Draft Effort Reporting Policy

Purpose:

Conduct of research is a primary mission of the University of New Mexico. The University is committed to ensuring that effort expended on federally sponsored agreements is appropriately documented, that salaries and wages charged to sponsored agreements reasonably reflect the effort expended on those agreements, that effort is certified by authorized personnel in a timely manner, and that effort certifications comply with sponsor requirements and federal regulations.

Policy:

Certification of effort is an OMB Circular A-21 requirement that the University of New Mexico agrees to when a contract or grant is accepted that is fully or partly funded by the federal government. Timely effort reports, generated by the University, are used to document the certification of effort. The OMB requirement is designed to ensure that:

- a) The percent of effort expended on each project is not less than the percent of effort committed to the sponsor to spend on the project.
- b) The percent of effort expended on each project is not less than the percent of salary charged to the project.

To comply with OMB A-21, an individual with first-hand knowledge of the work performed and the benefitting sponsored project shall certify effort reports in a timely manner.

Monitoring Uncertified Effort Reports:

The University of New Mexico is committed to ensuring that effort reports made in connection with federally sponsored projects are accurate, timely, reasonably reflect the actual level of effort expended, and comply with all agency requirements. It is each department's responsibility to ensure that a process has been appropriately established to certify effort reports on a timely basis. Effort reports that are outstanding at the certification deadline may result in salary and related costs being disallowed by the federal funding agency. Principal Investigators, department chairs or equivalent, and deans/directors or above, as appropriate, will be notified of effort reports that have not been certified.

Independent Evaluation:

The University President or designee will ensure that there are periodic reviews of the effort reporting system.

Rules, Procedures, Guidelines, Forms, and other related resources:

- 1. Rules [reserved]
- 2. Procedures [reserved]
- 3. Guidelines [reserved]
- 4. Forms [reserved]
- 5. Other Related Resources [reserved]

References:

United States Office of Management and Budget CIRCULAR A-21, www.whitehouse.gov/OMB/circulars/a021/a021.html