# Refresher Training in PI Effort Monitoring

Presented by Project Accounting

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#### **Overview**

- NSF OIG's audit on faculty effort compliance
- Changes made to policies and procedures
- Implementation of new reports
- Voluntary committed cost sharing

# NSF OIG Recommendations for PI Effort Monitoring

- Effort pledges made by Pls in proposal narratives and not directly charged be considered as voluntary committed cost sharing
- Payroll Distribution System to reflect mandatory and voluntary effort commitments
- Voluntary committed cost sharing resulting from PI effort tracked, documented and reported

#### Caltech's New Policies and Procedures

- Commitment on effort on federally sponsored awards
  - Pls propose effort commitment on federal awards
  - Divisional Approval Form (DAF) includes verification of effort commitment
- Oracle Grants Management updated to include PI effort commitment module
  - OSR records budgeted effort (direct charged and cost shared) in OGM
- Implementation of cost sharing companion awards to track after the fact effort cost sharing

#### Links to policies

- http://www.researchadministration.caltech.edu/documents/167policy\_regarding\_commitment\_of\_effort\_in\_federally\_sponsored\_awards\_3-1-09.pdf
- http://researchadministration.caltech.edu/documents/38-policy\_payroll\_distribution.pdf
- http://researchadministration.caltech.edu/documents/37-policy\_costsharing.pdf

## Tools for Tracking Effort-Cognos & OGM Reports

- Inception to Date Commitment Balance Report
  - Shows committed effort (both direct charged and cost shared)
  - Shows salary charged to main and cost share awards
  - Shows effort distribution status including significant reductions
- Effort Commitment Scheduling Report
- Payroll Distribution Certification (PDC)

### **ITD Commitment Balance Report**

- ITD Commitment Balance Reports
  - Provides key data to ensure PIs fulfill both direct and cost shared commitments
  - For <u>reductions</u> in effort:
    - Contact OSR for sponsor approval for reduction over 25% of committed effort
      - OGM commitment is updated to reflect (approved) revised effort
    - Formally document reduction of less than 25% of committed effort
      - Set up cost sharing companion award to account for the difference between committed and direct charged effort

### Effort Commitment Scheduling Report & Modified PDC

- Effort Commitment Scheduling Report
  - A comprehensive overview of effort commitment and currently scheduled labor distribution
  - To be utilized to modify labor distribution to compliment committed effort
  - To be run periodically to monitor scheduled effort
- Payroll Distribution Certification
  - PDC (Faculty) reports modified to include effort commitment for information purposes only

### **Voluntary Committed Cost Sharing**

- Cost sharing occurs when effort committed does not have corresponding salary charge to the resulting award
- Cost sharing of this nature is considered voluntary committed cost sharing (VCS)
- Caltech's policy on VCS
  - Cost sharing needs to be tracked, documented and reported
  - Cost shared salary is funded by non-federal, gift & endowment or GB funds
  - F&A is funded by PI's discretionary award

### **Voluntary Committed Cost Sharing**

- Notification from Project Accounting
  - Set up ZOACS companion award
  - Link ZOACS to the project of the sponsored PTA
  - Use same burden schedule as the main award
  - Use "CIT Cost Share" for funding source name
  - Provide two funding sources to fund:
    - Salaries and associated benefits charged to ZOACS (from non-federal account)
    - Overhead charged to ZOACS (from PI's discretionary account)
  - Prepare LDAs or allocate labor in ZOACS award

### **Questions**