This document revises and clarifies the established policy for recording and reporting employee time and effort in accordance with Office and Management and Budget (OMB) Circular A-21 “Principles for Determining Costs Applicable to Grants, Contracts, and Other Agreements with Educational Institutions.” This applies to all regular University staff and faculty, including those whose compensation is charged in whole or in part to externally sponsored projects of any type. More specifically, this policy applies to federal and non-federal sponsored projects, including those supported by awards made by PASSHE, for which time and effort are compensated or are part of an in-kind match. Grants from private foundations are excluded from this policy.

Any questions regarding the kinds of grants subject to this policy should be directed to the Director of Foundation and Government Support.

Time and Effort Reports are available at the Office of Foundation and Government Support website (www.millersville.edu/development/grants).

An FAQ page is maintained here.

Documenting Time and Effort

Millersville University has adopted an after-the-fact reporting system to document time and effort. The reports reflect the percentage of time each employee spent on all grants and contracts compared to their total time and effort. While effort reporting is not based on a 40-hour work week, the number of hours implicit in an individual’s 100 percent effort must be reasonable and supportable to the department, school, university and external reviewers. Effort is expressed in percentages on the Time and Effort Report and must total 100 percent. These mandatory reports are subject to federal auditing. Please keep in mind that whether or not you support the concept of effort reporting, it is a federal requirement and a current focus of federal auditing. Non-compliance has resulted in multi-million dollar fines at major research institutions.

Frequency of Reports

Time and Effort Reports must be completed for each of the sponsored projects where time and effort is committed and for which the faculty or staff member:

1. Is requesting compensation, or
2. Is providing their time and effort as part of an in-kind match.
Time and effort reporting is not required for those conducting grant-funded research for which no compensation is being paid, or for which effort was not provided as an in-kind match.

Faculty engaged in grant funded research and who are not required to complete Time and Effort Reports may volunteer to submit bi-weekly or monthly reports. These reports may benefit the University in attempts to quantify how much time, in addition to teaching, faculty spend on other University responsibilities, including administration and scholarship.

Importantly, to receive compensation for any grant-funded project, the faculty or staff member requesting compensation must complete a Time and Effort Report for the periods for which they are requesting compensation. For faculty or staff receiving grant-funded compensation, Time and Effort Reports can be completed bi-weekly or monthly depending on the frequency with which they wish to receive compensation. For faculty engaged in a grant-funded project and receiving release time, Time and Effort Reports should be completed monthly.

**New Rules Regarding the Submission of Time and Effort Reports**

Compensation for grant funded research or other activities will not be issued until a completed and certified Time and Effort Report has been received by the MU Payroll Office. Completed reports are due at least monthly, but may be turned in bi-weekly if more frequent compensation is desired. Questions regarding the timing of compensation should be directed to the Director of Payroll. Reporting forms are available online for download and can be returned either electronically or in hard copy.

**Certification of Report**

The employee signature on the report confirms that the distribution of time and effort reported represent a reasonable estimate of the amount of time worked during the reporting period. The PI, the Department Chair, Dean or, if staff, the appropriate supervisor must also verify the information provided on the report. The completed form should then be sent electronically or in hard copy to the Office of Foundation and Government Support where it will be reviewed and certified. Once certified, the form will be shared with the Payroll Office, and compensation issued. Completed reports will be kept on file at the Office of Foundation and Government Support and the Payroll Office.