	75%	69%	6%
\$125,000	\$90,000	75%	72%	3%

\$90,000	\$90,000	75%	75%	0%
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If a linked account **cannot** be achieved (e.g., the CMHC staffing contract), a note can be entered in the Effort Certification Statement's Comment box reflecting the percent Effort being supported by unrestricted funds. Illustrative Comment box example: "The PI's salary representing the 75% Effort commitment to the K award exceeds the amount allowable by the sponsor and is additionally supported by the CMHC staffing contract. Therefore, only 69% of the PI's salary is directly charged to the K award and the remaining 6%, fulfilling the 75% commitment, is supported by XXXXX account."

22. Should PI/Key Personnel committed Effort devoted during sabbatical or triennial leave and charged to University funds, be noted in the ECS comment box?

Yes. If the faculty member is charging their salary to both a sponsored award(s) and the sabbatical account during the Effort Reporting Period an ECS will be generated. In this situation, any portion of committed Effort devoted to a sponsored award and charged to the sabbatical account must be identified as a note in the ECS Box. The notated Effort documents the expended Effort supporting the commitment to the sponsor.

If the faculty member is on [sabbatical/triennial](#) leave and entirely paid by the University (non-sponsored funds) and devoted Effort on a sponsored award(s), a paper form must be completed. Refer to [Section 8](#), above.

23. How do I reflect the difference in percentages on the ECS summary page if an individual (paid monthly) receives a pay increase that is not effective for the entire period covered by the ECS?

The denominator used to calculate the percentages reflected on the summary is total dollars for that period. The reviewer should confirm accurate percentage break down per period. A comment should be added to the ECS. Example: 'Effort percentages on the summary are skewed based on pay increase effective xx/xx/xx. Actual summary percentages are as follows: GRxxxxxx xx%, GRxxxxxx, xx%, etc.'

24. What happens if a PI refuses or otherwise fails to certify?

All Effort should be made to certify ECSs in accordance with Policy 1315. Section 7 of this procedure outlines the escalation process for failure to certify in a timely manner. If the PI refuses to certify to their Effort and salary on a sponsored project, then that salary must be removed from the award. The certifier will need to send back the ECS so that the ECR can move charges from the associated award(s) to a Yale Designated, gift or other non-sponsored, unrestricted account.

Failure to comply with the requirements of Yale's Effort Reporting policies and procedures may subject the individual and DBO to administrative and/or disciplinary actions in accordance with University disciplinary procedures. Specifically, and without limitation:

- If ECS are not completed and returned in a timely manner, salary costs associated with uncertified grant activity may be removed and charged to a departmental account;
- OSP may suspend submission of any new proposals on behalf of a noncompliant PI (or inclusion of a noncompliant researcher) in proposals until ECSs are up-to-date and properly completed and certified; or
- Certification of ECSs that are known at the time of submission to be materially inaccurate may expose the individual who completed the reports to personal disciplinary action.

