

# **Sponsored Programs Accounting: Effort Reporting and Extra Compensation**

# 27<sup>th</sup> NSPAA Annual Technical Assistance Workshop

Virginia Beach, VA Wednesday, June 7, 2023

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Central State University

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Director, Office of Sponsored Programs and
Research
Central State University



#### **AGENDA**

- Background
- Effort Reporting
- Supplemental Compensation
- Summary



#### **Background**



- Predominantly Undergraduate Institution
- Ensure Compliance
- Reduce Administrative Burden
- Heavy Teaching Load
- Incentivize Research and Scholarly Activities



• Method of certifying to sponsors that the effort spent on externally funded activities reasonably reflects the salary and wages or time charged to an award.



# **Effort Reporting: Who Reports?**

 Every individual who devotes effort to sponsored activities, whether paid or unpaid.



■ The <u>Uniform Guidance Subpart E §200.430</u>: Standards for documentation of personnel expenses.



- Reasonable: What is your institution's degree of tolerance?
- Conforms to established written policies of non-Federal entity
- Includes both externally funded and institutional activities



- Official records: Appointment documents/job descriptions
- Determined and supported by internal controls that provide assurance that the charges are accurate, allowable, and properly allocated: Payroll systems/general ledger



### **Comprehensive Effort Reporting**

PROPOSAL NOA

**EFFORT** 

**PAYROLL** 

**CERTIFICATION** 

OSP&R

Proposal budget outlines effort and becomes part of the Notice of Award

Distribution/appointment to award in general ledger

Executed payroll with labor distributions that segregate sponsored activities

Employee reviews and certifies effort is a reasonable reflection of work completed on sponsored activities

Compliance area reviews and adjusts if necessary to ensure accuracy

# **Effort Reporting: How?**



#### CENTRAL STATE UNIVERSITY

#### QUARTERLY MONTHLY TIME AND EFFORT FORM ON EXTERNALLY FUNDED PROGRAMS

OCTOBER 2022 THROUGH DECEMBER 2022

NAME:	Bobbie Bowling		
		CHECK ONLY ONE BELOW	
Full Time: Part Time:	<u>x</u>	Supplemental Status: Overtime Status:	In-kind: Cost Share:

Month	Fund Number	Position	Total Percentage of Effort
	lgs138	Interim Associate Provost	25.00%
	lgf212	Interim Associate Provost	12.50%
Oct-22	lgs212	Interim Associate Provost	12.50%
Oct-22	0000	Interim Associate Provost	50.00%
			0.00%
		100.00%	
	lgs138	Interim Associate Provost	25.00%
	lgf212	Interim Associate Provost	12.50%
Nov-22	lgs212	Interim Associate Provost	12.50%
	0000	Interim Associate Provost	50.00%
			0.00%
		100.00%	
	lgs138	Interim Associate Provost	25.00%
Dec-22	lgf212	Interim Associate Provost	12.50%
	lgs212	Interim Associate Provost	12.50%
	0000	Interim Associate Provost	50.00%
			0.00%
		Total	100.00%

#### WORK PERFORMED

Training for LG both extension and research funds, closeout for Evans Allen LG. CAYUSE implementation for COI, SP, proposals, IRB. Multiple proposal submissions as well as post-award review of billings and collections RFTs, budgets, 425s, sibrecipients, proposal contracts, etc.

Morakinyo Kuti

Supervisor:

-

Employee Signature:

I certify that this distribution of time and effort represents a reasonable estimate of the effort (time) expended by this employee during the period covered by this report.

### **Effort Reporting: How?**



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### **Effort Reporting: Why?**

- Salaries and wages: Largest direct cost under federal grants (66%).
- Fines, penalties, and repayment.
  - ✓ Northrop Grumman Corporation, \$27.45 million, 2018
  - ✓ Texas A&M Research Foundation, \$750,000, 2018
  - ✓ University of North Texas Health Science Center, \$13 million, 2018
  - ✓ Telehealth Holdings LLC, \$500,000, 2016
  - ✓ University of Florida, \$19.875 million, 2015



 Extra Service Pay normally represents overload compensation, subject to institutional compensation policies for services above and beyond Institutional Base Salary (IBS).



### **Institutional Base Salary**

- Compensation for time and effort spent on research, teaching, service or other activities, as documented in a faculty's appointment letter.
  - Academic year for faculty
  - ✓12-month period for staff



#### **Conditions**

- Consistent written policies which apply uniformly to all employees, not just those working on Federal awards.
- Consistent written definition of work covered by IBS specific, work level, appointment letters, contract with job description, and other documentation.



#### **Conditions**

- Commensurate with the IBS rate of pay and the amount of additional work performed.
- Within the salary structure and pay ranges.
- Subject to the Standards of Documentation as described in Section 400.300.



- Effort clearly stated in proposal as supplemental compensation
- Usually limited to portion of effort
- Unavailable outside academic period



- Overtime for hourly employees is not supplemental.
- Overtime is allowable without prior approval if employees earn overtime on institutional funds.
- Overload teaching does not require approval.

#### OFFICE OF SPONSORED PROGRAMS AND RESEARCH

PO BOX 1004 \* WILBERFORCE OH 45384-1004 \* (937) 376-6269 \* FAX (937) 376-6598

October 11, 2017

Bruce Mertz Team Leader, Team I Awards Management Division

Dear Mr. Mertz,

Central State University requests approval from NIFA to pay supplemental salary to CSU faculty and staff from Capacity Building Grants (CBG). The applicable awards are listed below:

TITLE	PRINCIPAL INVESTIGATOR	AWARD NO.
A Potential for Building and Strengthening Capacity and Advancing the Quality of Teaching and Extension at CSU	Ibrahim Katampe	2015-38821-24362
Strengthening Agricultural Geospatial Education and Research at CSU	Xiaofang Wei	2017-38821-26419
Role of Water Quality in Sustainable Food Production on urban Landscapes	Krishnakumar Nedunuri	2017-38821-26411

CSU employees can earn supplemental pay from internal and external sources. This request is consistent with CSU's supplemental salary policy (617) as stated below.

Subject: STAFF SUPPLEMENTAL COMPENSATION FOR WORK WITHIN THE UNIVERSITY

The contract salary paid by the University to full-time, non-bargaining unit staff represents full payment for all job activities performed for the University. It is not unusual for staff to work in excess of the University's standard forty-hour work week, without receiving or having the expectation of receiving additional remuneration. However, staff may be requested to render services for other units of the University and/or to perform duties that are outside the scope of the individual's position. In such cases, the employee may be eligible to receive supplemental compensation if release time is not a feasible option.

#### Article 37 of the University's Agreement with faculty which states

Supplemental Compensation: Supplemental Compensation for grants and contracts during the academic year will be the amount provided by the Agency but in no case will it exceed 25%.



In all cases, employees must document that the additional work occurred above their regular duties through submission of a time and effort report describing when the work was performed. The time and effort forms are submitted on a monthly basis and supplemental pay may be denied if an employee does not fulfill the work requirement.

Thanks for your assistance in this matter.

Sincerely,

Morakinyo A.O. Kuti, CRA, CFRA

Director

#### United States Department of Agriculture National Institute of Food and Agriculture AWARD FACE SHEET

1. Award No.	2.Amendment No.	3. Proposal Number	A Period of Pe	rformance	5. Type of Ins	trument	
2015-38821-24362	2	2018-00532		4. Period of Performance 5. Type of Instrument 09/01/2015 through 08/31/2018 Grant		and the second	
6. Type of Action	7. CFDA Number	8.FAIN		9. Method of Pa	vment	10. CRIS Number	
Revision	10.216	20153882124362		ASAP 388212436	-	1007327	
1.Authority:	10.210	20133002124302		71071 000212100	20002110000	100/32/	
	17(b)(4) of P.L. 95-113	, as amended, 1890 Cap	acity Building Gran	ts			
12. Agency (Name and Address) Awards Management Division				13. Awardee Organization Central State University			
National Institute of F	Food and Agriculture/U	ISDA		Wilberforce, OH 45384-1004			
Washington, DC 20:	250-2271						
4 D D-i-4-60			45 Dec	inat Director/Derfor	mina Oraznizatio		
4. Program Point of C		ninistrative Point of Con					
Antonio McLaren		ne J. Gates	Ibrahim Katampe Central State University				
Telephone: 202-720-		phone: 202 720-3512	Wilberforce, OH 45384-1004				
amclaren@nifa.usda	a.gov sgate	es@nifa.usda.gov					
6. Funding:	Federal	Non-Federal	17. Funds Cha	rgeable			
Previous Total	\$599,997.00	\$0.00	FY - FDC	Amount	FY - FDC	Amount	
+ or -	\$0.00	\$0.00	15- 562-38			ranount	
Total	\$599,997.00	\$0.00	10- 302-30	30.00			
Total	4000,001.00	\$0.00					
	\$599,99	7.00					
Grand Total	9000,00	7.00					
8. Title of Proposal							
A Potential for Buildi	ng and Strenghening C	Capacity and Advancing t	he Quality of Teach	ing and Extension at	Central State Un	iversity	
		PF	ROVISIONS				
This Award incorpo	rates the following:						
1. The request cor	ntained in the letter of	dated 10/11/2017 has	been reviewed by	this office and the	NIFA cognizar	t program official.	
	request as indicate						
<ol><li>Authorization to</li></ol>	pay supplemental s	salary to CSU faculty b	ased on establish	ned University poli	cy.		
		ace Sheet dated 9/17/					
	•	ng this action, please o	contact the Admin	istrative Point of C	ontact listed ab	ove.	
Co-Project Director(	s):						
Rajeev Swami (Cen	tral State University)						
his award subject to the	o provinione above at			RTMENT OF AGRIC		may be terminated with a	
		nall constitute an obligation es the timely drawdown o					
				The case		and the district dist	
Typed Name Bruce Mertz		Signat			Date		
Authorized Depart	mental Officer	BME	RTZ		10/18	/2017	



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#### **SUMMARY**

- Productive research administrative environment.
- Effort reporting required under federal guidelines.
- Represents a reasonable estimate of effort.
- Must be reviewed and adjusted as necessary to ensure accuracy.



#### **SUMMARY**

Supplemental compensation rewards active faculty.

Supplemental compensation mitigates PUI challenges.



#### **THANK YOU!**

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