



**I. TITLE:
(AMENDED) TIME AND EFFORT POLICY**

II. POLICY STATEMENT:

This policy applies to Alabama State University (ASU) employees receiving any amount of income from a grant-funded agency or sponsored program. Grant-funded employees must comply with federal regulations found in OMB Circular A-21 and 2 CFR 200, Uniform Guidance (UG), and the terms and conditions of sponsored agreements.

III. SCOPE OF POLICY:

The purpose of this policy is to outline the standards, guidelines, expectations, and requirements for reporting time and effort, calculating percent effort, and appropriately determining effort distribution at ASU. The time and effort reporting is designed to ensure that all ASU sponsored program employees comply with federal government mandates to guarantee proper charging of labor costs (e.g., salaries, wages, and benefits) to federally and non-federally funded sponsored activities. The requirement for effort certification applies to any federally funded grant, cooperative agreement, contract, sub-award, or subcontract. This policy adheres to rules regarding allowability and allocability of costs on federal awards, including compensation for personnel services, and acceptable methods of effort certification.

IV. EFFECTIVE DATE:

Immediately upon approval by the ASU Board of Trustees.

V. AUDIENCE:

All faculty, staff, and students receiving salary generated by a sponsored program should have knowledge and understanding of the Time and Efforts-Policy.

VI. DESIGNATED RESPONSIBILITIES AND APPLICABILITY OF TIME AND EFFORT POLICY:

a. Office of Research and Sponsored Programs (ORSP)

The ORSP will maintain documentation of bi-weekly and monthly ~~quarterly~~ time and effort certifications for ASU grant or sponsored program funded employees each pay period.

b. Title III Office

The Title III Office will maintain pay period time and effort reports for employees and student workers whose salaries are paid fully or partially by Title III federal funds each pay period (bi-weekly and monthly).

VII. POLICY MANAGEMENT

- **Responsible Office(s):** Office of Research and Sponsored Programs (ORSP) and Title III
- **Responsible Executive:** Vice President for Business and Finance, Chief of Staff and Associate Vice President for Institutional Effectiveness
- **Responsible Officer(s):** Director of the Office of Research and Sponsored Programs and Director of Title III

VIII. DEFINITIONS:

- **2CFR200** – uniform administrative requirements, cost principles, and audit requirements for federal awards
- **Grant-funded employee** – any full-time or part-time employee at the University funded by a grant sponsored activity for a specific period.
- **OMB** – Office of Management and Budget Rationale for Proposal Submission Policy oversees and administers the federal budget and sets authoritative rules and regulations for federal grants (Subtitle A), referred to as the Uniform Guidance (UG).
- **Principal Investigator (PI)** – any person responsible for the development, technical, and fiscal management of a sponsored award.
- **Sponsored Programs** – any activity funded in whole or in part by an external agency to ASU in which deliverables or outcomes are expected to be met
- **Time and Effort** – the amount of effort (direct and indirect activities) on all projects the employee works on during a particular period.
- **Title III** – a program administered by the U.S. Department of Education, Institutional Service, began as part of the Higher Education Act of 1965. The Title III Program supports the Department of Education’s commitment to improving educational opportunities for minorities and the disadvantaged.
- **Uniform Guidance** – OMB publication entitled “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (2 CFR 200).

IX. TIME AND EFFORT FORM:

Effort for ORSP Time and Effort Certification Forms submitted by PIs, employees, and students must reflect 100% (Effort cannot exceed 100%). The reporting form must account for direct, indirect, sponsored, and unsponsored efforts and should include the period of work completed for each project.

The Title III Time and Effort Reports reflect the percentage of salary paid by Title III federal funds. If Title III federal funds pay an employee 100%, their Time and Effort report must total 100%. If the employee is paid only 25% Title III federal funds, their Time and Effort report must total 25%.

X. AGENCY REQUIREMENTS:

No federal projects shall be charged overload or overtime for any employees. See the example below.

Example: NIH has a salary cap of \$138,900. A PI with a 12-month contract earns \$150,000/year. If the PI contributes 10% effort on a project or activity then the maximum salary chargeable to that grant is \$13,890. The PI's remaining salary amount of \$136,110 must be the responsibility of the institution.

XI. PROCEDURES:

A. Office of Research and Sponsored Programs

- a. Grant-funded Employees must:
 - i. Complete a time and effort certification form at the end of every pay period. Pay could possibly be withheld if time and effort forms are not turned in.
 - ii. Submit their time and effort's to PI's for certification.
- b. Principal Investigators
 - i. Submit documents to ORSP each quarter.
- c. Employees and Additional Pay (External Funding Agency)
 - i. Faculty and staff at ASU are responsible for the performance of their regular duties assigned by the University. However, the University acknowledges that employees may perform additional duties related to a sponsored program outside of their regular work hours. In such cases, employees are awarded extra pay. Employees must adhere to the extra pay and additional duties policies outlined in the Faculty Handbook (see 4.2.2 Extra Pay for Extra Work) and the HR Policies and Procedures Manual (see 8.4.2 Extra Pay for Extra Work).
 - ii. Employees completing extra work and receiving extra pay related to a sponsored program are required to complete the Extra Pay Time and Effort Certification Form. The form must be submitted to the PI for certification.

B. Title III

- a. Title III Activity Directors and Support Staff
 - i. Each employee whose salary is paid in full or partially by Title III Federal Funds must submit to the Title III Program Administration Office a Time and Effort report each pay period (bi-weekly or monthly). The report must be certified by the employee's supervisor. Employees who perform duties related to a Title III funded activity, but are NOT paid by Title III Federal Funds, must submit to the Title III Program Administration Office an In-Kind Time and Effort Report each pay period that those duties are performed. The report must be certified by the employee's supervisor.
- b. Student Worker
 - i. Each student worker whose salary is paid in fully or partially by Title III federal funds should complete a Time and Effort Student Employee Report at the end of each month. The report should include the tasks completed and the percent of effort for each task. The report requires signatures from both the student and supervisor. The Activity Director

should maintain copies, and a copy must be sent to the Title III Program Administration Office each month.

XII. REFERENCE(S):

2 CFR 200.430 – COMPENSATION- Personal Services

<https://www.govinfo.gov>

Document History

Approved by BOT: September 18, 2020

Policy Amendment Approved by BOT: February 3, 2022