

ACADEMIC AFFAIRS POLICY

Policy Title: **FEDERAL GRANT EFFORT CERTIFICATION**

Policy Number: 2.7.1.1

Campus: ☐ Lisle ☐ Mesa ☒ Both

Policy Status: ☒ New policy ☐ Continuing/active policy ☐ Archive policy

Supersedes: not applicable

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Associated Division(s): Academic Affairs

Responsible Office(s): Office of Institutional Effectiveness

Name(s) of Designated Policy Owner(s): Tim Marin

Approved By:

- **University Planning Council Subcommittee on Policies:**
Tim Marin, Ellen Ziliak 2/16/2026
- **President:**
Joseph Foy 9/11/2026

1. Purpose

The purpose of this policy is to ensure Benedictine University's full compliance with federal requirements governing the certification of effort on federally sponsored grants. Effort reporting is a key mechanism for demonstrating stewardship, integrity, and accountability in University-sponsored research. Consistent with Benedictine values of responsibility and community, accurate effort certification promotes proper use of public funds, transparency in grant management, and alignment with sponsor expectations.

This policy ensures compliance with applicable federal regulations, including the Office of Management and Budget (OMB) Uniform Guidance.

2. Scope

This policy applies to all exempt and non-exempt Benedictine University employees at the Lisle and Mesa campuses—faculty, staff, administrators, and other personnel—who:

- Receive salary support from federally sponsored awards; or
- Contribute effort to federally sponsored projects as committed cost sharing.

Effort reporting is required for all employees who receive salary support or contribute effort to federally sponsored projects, regardless of whether the effort is reimbursed by the sponsor.

3. Definitions

- **Effort:** The total professional activity for which an employee receives compensation from the University, encompassing teaching, advising, research, service, administration, and other assigned duties. Effort is expressed as a percentage of total compensated activities. 100% effort is not defined as a set number of hours per week (e.g., 40 hours) and is not tied to a percent appointment. Instead, effort reflects all compensated professional activity, regardless of the number of hours worked. In academic settings, teaching, research, service, and administrative duties are often intermingled, and effort reporting must reasonably reflect this blended nature of faculty work.
- **Effort Report:** A document certifying an employee's actual percentage distribution of effort on sponsored and non-sponsored activities during a specific reporting period. Effort reports must reflect a reasonable estimate of actual effort, expressed as percentages that collectively total 100% of the employee's compensated professional activities.
- **Payroll Distribution:** A record of how an individual's salary is charged across accounts. This may differ from actual effort and therefore must be validated via effort reports. Payroll distributions indicate how salary is charged, while effort reports reflect the actual proportion of time spent on sponsored and non-sponsored activities. These may differ and must be reconciled through the effort reporting process.
- **Principal Investigator/Project Director (PI/PD):** The individual with primary responsibility for directing a sponsored project, ensuring compliance with sponsor and University requirements.
- **Cost Sharing:** Effort or other resources contributed to a sponsored project that are not reimbursed by the sponsor, including mandatory or voluntary committed cost sharing. When actual effort devoted to a sponsored project exceeds the level budgeted in the award, the additional uncompensated effort is considered voluntary uncommitted cost sharing and is not charged to the sponsor.
- **Exempt Employee:** An employee classified under the Fair Labor Standards Act (FLSA) as exempt from overtime provisions because they meet defined criteria related to job duties and salary basis. Exempt employees certify effort in terms of percentage of total professional activity rather than hours worked.

- **Non-Exempt Employee:** An employee classified under the FLSA as eligible for overtime compensation. Non-exempt employees track and certify effort based on actual hours worked and complete Personnel Activity Reports (PARs) for sponsored projects.

4. Policy Statement

Benedictine University requires accurate, timely, and verifiable certification of effort for all individuals working on federally sponsored projects. Effort certification is mandatory for compliance with federal regulations and is a condition of receiving and maintaining sponsored funding. Effort certification is an element of performance accountability for Principal Investigators/Project Directors, who must ensure that effort expended aligns with sponsor commitments and University policy.

All effort reports must:

- accurately reflect actual effort expended;
- be completed by the individual performing the work;
- be verified by the PI/PD and appropriate supervisory personnel;
- align with federal uniform guidance and University grant management practices; and
- be submitted within established deadlines.

All mandatory and voluntary committed cost sharing must be included in effort reports and verified through the effort certification process. Failure to comply may result in corrective actions, reallocation of salary, disallowed costs, or other sanctions required by sponsors or University policy.

5. Procedures

5.1 Award Initiation

Upon receipt of a federally sponsored award:

1. The PI/PD prepares a projected distribution of effort for all personnel based on the approved budget.
2. The projection is completed in consultation with the Director of Institutional Effectiveness.
3. The Office of Institutional Effectiveness provides the projected effort distribution to the Business and Finance Office along with award documentation.

5.2 Reporting Schedule

- Exempt employees working on federally funded projects must complete effort reports at the end of each calendar quarter (submitted no later than 30 days after quarter end).

- Non-exempt employees must complete Personnel Activity Reports (PARs) that certify actual hours worked on sponsored projects for each reporting period.

5.3 Distribution and Completion

1. Effort percentages should be based on a reasonable estimate of the average time devoted to a project over the reporting period, not short-term fluctuations in workload.
2. Brief periods of unusually high or low activity should be averaged across the quarter to produce an accurate overall estimate.
3. Exempt employees should not assume a standard 40-hour workweek; effort should be based on the actual average workload for the reporting period.
4. Short-term absences such as sick days or inclement weather do not significantly affect effort calculations. Long-term disability leave and FMLA leave should be included when calculating average effort over a quarter.

The Office of Institutional Effectiveness:

- Distributes effort reports to exempt employees and PARs to non-exempt employees, and
- Ensures forms reflect the appropriate reporting period.

Each employee:

- Completes the effort form, accurately reporting percentage effort, and
- Signs their own effort report.

5.4 Verification

The PI/PD must verify all effort reports for personnel working on their sponsored project(s).

Verification must be completed by:

- PI/PD for all project personnel;
- Department Chair if the PI/PD is certifying their own effort;
- Dean if the PI/PD is a Department Chair.

PI/PDs must retain a copy of each certified effort report within their internal grant files and submit signed originals to the Business and Finance Office. The Business and Finance Office retains all certified effort reports. Individually reported data will be made available only to authorized auditors or officials with legitimate institutional need.

5.5 Salary Adjustments and Corrections

If effort does not align with payroll distribution:

- The PI/PD must notify the Business and Finance Office of necessary salary reallocations or corrections.
- Adjustments must comply with the approved grant budget and University procedures.

6. Related Policies and Documents

- Benedictine University Policy on Policies
- Benedictine University Grants Policy
- 2 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- 2 CFR 215 – Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations (OMB Circular A-110)
- 2 CFR 220 – Cost Principles for Educational Organizations (OMB Circular A-21)

7. Related Forms

- Federal Grant Effort Certification Report (Exempt Employees)
- Federal Grant Personnel Activity Report (Non-Exempt Employees)