

# What's New in the Revised Effort Reporting Policy (2.126)

as of July 29, 2025

## 01

### Escalation Process for Non-Compliance

A detailed escalation process has been introduced for pre-reviewers and certifiers who fail to complete effort forms on time.

- **Pre-Reviewers:** Escalation begins at Day 91 and progresses through four levels, ultimately involving the Dean and VPRA by Day 151. Consequences include grant holds and formal warnings.
- **Certifiers:** Similar four-level escalation, with final actions including salary removal from federal awards and funding restrictions by Day 211.

## 02

### Clarified Roles & Definitions

- **Pre-Reviewer:**
  - responsible for ensuring that each effort form under their purview reflects the work performed to the best of their knowledge.
  - Typically, someone in the RAS post-award team.
- **Certifier:**
  - ensures that the time spent on each sponsored project is accurately reflected on the effort form.
  - Typically, the PI or the person being paid on the grant.
- **Department Coordinator (DC) and Division Head (DH):** Oversees departmental and school-level compliance.
- **Central Administrator (CA):** Oversees the entire effort reporting system.

## 04

### Expanded Definitions & Clarifications

- **Delinquent Effort** Forms are now explicitly defined.
- Clarified that **effort** includes all compensated professional activity under Institutional Base Salary (IBS), and excludes VA, CHOA, consulting, and bonuses.

## 03

### Updated Effort Reporting Timeline

- The revised policy clarifies that the 90-day certification deadline begins from the **availability** of the effort form, not just the end of the effort period.
- This change aligns internal deadlines with federal expectations and ensures timely cost transfers and reporting.

## What Remains the Same:

- Effort Reporting System: Still web-based and after-the-fact.
- Semi-Annual Certification Periods: September–February and March–August.
- Committed Effort Limits: Faculty may not exceed 95% effort on sponsored projects; 100% effort is only allowed in rare, sponsor-approved cases.
- Salary Caps and Cost Sharing: Remain aligned with federal (e.g., NIH, NSF) guidelines.
- K Awards, VA Appointments, and Summer Salary Rules: No substantive changes.

## Key Takeaways:

- Act Promptly: Delays in effort certification now trigger a formal escalation process with real consequences.
- Know Your Role: Whether you're a PI, pre-reviewer, or administrator, understand your responsibilities and deadlines.
- Stay Informed: Refer to the updated definitions and timelines to ensure compliance and avoid audit risks.