OFFICE OF THE CONTROLLER

Compliance Team Time and Effort Reporting Refresher for Principal Investigators (PIs)

February 2024





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Reminders



PI Responsibilities

- Review the salary charged to ensure the associated percentage is a reasonable representation of how the employee spent their time on the award(s) where you are the PI.
- Ensure the reported effort is consistent with any progress reports submitted to the sponsor, as applicable.
- Coordinate with your Business Manager regarding any questions, concerns, or errors/issues identified.
- As PI, you are overall responsible for the expenses that are charged to the sponsored award.



Important Dates

The next cycle of Time and Effort reports, for the July – December 2023 (period 13), will be made available on **Monday, March 4th, 2024**. Business Managers will receive an email notification and memo on this date, through the BIZMANAGER listserv, alerting them that reports are ready for your review.

After validation and release by the Business Managers, approvers (e.g., Employee, PI, Supervisor) will receive notification that effort reports are available for review. As a result, there may be a delay between when the reports are made available vs. when they are available for your review and approval.

Reports will be due on Wednesday, April 3rd, 2024.

All payroll corrections that affect the reporting period should be submitted by **Friday, February 23rd, 2024**.



Central Mailbox Update

- Questions regarding time and effort reports should be directed to <u>timeandeffort@sc.edu</u>, which is a central mailbox monitored by the Compliance Team.
- This mailbox replaces GFMeCert@mailbox.sc.edu.
- The Compliance Team monitors the time and effort reporting process rather than Grants and Funds Management (GFM); the mailbox was renamed to eliminate confusion regarding the responsible area.



Changes and Corrections

If an error is identified during the certification process that requires correction, those change requests **must be completed and submitted promptly**.

Any issues/errors identified by approvers (e.g., Employees, PIs, Supervisors) should be communicated to their Business Manager upon identification. Business Managers will then initiate any change/correction requests accordingly.

Formal recertification of the report will be required after the associated retro has been posted. Failure to request corrections in a timely manner increases the risk of untimely certification.



Workflow

- Each time and effort report begins with the Business Manager, who verifies the report and then releases it to the approvers for review and certification (e.g., Employee → PI → Supervisor).
- If the employee/PI or PI/supervisor are the same individual, certification/approval will automatically occur at the subsequent stage; two separate approvals are not required.
- If a change/correction is processed after the report is already partway through the workflow process, it will recycle back to the Business Manager for validation of the change and the workflow will begin again.



Email Notifications

- Employees, PIs, and Supervisors will receive automated email notifications from PeopleSoft when an effort report is available for review and approval.
- These notifications will come from: <u>Peoplesoft@peoplesoft.com</u>
- These emails are **<u>NOT</u>** spam or phishing.
- If an approver is uncomfortable clicking the link within the email notification, they may also log directly into PeopleSoft HCM to approve any pending reports.
- The email notifications include links to respective job aids.



Email Notification Example

From: PeopleSoft@peoplesoft.com <PeopleSoft@peoplesoft.com>

Date: Monday, September 18, 2023 at 5:22 PM

To:

Subject: Approval Needed: Effort Report, Form #635092

A Time and Effort Report has been created for approve this form or follow the link below.

https://hcm-prd.ps.sc.edu/psp/HPRD/EMPLOYEE/HRMS/c/G3FRAME.G3SEARCH_FL.GBL? Page=G3SEARCH_FL&Action=U&G3FORM_ID=635092&G3FORM_TASK=EVL

Certification is required to be completed promptly within 3 days of receipt. Failure to certify may result in the removal of salary charges from sponsored awards, in accordance with University policy and procedure FINA 3.12. Do not reply to this email. If you have questions or need assistance, please contact your Business Manager.

If you are an Employee attempting to certify your own report, you can find the training aid here.

If you are a Principal Investigator (PI) attempting to certify another's report, you can find the training aid here.

If you are a Supervisor attempting to certify an employee's report, you can find the training aid here.

Thank you for your prompt attention to this request.

Compliance Team

USC Controller's Office

timeandeffort@sc.edu



Managing Multiple Notifications

- PeopleSoft automatically sends an email notification to the person in each approval role
- As a result, if the same person is listed in multiple roles on the report (e.g., PI and Supervisor), they will receive multiple email alerting them to approve, but they only need to approve <u>once</u>
- We recognize this is not ideal and will work with our IT Team to fix this for future reporting periods; however, in the meantime, we recommend the following:
 - Create a folder within your Outlook mailbox and use the Manage Rules & Alerts feature to route these notifications to a created designated folder
 - \circ Log directly into PeopleSoft HCM to view your queue frequently



eForm Statues

Status	Description	Responsible Party
Saved	Report still requires validation and release; no action has been taken, approvers have not received the report	Business Manager
Pending	Report is awaiting approval	Employee, PI, or Supervisor
Recycled	Issue/error identified during the certification process that requires correction; report will need to be revalidated/re-released and reapproved after resolution	Business Manager
Executed	Report is fully certified and complete	N/A – no further action required



eForm "Hold" Option

- The option to <u>HOLD</u> an effort report should not be used please remind your users!
- Placing a report on hold will cause it to be "stuck" in the workflow.
- Once effort reports are released (or "submitted") by Business Managers, approvers should:
 - \circ **<u>Recycle</u>** the form if there are discrepancies or corrections needed, or
 - \circ **<u>Approve</u>** the form



Reporting Period IDs

Reporting Period ID	Reporting Period Name
1	April - December 2019
6	January - June 2020
7	July - December 2020
8	January - June 2021
9	July - December 2021
10	January - June 2022
11	July - December 2022
12	January - June 2023
13	July - December 2023

Future IDs will be added as they are created within the system. The Reporting Period IDs will increase by one as they are added.



Key Takeaways

- Time and effort reporting is "after-the-fact" accounting of actual time spent on a specific sponsored project.
- Errors **<u>must</u>** be identified and corrected **<u>timely</u>**!
- Reports **<u>must</u>** be certified by the employee.
- Reports <u>must</u> be certified by a PI and supervisor with first-hand knowledge of the employee's effort.
- Spending out grants is **unallowable**.
- Effort reports are incorporated into the official records of the University and are subject to audit and the False Claims Act.



Troubleshooting, Tips, and Tricks



Access Issues

• If you have trouble logging into PeopleSoft HCM or accessing a report, below are the most common solutions:

• Try a different browser (e.g., Edge, Chrome, Safari, etc.)

Clear the cache of the current browser and try again. You must completely close out of a browser (all tabs) and re-open after clearing your cache
 Submit a self-service HCM Help Desk ticket

 If you don't know how to clear your cache or how to submit an HCM Help Desk ticket, email <u>timeandeffort@sc.edu</u> for instructions.



Tips and Tricks

- Save **PeopleSoft HCM** as a shortcut in your browser.
- Log in once or twice a week and navigate to the "Certify a Grant Report" tab and perform open searches for reports awaiting your review and approval.
 - Open/blank searches will generate a listing of all reports currently pending your review and approval.
- Effort report certification is a multi-approver process; if one approver in the process recycles a report for corrections, the report will have to go through the entire approval process again once resolved.



Percent of Pay / Computed Effort Column

Hide Chartfields										
Spons	ored Accounts									
	Certified? ♦	Earnings ◊	Percent of Pay/Computed Effort ◊	Details	Project/Grant 🛇		Department \Diamond	Cost Share \Diamond	Op Unit/Dept/Fund/Acct/Class ◇	3 rows
1	Yes	3383.00	51.41	Details	10008668 Justice Sector Training, Resea		610000		CL002 610000 F1000 51600 301	
2	Yes	987.00	15.00	Details	10010429 Think Tank Capacity Building		610000		CL002 610000 F1000 51600 202	
3	Yes	1362.50	20.71	Details	10010886 Subaward from The Asia Foundat		610000		CL002 610000 F1000 51600 301	
Univer	rsity Accounts				3,383 / 6,580	= 51.41%				
										1 row
	Certified? \Diamond	Earnings ◇	Percent of Pay/Computed Effort ≎	Details	Project/Grant ≎	Department ◇	Cost Share \Diamond	Op Unit/Dept/Fun	d/Acct/Class ◇	
1	Yes	847.50	12.88	Details		610000		CL002 610000 E4	200 51600 202	
- <mark>Total</mark> (Qualifying Accour	Total 658								
	1 2 3 Univer	1 Yes 2 Yes 3 Yes University Accounts Certified? ◊ 1 Yes	Sponsored Accounts Certified? Earnings 1 Yes 3383.00 2 Yes 987.00 3 Yes 1362.50 3 Yes 1362.50 Subtotal 5: Percent Subtotal 5: Percent Subtotal 8: University Accounts Subtotal 8: University Accounts Subtotal 847 1 Yes 847.50 Subtotal 12: Total Qualifying Accounts	Sponsored Accounts Certified? Earnings Pay/Computed Pay/Computed Effort ¢ 1 Yes 3383.00 51.41 2 Yes 987.00 15.00 3 Yes 1362.50 20.71 Subtotal 5732.50 Percent Subtotal 87.12 University Accounts Certified? Earnings Pay/Computed Effort ¢ 1 Yes 847.50 12.88	Sponsored Accounts Certified? ○ Earnings ○ Percent of Pay/Computed Effort ○ Details 1 Yes 3383.00 51.41 Details 2 Yes 987.00 15.00 Details 3 Yes 1362.50 20.71 Details Subtotal 5732.50 Percent of Percent Subtotal 87.12 University Accounts Certified? ○ Earnings ○ Percent of Pay/Computed Effort ○ Details 1 Yes 847.50 12.88 Details Subtotal 847.50 Percent Subtotal 12.88	Sponsored Accounts Certified? Earnings Pay/Computed Details Project/Grant () 1 Yes 3383.00 51.41 Details 10008668 Justice Sector Training, Resea 2 Yes 987.00 15.00 Details 10010429 Think Tank Capachy Building 3 Yes 1362.50 20.71 Details 10010886 Subaward from The Asia Foundat Subtotal 5732.50 Percent of Pay/Computed Details 10010886 Subaward from The Asia Foundat Subtotal 5732.50 Percent of Pay/Computed Details Project/Grant () Inviewersity Accounts Subtotal 87.50 Subtotal 847.50 Percent subtotal 12.88	Sponsored Accounts Certified? ° Earnings ° Pry/Computed Effort ° Details Project/Grant ° 1 Yes 333.00 61.41 Outails 1000868 Justice Sector Training, Resea 2 Yes 987.00 15.00 Outails 10010429 Think Tank Capacity Building 3 Yes 1362.50 20.71 Outails 10010886 Subsward from The Adia Foundat Subtotal 5732.50 Precent of Details Project/Grant ° Subtotal 5732.50 Precent of Details Project/Grant ° Details Project/Grant ° Outerest Subtotal 87.12 Subtotal 5732.50 Precent of Details Project/Grant ° Department ° Subtotal 87.12 Outerest Subtotal 87.50 Subtotal 847.50 Precent Subtotal 12.88 Total desito 00	Sponsored Accounts Certified? Earnings Percent of Effort Details Project/Grant Department 1 Yes 333.00 51.41 Details 10006668 Justice Sector Training, Resea 610000 2 Yes 997.00 15.00 Details 10010429 Think Tank Capacity Building 610000 3 Yes 1362.50 20.71 Details 10010886 Subaward from The Asia Foundat 610000 Subtotal 5732.50 Percent Subtotal 87.12 Subtotal 5732.50 Percent Subtotal 87.12 Opject/Grant & Details Project/Grant & Department & Cost Share & Cost Sha	Spensored Accounts Decamings Percent of Effort Details Project/Grant © Department © Cost Share © 1 Yes 333.00 61.41 Details 1000666 Justice Sector Training, Resea 61000 2 Yes 997.00 15.60 Details 10010666 Justice Sector Training, Resea 61000 3 Yes 182.50 20.71 Details 10010666 Subaward from The Aaia Foundat 61000 3 Yes 182.50 20.71 Details 10010666 Subaward from The Aaia Foundat 61000 Subtorial 5732.50 Project/Grant 0 Details Project/Grant 0 Department 0 Cost Share 0 Op Unbt/DepfFam Subtorial 57.12 University Accounts Subtorial 87.50 Subtorial 87.50 Subtorial 12.80 Details Total 6800.00	Spectra Accounts The senting of processing of the project Kizent



Zero Earnings

 Occasionally, an effort report will reflect \$0 for a specific project; this typically occurs when correcting entries are posted that zero out earnings previously charged to a project.

Spon	isored Accounts				
	Certified? ♦	Earnings 🛇	Percent of Pay/Computed ☆ Effort	Details	Project/Grant ⇔
1	Yes	12450.00	83.00	Details	10011086 Chemical Functional Group Appr
2	Yes	0.00	0.00	Details	10011098 ISS: Understanding the Gravity

8001326520	06/15/2023	A0000074495	CL040-155400-F1000-202 10011098-	1,250.00
RPAYB02783	11/02/2023	A0000074495	CL040-155400-F1000-202-10011098-	(1,200.00)
RPAYB02799	11/15/2023	A0000074495	CL040-155400-F1000-202-10011098-	(50.00)
8001336455	06/30/2023	A0000074495	CL040-155400-F1000-202-10011098-	1,250.00
RPAYB02783	11/02/2023	A0000074495	CL040-155400-F1000-202-10011098-	(1,200.00)
RPAYB02799	11/15/2023	A0000074495	CL040-155400-F1000-202-10011098-	(50.00)

• In this instance, the PI will remain in the workflow and attests to the fact that it is accurate that the employee did not perform work on the specific award.



Compliance Matters



Regulations to Know

- <u>Code of Federal Regulations</u> (2 CFR 200), known as Uniform Guidance, establishes Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal awards
- Agency-specific guidance (NIH, HHS, NSF, etc.)
- Non-federal grants commonly refer to Uniform Guidance in their agreements, making them subject to the same rules
- University policies and procedures



200.302 – Internal Controls

- Establish and maintain effective internal controls over the federal award that provide reasonable assurance that the award is being managed in compliance with regulations
- Take prompt action when instances of noncompliance are identified

200.306 – Cost Sharing and Matching

- Any shared costs or matching funds and all contributions, including cash and thirdparty in-kind contributions, must be:
 - $\,\circ\,$ Verifiable from the entity's records
 - \circ Not included as contribution for any other award (no double counting)
 - $\circ\,$ Necessary and reasonable for the award



200.403 – Factors Affecting Allowability of Costs

- Costs must:
 - $\,\circ\,$ Be necessary and reasonable for the performance of the award
 - \odot Conform to any limitations or exclusions set forth
 - Be consistent with the policies and procedures that apply uniformly to both federallyfinanced and other activities of the non-federal entity
 - For example, bonuses or additional compensation cannot be based on the amount of remaining funding for an award
 - Not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost
 - We cannot directly charge a grant for something that is already incorporated in our IDC rate
 - For example, generally, we cannot charge electricity or water directly to the grant



200.404 – Reasonable Costs

- A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person
 - $\,\circ\,$ Is it generally recognized as ordinary and necessary for the operation of the entity in performance of the award?
 - $\,\circ\,$ Is it actually needed and used to accomplish the scope of work?
 - \circ Are sound business practices used (e.g., arm's length bargaining, etc.)?
 - \circ What are the market prices for comparable goods and services for the geographic area?
 - Is the entity significantly deviating from its established practices and policies regarding the incurrence of costs which may unjustifiably increase the federal award's costs?
 - Example: The University policy is to replace computers every three years. You received a new federal award and decide to replace a computer that is only one year old.



200.405 – Allocable Costs

- A cost is allocable if the expense is chargeable or assignable in accordance with the relative benefits received.
 - $\,\circ\,$ Is it incurred specifically for the award?
 - $\,\circ\,$ Is it actually needed and used to accomplish the scope of work?
 - $\,\circ\,$ Is it necessary to the overall operation of the entity?
 - Is it assignable? If benefiting both the award and the entity, costs must be distributed in proportion, using reasonable methods to approximate.
- Any cost allocable to a particular award may not be charged to other federal awards to overcome fund deficiencies or avoid restrictions, regulations, or term and conditions of the award.
 - However, if a cost benefits two or more projects, it must be allocated to the projects based on proportional benefit.

Example: You have a federal award that ends on 12/31/23 and has a remaining balance of \$2,000. You decide to purchase a new freezer that will be delivered on 12/22/23.

- Will the award receive the relative benefits of the purchase?
- Will this really be used to accomplish the scope of work for the award?



Agency-Specific Guidance

Example – HHS Grants Policy Statement, Cost Transfers and Overruns

- "Cost transfers by recipients between grants, whether as a means to compensate for cost overruns or for other reasons, generally are unallowable; however, the cost transfers by recipients may sometimes be necessary to correct bookkeeping or clerical errors...".
- "Permissible costs transfers should be made promptly after the error occurs but no later than 90 days following the occurrence unless a longer period if approved in advance...".

• Occurrence = date of original change

 "The transfer must be supported by documentation that fully explains how the error occurred and a certification of the correctness of the new charges. An explanation merely stating that the transfer was made "to correct error" or "to transfer to correct project" is not sufficient".



Applicable Credits

- If you discover erroneous charges have been placed on a grant or award, the 90-day time frame does not apply.
- Errors must always be corrected, regardless of timeframe.
- 2 CFR 200.406 specifically states that the charge needs to be removed and the credit applied as needed.
- However, remember cost overruns are specifically disallowed as an expense on a different grant.



Uniform Guidance – Compensation

2 CFR 200.430 – Compensation – Personnel Services

- Sets the criteria for acceptable methods for charging salaries and wages and requires that institutions follow acceptable methods for documenting the distribution of effort for all project personnel.
 - $\,\circ\,$ Must be reasonable for the services rendered.
 - $\,\circ\,$ Must be consistent with that paid for similar work.
 - Must conform to the established policy of the federal entity and be consistently applied to both federal and non-federal activities.
 - Cannot have "special" rules for federal awards that are inconsistent with University policy.



Why does it matter?

- Salary is the largest expense on all our sponsored awards.
- As a result, it is our **biggest** exposure for risk.
- Uniform Guidance requires internal controls to be in place to support effort expended on federal awards and that the effort be properly documented.
- Effort documentation must provide reasonable assurance that amounts charged are <u>accurate</u>, <u>allowable</u>, and <u>properly allocated</u>.



Legal Ramifications

- Upon completion, effort reports are considered <u>legal documents</u> subject to internal and external audits.
- It is extremely common for effort reports to be requested during audits.
- Do not certify an effort report unless it is correct don't be afraid to ask questions!
- Erroneously certifying effort can be viewed as <u>fraud</u>, which could result in consequences as outlined in the False Claims Act.



Risks of Non-Compliance

- If effort reports are incomplete or incorrect, sponsors may:
 - \odot Disallow expenses and/or require repayment
 - \odot Reduce or eliminate future funding
 - $\ensuremath{\circ}$ Initiate suspension and debarment proceedings
 - \odot Take other available legal remedies
 - Require additional oversight of systems and controls
- Given the University's research mission and status, every effort needs to be taken to comply the respective requirements.

Example: In 2018, NIH issued additional regulations and revoked Duke University's expanded authority after the discovery of research misconduct, which included falsified research and embezzlement of research funds dating back to 2010. **\$112.5 million** was paid back to the government.



What is Considered Time and Effort?

- Effort = "the portion of time spent on a given activity expressed as a percent of total activity for which an individual is employed by the institution".
- Total activity may include but is not limited to teaching, clinical practice, research, preparing proposals, administrative responsibilities, etc.
- Effort <u>must</u> equal 100%.
- It is **<u>not</u>** based on a 40-hour workweek.



Is Payroll the Same as Effort?

NO!

Ρ	ayroll	Effort		
•	Describes the allocation of an individual's salary. Can be expressed as an <u>estimate</u> of actual time	Describes how time was <u>actually</u> spent and allocated to the award(s), regardless of whether it was reimbursed by the federal		
	worked.	sponsor.		
•	Is the basis for generating the effort report.			



Time and Effort Example

- You have two faculty members that are both co-PIs on a large NIH award. Each were proposed to spend 2.25 academic months (for their 9-month appointments), or 25%, on the award.
- Upon being awarded the grant, you set up payroll to charge the grant 25% of each faculty member's salary as outlined in the Notice of Award and grant budget.
- Effort certification is the retrospective confirmation, or after-the-fact certification, that the allocation of an individual's actual time and effort spent on specific activities is correct.
- Effort certification is not just a rubber stamp of the salary/payroll distribution.



Time and Effort Example

Faculty Member 1 averages 40 hours per week as follows:

- 20 hours teaching and administrative duties
- 10 hours on the NIH award
- 10 hours on another grant (Award A)

Faculty Member 2 averages 60 hours per week as follows:

- 20 hours teaching and administrative duties
- 10 hours on the NIH award
- 10 hours on another grant (Award A)
- 8 hours on another grant (Award B)
- 12 hours on another grant (Award C)



Time and Effort Example

- Each faculty member were **proposed** to spend 25% on the NIH award.
- Faculty Member 2 is overcharging the NIH award by almost 10%!
- Uniform Guidance allows reasonable estimates and does not expect perfection; however, estimates should be reviewed and "trued-up" based on actual effort expended.
- Variances greater than 5% should be adjusted.

ACTUAL EFFORT	Faculty Me (averages	ember 1 40 hours/week)	Faculty Mem (averages 60	ıber 2) hours/week)
Teaching and Admin	50%	(20/40)	33.3%	(20/60)
NIH Award	<u>25%</u>	(10/40)	<u>16.7%</u>	(10/60)
Grant A	25%	(10/40)	16.7%	(10/60)
Grant B			13.3%	(8/60)
Grant C			20%	(12/60)
Total Effort	100%	(40/40)	100%	(60/60)



Uniform Guidance

- The federal government recognizes that, in an academic setting, teaching, research, service, and administration are often inextricably intermingled.
- As a result, effort is based on the time necessary to fulfill 100% of activities for which an individual can be compensated, <u>regardless</u> of the number of hours worked.
- Uniform Guidance is purposefully worded and based on "100% effort" to avoid issues that arise with the various pay or appointment types and the possible over-commitment of faculty time.



Salary Cap

- A salary cap is an imposed limit for the total salary rate allowable to be charged for an individual by the sponsor.
- Any amount above the salary cap must be recorded as cost share and will be considered mandatory uncommitted cost share to properly capture total expended effort and cannot be used as effort on another sponsored project.
- This is to prevent the double counting of effort and ensure faculty do not become overcommitted.

See Grants and Funds Management's **Understanding Cost Share** training for more information on cost share.



Salary Cap Example

- Dr. Greyhound's annual institutional base salary is \$300,000 and he has committed (and expended) 10% effort on an NIH grant that has a salary cap of \$212,100.
- Due to the NIH limit, the maximum we can directly charge his NIH grant is \$21,210 (\$212,100 x 10%).
- In order to properly record the effort committed (and expended) on the NIH grant, the remainder must be booked as cost share on the grant.
- Departments and Business Managers must be mindful of the salary cap!

Cost Share Calculation						
Institutional Base Salary	\$300,000 x 10% = \$30,000					
Salary Cap Allowance	\$212,100 x 10% = \$21,210					
Amount to Cost Share	\$87,900 x 10% = \$8,790					

Payroll form would directly charge 7.07% (21,210 / 300,000) and cost share 2.93% (8,790 / 300,000) to the grant to account for the full 10% effort expended



Salary Cap Calculation Template

 To help with salary distribution allocations related to Salary Caps, the Controller's Office has developed the <u>Salary Cap Calculation</u> <u>Template</u> to assist

 \odot There is a tab for 12, 11, and 9-month appointments.

- To use this template, you will need to know:
 - Employee's total salary per pay period (remember bonuses or cash awards are excluded)
 - \odot Sponsor salary cap
 - \odot Total effort percentage committed



Retro Funding Changes and Corrections

- It is imperative that payroll adjustments are processed timely.
- **<u>ANY</u>** salary reallocations or redistributions directly effect time and effort reporting.
- Formal recertification must be completed and should be taken seriously.
- Employees, PIs, and Supervisors are responsible for promptly coordinating with their Business Manager to request any needed changes and corrections.
- Transfers should be made within <u>90 days</u> of the original transaction.
- Please note if an award is ending, the 90-day window is shortened accordingly, and all changes must be posted in a timely manner to comply with close-out requirements.
- Cost transfers are subject to University Policy FINA 3.35 Cost Transfers.



Payroll Retro Funding Changes

• Please ensure you are using the current **Payroll Retro Funding Change form**, which is required for all payroll retro funding changes.

	TO BE COMPLETED BY THE DEPARTMENT										
USC ID:				NAME (Last,	First):		F	PAY GROUP:			
JUSTIFICATION	V/NOTES (Cost	Transfer Justifi	cation Form mus	t be complete	ed and attached if a US	SCSP project is part	of the transaction):				
PAYCHECK	PAYCHECK DATE: Has this paycheck date previously been moved via YES NO										
					unding Change Jour						
				CI	JRRENT DISTRIBUT	ION					
OPER UNIT	DEPT	FUND	ACCOUNT	CLASS	BUSINESS UNIT	PROJECT #	COST SHARE	COMBO CODE	AMOUNT		
			└──── ┤	'							
		L		L'		L	TOTAL DEL				
							TOTAL REI	TRO FUNDING CHANGE	\$ 0.00		
					NEW DISTRIBUTION	N					
OPER UNIT	DEPT	FUND	ACCOUNT	CLASS	BUSINESS UNIT	PROJECT #	COST SHARE	COMBO CODE	AMOUNT		
			,			(

- Be sure to enter **<u>CORRECT</u>** funding chartstrings and corresponding combo codes.
- Entering incorrect information can cause delays or the need to submit additional funding change forms.



Cost Transfers

	Cost Transfer Ju	stification Form					
PURPOSE							
an audit, the information provided belo expenditures involving sponsored proje	This justification form will help ensure compliance with Uniform Guidance along with University policy regarding cost transfers. In the event of an audit, the information provided below will be used to substantiate the adjustment. This form is required for any cost transfers that adjust expenditures involving sponsored project accounts (the USCSP Business Unit). Principal Investigator (PI) certification and approval is required for all cost transfer requests. Once completed, this form needs to be attached with required supporting documentation to the proper request for all cost transfer requests. Once completed, this form needs to be attached with required supporting documentation to the proper request						
COST TRANSFER TYPE							
Payroll Retro Funding Ch JV (payment through ch		Expense Module (payment with) Other	pcard)				
Original (incorrect) chartfield *:							
Correct chartfield *:							
* For payroll retro form	ns, "see retro form" may be liste	d if multiple projects/funds are involved in the reques	t				
JUSTIFICATION							
if this is being moved to a USCSP acc		ason this was originally charged to the					
incorrect sponsored project or accou		ason una mas originairy criangea to the					
3. How will this type of error or situa	tion be prevented from happe	ning in the future?					
CERTIFICATION As Pi, I approve this expense to be ad the award budget as well as allocable		/project(s) listed above. I certify this expense is in a ng the scope of work.	ccordance with				
PI Signature:	Date:	**PI Signature: Date:					
Printed Name:		**Printed Name:					
		** If adjustment impacts more than one PI					

- Any cost transfer, including Payroll Retro Funding Changes, must be accompanied by a Cost Transfer Justification Form if those changes impact sponsored awards.
- This form replaces the need for any justifying memos that would otherwise have been included when requesting transfers.
- This form protects all vested parties by:
 - Ensuring PI review and approval prior to the expenses being moved.
 - Ensuring proper documentation is maintained to avoid audit finding.



University Policy

The University's Time and Effort Reporting policy/procedure requires reports to be certified in a timely manner.

FINA 3.12 Policy

FINA 3.12 Procedure

Specifically, "Time and Effort Reports should be fully certified within 30 days of issuance. Any effort not certified by day 60 is subject to be moved to department funds".

The Controller's Office will monitor report completion and enforce this policy to ensure compliance.

Certification is required to be completed within 30 <u>total</u> days – which encompasses the date of release to the receipt of the final approval (including Employee, PI, and Supervisor approvals).



Review of Certification Process



Who Should Expect a T&E Report?

- A time and effort report will <u>automatically</u> generate for any individual who has salary paid from a sponsored project <u>or</u> cost shared to a project.
 - Direct payroll charges
 - Payroll transfers
 - Late or retroactive payroll adjustments
 - Includes hourly employees (e.g., students, etc.)



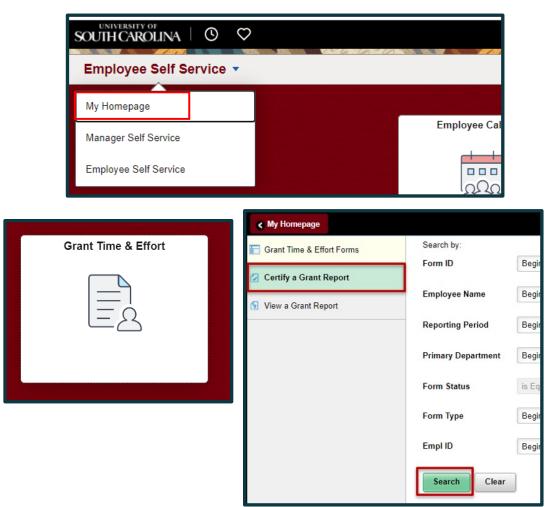
Who Needs to Review and Certify Effort?

- Reports will be reviewed and verified by Business Managers <u>first</u> and then released for certification and approval to the following:
 - \circ Employees, then
 - \circ PIs, and
 - \odot Supervisor last
- The system ensures PIs and Supervisors are part of the certification process.
- Once an effort report is certified by the Employee, applicable PIs, and their Supervisor, the report is considered complete (fully executed).
- Communication is key!



Click the link from the email notification **<u>OR</u>**:

- 1. Log into **PeopleSoft HCM**.
- Navigate to the "My Workplace" or "My Homepage".
- 3. Select the "Grant Time and Effort" tile.
- Select the "<u>Certify</u> a Grant Report" tab to view the effort reports awaiting certification and click "Search".





Time and Effort	Reporting : Time	and Effort Report								
Employee Information										
		Termitiyan I						Empl ID		Once ver the Ackn
		t July - December 2021	CO. MC GOOD							
Rep	ort Period Begin Date						Report Perio	d End Date 12/31/2021		l the Ackn
Hide Chartfields										
Sponsored Accounts										"Yes", ad
Certified? 0	Earnings 🗘	Percent of Pay 🛇	Details	Project/Grant 🗘			Department	Cost Share 0	Op Unit/Dept/Fund/Acct/Class 🗘	
1 Yes	10576.58	18.35	Details	10010490 DHEC-	MCH Proposal Evaluation	10	115011		CL034 115011 G1000 51300 301	l (e.g., Etto
2 No	3381.20	5.87	Details	10010657 RISK I	Physical Activity, Seden		115200		CL034 115200 F1000 51300 202	(0-) =
3 No	14045.98	24.37	Details	10010763 EACH	Mom and Baby Collabora	tiv	115200	ß	CL034 115200 K1000 51300 301	(e.g., Effo "Approve
4 <u>No</u>	9196.00	15.96	Details	10010786 Rural E	order Health Chartbook:		115200		CL034 115200 F1000 51300 202	
5 No	250.00	0.43	Details	10011171 Study o	f the U.S. Institutes f		251001		CL072 251001 F1000 51300 301	
University Accounts	Subtota Percent Subtota	I 37449.76 I 64.98			File Attachments					
					Status		Action	Description \Diamond	File N	ame 🗘
Certified? 0	Earnings \Diamond		Details	Project/Grant 🗘	1		Upload			
1 <u>No</u>	20176.25	35.01	Details		Add					
					Action Items					
					Action items	•				
					Acknowledgement					
					1 No J	p the best of my knowledge and iniversity policies.	belief, I certify that the payroll perce	ntages reasonably reflect my effort and a	re consistent with the work I performed during this reportin	g period. I am aware that filing inaccurate and/or late effort reports may res
					Comments					
					Search Recycle	lold Print App	prove			

Once verified, toggle all Accounts and the Acknowledgement from "No" to "Yes", add any applicable comments (e.g., Effort accurate), and click "Approve".

> Remove Delete

in punitive actions as noted in federal and

1 row

If a report is inaccurate, the employee should promptly coordinate with their Business Manager to initiate the required correction.



Time and Effor	rt Reporting:Results						Form ID 3	88862
You have successfully a	pproved your eForm.							
The eForm has been ro	uted to the next approval step.							
multiple approvers.								
View Approval Route Signature/Action Lo								
Transaction / Signatur	e Log							3 rows
Current Date Time		Step Title	User ID	User Description	Form Action	Time Elapsed		
1 01/28/2022 1:43:15	PM	Saved	PERKINTD	Tiffany Boyd	Save			- 1
2 01/28/2022 1:57:09	PM	Initiated	PERKINTD	Tiffany Boyd	Submit	13 minutes		
3 01/28/2022 2:17:32	PM	Employee Oprid	TORELINE	Hyles form.	Approve	20 minutes		
Action Item Log								2 rows
Acknowledgement	Description					User	Time Stamp	
1 ^{Yes}	To the best of my knowledge, I confirm this report r	reflects all current payroll actions and requests.				PERKINTD	01/28/22 1:57:07.000000PM	- 1
2 Yes	To the best of my knowledge and belief, I certify th punitive actions as noted in federal and University	at the payroll percentages reasonably reflect my effo policies.	rt and are consistent with the work I perforr	ned during this reporting period. I am aware that filing ina	ccurate and/or late effort reports may result in	10HEBA	01/28/22 2:17:28.000000PM	
Print								



Cancel	Approval	Done
Employee Stage		
▼G3FORM_ID=388862	Awaiting Further Approval	5
Basic Path Approved Employee Oprid 01/28/22 2:17 PM		
Parallel Stage		
Parallel Stage G3FORM_ID=388862, PROJECT_ 	ID=10010490 Pending	,
_		

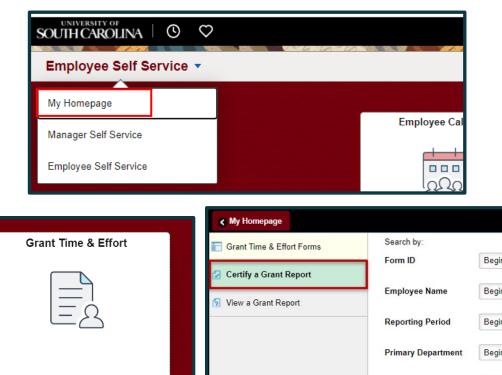


Walkthrough – Principal Investigator (PI)

Click the link from the email notification **OR**:

- 1. Log into **PeopleSoft HCM**.
- Navigate to the "My Workplace" or "My Homepage".
- 3. Select the "Grant Time and Effort" tile.
- 4. Select the "<u>Certify</u> a Grant Report" tab to view the effort reports awaiting certification and click "Search".

If a PI receives a report for an employee that did not work on their award(s), they need to email their Business Managers promptly to initiate a resolution.





Form Status

Form Type

Empl ID

Search

is Ec

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Begin

Clear

Walkthrough – Principal Investigator (PI)

\checkmark	Time and Effort Reporting : Time and Effort Report									
Emplo	mployee Information									
		Employee Name	insityin i				Empl ID			
		Primary Department	00000	0.0000	Millo					
		Reporting Period Ju	uly - December 2021							
	Re	eport Period Begin Date 0	7/01/2021				Report Period End Date 1	2/31/2021		
Hide	e Chartfields									
Spons	ored Accounts									
										5 rows
	Certified? 0	Earnings 0	Percent of Pay 🛇	Details	Project/Grant 🗘	•	Department ◊	Cost Share ◊	Op Unit/Dept/Fund/Acct/Class 🛇	
1	Yes	10576.58	18.35	Details	10010490 DHEC-MCH Proposal Evaluation o		115011		CL034 115011 G1000 51300 301	
2	Yes	3381.20	5.87	Details	10010657 RISK Physical Activity, Seden		115200		CL034 115200 F1000 51300 202	
3	Yes	14045.98	24.37	Details	10010763 EACH Mom and Baby Collaborativ		115200		CL034 115200 K1000 51300 301	
4	Yes	9196.00	15.96	Details	10010786 Rural Border Health Chartbook:		115200		CL034 115200 F1000 51300 202	
5	Yes	250.00	0.43	Details	10011171 Study of the U.S. Institutes f		251001		CL072 251001 F1000 51300 301	

If a report is inaccurate, the PI should promptly coordinate with their Business Manager to initiate the required correction.

- If the employee is active, the report should come to the PI with all lines toggled to "Yes", as they have completed their employee certification. The PI will then reconfirm their project is correct by leaving it toggled to "Yes".
- If an employee is inactive, the PI may have to toggle the applicable project line from "No" to "Yes" to confirm.
- The PI will only have access (and responsibility for) the lines on the report where they are listed as the Principal Investigator.



Walkthrough – Principal Investigator (PI)

Once verified, toggle the Acknowledgement from "No" to "Yes", add any applicable comments (e.g., Effort accurate), and click "Approve".

File Attachments				
				1 row
Status	Action	Description \diamond	File Name ♢	Remove
1	Upload			Delete
Add				
Action Items				
Acknowledgement	elief, I certify the employee's payrol	percentages reasonably reflect their effort on award() and are consistent with the work performed during this reporting period where I am the Prir	1 row rcipal Investigator. I am aware that filing inaccurate and/or late effort reports
may insult in punitive actions as n	oted in federal and University policie	3.		
Comments				
Search Recycle Hold Print App	ove			



Click the link from the email notification **<u>OR</u>**:

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UNIVERSITY OF SOUTH CAROLINA	0 0	
Employee Self Se	ervice 🔻	
My Homepage Manager Self Service Employee Self Service		Employee Cal
Grant Time & Effort	 My Homepage Grant Time & Effort Forms Certify a Grant Report View a Grant Report 	Search by: Form ID Begin Employee Name Begin Reporting Period Begin Primary Department Begin Form Status is Eq Form Type Begin Empl ID Begin



\bigcirc	Time and Effort Reporting : Time and Effort Report								
	Employee Name Primary Department					Empl ID			
Re Hide Chartfields Sponsored Accounts	Reporting Period July - December 2021 Report Period Begin Date 07/01/2021 Report Period End Date 12/31/2021								
Certified? 0	Earnings 🌣	Percent of Pay 🛇	Details	Project/Grant 0		Department 🌣	Cost Share 0	Op Unit/Dept/Fund/Acct/Class 🛇	
Yes	10576.58	18.35	Details	10010490 DHEC-MCH Proposal Evaluation	0	115011		CL034 115011 G1000 51300 301	
2 Yes	3381.20	5.87	Details	10010657 RISK Physical Activity, Seden		115200		CL034 115200 F1000 51300 202	
3 Yes	14045.98	24.37	Details	10010763 EACH Mom and Baby Collaborati	v	115200		CL034 115200 K1000 51300 301	
4 Yes	9196.00	15.96	Details	10010786 Rural Border Health Chartbook:		115200		CL034 115200 F1000 51300 202	
e Yes	250.00	0.43	Details	10011171 Study of the U.S. Institutes f		251001		CL072 251001 F1000 51300 301	
University Accounts	Subtotal Percent Subtotal	37449.76 64.98							
	_								
Certified? 0	Earnings 🌣	Percent of Pay \Diamond	Details	Project/Grant 0	Department ◇	Cost Share ◊	Op Unit/Dept/Fur	nd/Acct/Class ◊	
Yes	20176.25	35.01	Details		115202		CL034 115202 A0	001 51300 101	

If a report is inaccurate, the supervisor should promptly coordinate with their Business Manager to initiate the required correction

- If the employee is active, the report should come to the Supervisor with all lines toggled to "Yes", as they have completed their employee certification. The PIs have also approved the Sponsored Accounts section, leaving the Supervisor responsible for reconfirming the University Account section only.
- If an employee is inactive, the person designated as the employee's primary supervisor will be responsible to toggle any needed lines from "No" to "Yes" on behalf of the inactive employee.



Once verified, toggle the Acknowledgement from "No" to "Yes", add any applicable comments (e.g., Effort accurate), and click "Approve".

File Attachments				
				1 row
Status	Action	Description \Diamond	File Name 🛇	Remove
1	Upload			Delete
Add				
Action Items				
Acknowledgement	belief, I certify the employee's payroll	percentages reasonably reflect their effort on award() and are consistent with the work performed during this reporting period where I am the Princ	1 row
may r sult in punitive actions as n	oted in federal and University policies	,		
▶ Comments				
Search Recycle Hold Print Appr	rove			



Dor
Approved
Approved
Approved

At this point, the effort report is considered complete and will fully execute in the system!



Training and Contacts



Office of the Controller Website

Our website was recently redesigned to provide a more user-friendly experience. The Resource and Training Toolbox was created to consolidate training resources in one location.



Navigate to the **<u>Compliance Management</u>** page or Time and Effort Reporting sections within the toolbox for applicable resources.



Job Aids

Various job aids are available based on role:

- <u>Time and Effort Report Employee Job Aid</u>
- <u>Time and Effort Report Principal Investigator Job Aid</u>
- Time and Effort Report Supervisor Job Aid

These job aids can be found in the Time and Effort Reporting sections on the **Business Manager** and **Principal Investigator** pages within the Resource and Training Toolbox.



Questions / Issues

If you have questions or experience any issues, please contact the Compliance Team at **timeandeffort@sc.edu**.

Lindsey Cox – Director of Compliance and Tax Faye Parks – Senior Compliance Manager



THANK YOU!

Office of the Controller



Address:

1600 Hampton Street Columbia, SC 29208



Contact Number: Phone: 803-777-2602 Fax: 803-777-9586



Email Address: controller@sc.edu





Alone, we can do so little; together, we can do so much.

