Effort Reporting System (ERS) Forum
May 5 and 6, 2010

Agenda

- Effort Reporting at UCLA (Marcia Smith)
- Effort Reporting Basics (Evelyn Balabis)
- System Updates & ERS Metrics Demo (Gloria Su)
- How to Get Started in ERS (Raellen Man)
- Using the ERS PAR Detail Report (Raellen Man, Annette Klufas)
- ERS Best Practices (Cathy Rujanuruks)
- Challenges to 100% On-Time Certification (Shannon McGarry, Annette Klufas, Connie Brown)
- Q&A

Effort Reporting at UCLA

- Effort Reporting Challenges
  - Low completion rates, multiple re-certifications and re-opening of reports leads to audit and compliance risk
  - Inconsistent training and education available to faculty and staff at the department level
  - Issues with the ERS system led to frustration on campus
  - Poor understanding of effort reporting concepts
- UCOP Focus on Effort Reporting System-Wide
  - Working on faculty training for effort reporting
  - Requesting metrics on completion and compliance from each campus
  - Consequences statement recently drafted of escalation procedures in instances of non-compliance with effort reporting completion
**Effort Reporting Metrics**

- **Completion Rates at UCLA**
  - ~80% overall completion rate

- **Open Reports**
  - Currently 24,788 open reports as of 4/23/10
  - 12,243 of these reports are overdue back to Spring 2006
  - 1,935 reports are in Certified/Adjustment Required status

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**Effort Reporting Metrics**

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**Risks of Non-Compliance**

- **Impact to the Institution:**
  - Susceptible to False Claims Act allegations
  - Departments may owe direct cost refunds to the sponsor
  - Sponsor may reduce or eliminate future funding
  - Adverse publicity

- **Impact on the Individual:**
  - Susceptible to False Claims Act allegations
  - Possible criminal charges
  - May lose access to current funding

- **Negative audit findings**
Risks of Non-Compliance

- Yale University (2008)
  - Government alleged that Yale overcharged Federal awards through improper cost transfers used to "spend down" grant funds which resulted in inaccurate and overstated effort reports.
  - Government alleged that Yale researchers inaccurately certified 100% of effort on funds, when a significant amount of work was spent on other projects.
  - Government alleged that a PI did not dedicate 25% of effort on project, as proposed in subaward budget.
  - $7.6 million paid to the government.

- Florida International University (2005)
  - An audit discovered that FIU did not have proper documentation to verify that PI’s spent the percent of time they had promised.
  - Improperly billed for time, travel, and admin expenses.
  - $11.5 million paid to government.

- Harvard University (2004)
  - Harvard disclosed that it had overcharged grants by requesting reimbursement for researchers who did not work on the grant.
  - $3.3 million paid to government.

Effort Reporting Workgroup

- RAPID workgroup formed to address campus concerns related to effort reporting.
- Group was tasked with addressing challenges to certification.
  - Team has discussed and prioritized over 20 major recommendations for improvement including policy, communication, compliance, training, system fixes / enhancements, backlog reduction, certification procedures, etc.
  - Identified an error in the ERS system regarding furlough calculations which was elevated to UCOP and resolved through a system-wide coding fix.
  - Worked through other ERS system issues including incorrectly flagged ARRA awards and other problems.
Effort Reporting Workgroup

- ERS Forum
  - Developed to meet the need for training at all levels, based on feedback from campus
  - Provide a medium of communication for ERS Coordinators
  - Reduce system, policy and training barriers to 100% on-time completion

- Campus Goals for Effort Reporting
  - Summer and Fall 09 Reports: 100% complete by June 4 deadline
  - Past Due Reports: 75% complete by September, 95%+ complete by December

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Effort Reporting Workgroup

- Team of 19 representatives from Central, ORA, and Campus

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<td>Pixie Ogren</td>
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EFFORT REPORTING BASICS
Effort Reporting Regulations

As an educational institution with FEDERAL funding, UCLA must adhere to the regulations outlined in OMB Circular A-21.

A-21 requires an effort reporting system be incorporated into the University official records and provide:

- After-the-fact confirmation of personnel costs charged to sponsored agreements (must include all UPAYs)
- Certification which encompasses all employee activities on an integrated basis (i.e. 100% effort)
- ERS certification forms are the primary auditable document to support salary on sponsored research awards.

Effort Reporting Regulations

- A-21 also states that:
  - Compensation must conform to institution’s policies and be consistently applied
  - Certification should be completed by an individual with suitable means of verification that the work was performed
  - Effort should be certified within a reasonable tolerance of 5%
  - Defines the difference between % of salary charged and % of effort
  - “A change applicable to a given project or activity of 5% or more of an employee’s total effort would warrant an adjustment by the employee”
  - This is not something that the ERS system accounts for automatically but should be considered by the certifier when reviewing the effort report (see next page for screen shot of pop-up box in ERS)

Certifying reports within a +/- 5% tolerance
**Effort Reporting Lifecycle**

Effort Reporting encompasses more than just the certification statement

**PRE-AWARD**
- Appointing Faculty & Staff

**PREPARING THE PROPOSAL**
- Preparing the Proposal Budget

**CHARGING SALARY**
- Charging Salary

**CERTIFYING EFFORT**
- Certifying Effort

**LEADERSHIP, POLICIES, TRAINING, SYSTEMS**

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**Effort Reporting Lifecycle**

- The Pre-Award Process
  - Include the correct Institutional Base Salary on the proposal
  - Monitor the Committed level of effort for the PI and ALL approved Key Personnel
  - Commitments should not exceed 100% (for most faculty, research commitments over 85% may not be reasonable given other professional responsibilities and commitments)
  - Reductions in effort of 25% or more should be reported
  - Accurately calculate and report cost sharing

- The Post Award Process
  - Charge payroll in a manner consistent with activities performed
  - Submit timely UPAYs
  - Certify effort within certification window to stay compliant
  - Keeping current with progress / technical reports

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**What is Effort Reporting?**

- Effort is the proportion of time spent on any single professional activity and is reflected as a **percentage of the total professional activity** for which an individual is employed by an institution
  - Effort is NOT necessarily based on a standard 40 hour work week
  - Total effort must equal 100%
  - Effort is a reasonable estimate (within a 5% tolerance)
  - Total professional activity includes teaching, clinical practice, research, and administrative responsibilities
What is Effort Reporting?

- The effort reported should be consistent with the allocation of time proposed or required by the award, in addition to what was actually paid under each project
  - ERS presents total percentages of payroll distributions as a starting point, based on the assumption that payroll is monitored and adjusted based on the effort expended
  - Certified effort reports should factor in cost sharing activities, as well as salary cost transfers (UPAYs) to correct any discrepancies between actual effort expended and payroll

How do we calculate effort?

- Budgeted Effort equals Effort Worked greater than or equal to Salary Paid (Budgeted Effort = Workload ≥ Salary Paid)
  - Budgeted Effort – Effort reported on proposals, progress reports, and prior approval requests to change effort
  - Effort Worked – How the employee spent their time
    - Effort actually worked on the grant or project throughout the quarter
    - Percent of total time worked, not number of hours
  - Salary Paid – How the employee was paid
    - Actual payroll charged to the grant or project
    - Must factor in salary cost transfers (UPAYs)

Who must certify effort and when?

- Any individual who has committed effort on a Federally sponsored project must complete an effort report
  - A person working on a Federally sponsored project with cost shared activities must still certify their effort
- Issuing Effort Reports
  - Issued on a quarterly basis for any individual that has a portion of salary charged to a Federal grant during that quarter
  - Generated 45-50 days after the quarter ends in order to include UPAYs processed after the quarter end
  - For individuals with 100% cost share on a Federal grant, their report will not be automatically generated but instead will need to be manually added to the ERS system
Who should certify the effort report?

- Review of Effort Reports
  - Department ERS Coordinators are responsible for verifying the data in ERS and working with the fund managers to process necessary UPAYs.
  - May include collecting backup documentation and working with the certifiers to complete the effort reports.
- Certification of Effort Reports
  - Must be certified by a person with suitable means of verifying the work performed, and has first-hand knowledge of all of the employee's effort.
  - PIs must self-certify in the system and also may certify for staff for which they have primary oversight and first-hand knowledge.
  - Having each individual certify his or her own effort report is the safest way to meet this requirement.

UCLA Requirements

- UCOP has recently developed and approved a new policy for Effort Reporting (Consequences Statement) that includes potential escalation procedures for non-compliance.
- A message will be forthcoming from the Vice Chancellor for Research with more information on the Consequences Statement as well as reiterating the importance of effort reporting compliance at UCLA.

Effort Reporting

- Effort Reporting Issue Dates and Deadlines for Certification

<table>
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<tr>
<th>Quarter</th>
<th>Release Date</th>
<th>Due Date</th>
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<tr>
<td>Summer 2009</td>
<td>April 15, 2010</td>
<td>June 4, 2010</td>
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<td>Fall 2009</td>
<td>April 15, 2010</td>
<td>June 4, 2010</td>
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<td>Winter 2010</td>
<td>Mid August 2010</td>
<td>Early October 2010</td>
</tr>
<tr>
<td>Spring 2010</td>
<td>Mid August 2010</td>
<td>Early October 2010</td>
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Effort Reporting Assistance

- EFM will be visiting individuals departments to help work through the open effort reports
  - Plan to visit 5-6 departments per quarter that have the largest number of open reports and/or the lowest certification rates
  - Sharing best practices between departments
- After documenting the common issues and fixes for certifying reports, EFM has an ERS FAQ that they continue to update: http://www.efm.ucla.edu/ERS%20FAQs.htm
- If you are interested in setting up a meeting with EFM, please email ershelp@research.ucla.edu

SYSTEM UPDATES

ARRA Funds

Issue:
- ARRA funds appeared incorrectly under “non-sponsored projects”
- Affected approximately 40 Spring ’09 effort reports

Resolution:
- Updated indicators in FS for ARRA funds to be recognized in ERS as federal funds requiring certification
- Removed and re-generated affected Spring ’09 effort reports

Additional Action Required:
- If you have a Spring ’09 effort report that was missed by the removal and re-generation process:
  - Manually update the effort report by adding the ARRA funds via the “Add Sponsored Project” feature.
  - If this results in Certified/AdjustmentRequired status, contact ERS Support to manually update the status to Certified.
Furlough Calculation

**Issue:**
- SRB pay lines for furlough were not included into the overall effort calculation
- Delayed release of Summer '09 and Fall '09 effort reports

**Resolution:**
- AIS provided a retroactive fix which incorporated the SRB lines in the effort calculation; addressed Summer '09, Fall '09 and Winter '10 effort reports for monthly employees only
- UCOP provided a prospective fix to address effort reports generated for Spring '10 and on

**Additional Action Required:**
- Effort reports for bi-weekly employees impacted by the furlough will require special handling. Contact ERS Support for assistance.

ERS Management Report - Demo

- Available on the Portal under the Compliance tab

**HOW TO GET STARTED IN ERS**
ERS Basics

- **ERS Website** [http://www.efm.ucla.edu/EffortRpt.htm](http://www.efm.ucla.edu/EffortRpt.htm)

**System Tool**
- Training Modules
- FAQs

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ERS Basics

- **Access to ERS**
  - Must be an active UCLA employee
  - Requires a UCLA Logon ID and Password
    - If an employee does not have and ID or has forgotten his/her password, go to [https://logon.ucla.edu/activate.php](https://logon.ucla.edu/activate.php)
    - Requires connection to the secured UCLA Network
  - If an employee is trying to access ERS from off-campus, s/he must connect via Bruin OnLine (BOL) Virtual Private Networking (VPN)
  - Instructions on how to connect to BOL VPN are found [http://www.bol.ucla.edu/services/vpn/pptp/](http://www.bol.ucla.edu/services/vpn/pptp/)

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ERS Basics

![Table](image)
ERS Basics

- Original Payroll % (non-editable)
  - ERS estimation of % salary based off the Payroll ledgers
  - Reflects actual % PAID

- Adjusted Payroll %
  - Fund Manager determination of % salary based off their knowledge of changes to Payroll ledgers, i.e. any UPAYs/payroll cost transfers
  - Only adjust if a UPAY will be processed and/or has hit the ERS Estimation column

- When ERS 1st generated, both columns match. If changes are made & saved in Adj Pay %, future changes in Orig Pay % will not automatically change Adj Pay % to match.

ERS Basics

- Adjusted Cost Sharing %
  - Records changes to Cost Sharing
  - Accounts for Effort without salary (in-kind effort)
  - Can only be adjusted from non-sponsored activities (unrestricted funds), except in the case of Work Study

- Adjusted Total %
  - Total of Adjusted Payroll and Adjusted Cost Sharing
  - Reflects total Effort to be certified, regardless of where salary was paid

ERS Basics

- The effort distribution should be checked against the departments internal controls for verifying payroll distribution and monitoring UPAYs
- The effort distribution should also be checked against the sponsor approved budgets and progress reports
- In addition to individual department shadow systems, the ERS Detail Report will be available to campus, starting May 7th
  - Be on the lookout for a Campus-wide email communication containing the link to download the ERS Detail Report
ERS (PAR) DETAIL REPORT

ERS (PAR) Detail

Enter the Employee’s UID. If unknown, enter the Employee’s name and hit Find Employee.
ERS (PAR) Detail

- Leave all fields to the default asterisk and hit next

ERS (PAR) Detail

- Choose the From Year *FIRST* and then the Quarter of the Effort Period (the order is important!)

ERS (PAR) Detail

- Leave the default for Report Fields and click Finish
ERS (PAR) Detail

- The column highlighted yellow in the ERS detail report should be compared to the Original Payroll % on the ERS Report.
- If they do not match, a reconciliation needs to be done.

ERS (PAR) Detail 9 Month Faculty

- 9 month faculty overview

ERS (PAR) Detail 9 Month Faculty

- For Summer Quarter only—leave all fields to the default asterisk except the DOS field, then you will add additional compensation DOS codes: ACA, ACR, ACS, ACT, ACU.
ERS (PAR) Detail 9 Month Faculty

- Change month and year to reflect correct pay period for the corresponding Quarter
- Leave "Quarter" field blank

ERS (PAR) Detail 9 Month Faculty

- The column highlighted yellow in the ERS detail report should be compared to the Original Payroll % on the ERS Report
- If they do not match, a reconciliation needs to be done

ERS (PAR) Detail 9 Month Faculty

- For all Quarters, except Summer, leave all fields to the default asterisk and hit next
ERS (PAR) Detail 9 Month Faculty

- Change month and year to reflect correct pay period for the corresponding Quarter
- Leave "Quarter" field blank

ERS (PAR) Detail 9 Month Faculty

- Delete all rows containing additional compensation DOS codes

ERS (PAR) Detail 9 Month Faculty

- The column highlighted yellow in the ERS detail report should be compared to the Original Payroll % on the ERS Report
- If they do not match, a reconciliation needs to be done
EFFORT REPORTING BEST PRACTICES

Best Practices - ERS: 7 Simplified Steps

1) **SET UP**: Create Saved Searches specific to Dept code, PI and/or FAU. Usually only need to be set up once, depending on the criteria used.
   - Two recommended Saved Searches (for “Manage Searches”)
     - *By Department code* – shows Effort Reports of all personnel with that Dept listed as their Home Dept in EDB as of TODAY
     - *By Subscribing to PI’s My Projects List* – shows all Effort Reports as that PI will view them under his/her PI logon
2) **RELEASE:** Effort Reporting System sends an email notification via ERS listserv that the Quarter’s Effort Reports are available in ERS & ready for certification
   - Fund Managers (FM)/ERS Coordinators (EC) given 45-50 days to have the reports verified and certified by the appropriate person

3) **PREPARATION:** Gather tools required to start ERS verification process:
   - ERS
   - ERS (PAR) Detail Report
   - Current/Approved Budgets (or Progress Report’s Personnel Report) for all Federal contracts & grants
   - Copies of UPAYs, or any other payroll transfer documentation used in your Dept, affecting the ERS Quarter’s payroll.

4) **VERIFICATION:** Every Effort Report should be reviewed & verified by the PI/Certifier
   - The ERS Detail Report (Payroll Ledgers which reflects Paid Effort) AND current/approved Federal Budget/Progress Report (Proposed Effort) for all Key Personnel.
   - **Required for EVERY single Effort Report.**
     - *Compare* the Original Payroll % (check View Payroll Detail) in ERS with yellow highlighted column in ERS Detail Report
     - *Confirm all UPAYs,* if applicable, that have already been processed have been taken into account.
     - *NOTE:* Payroll runs 1x month. ERS syncs with the Payroll system every 2 weeks.
     - *Prepare necessary UPAYs ASAP,* if applicable
     - *Edit Adjusted Payroll % only if variance greater than +/- 5%*
     - *Add Adjusted Cost Sharing %, if applicable*
     - *Comment* - Once Adjusted Total % reflects the correct %, add a comment to the ERS Comment Log – “Report reviewed & verified by FM Name on 05/05/10.” as well as any other descriptive comment.
     - *Save changes*

5) **REVIEW:** Set up a time prior to the Quarter’s ERS certification deadline to sit down with the PI/Certifier to review & explain each individual Effort Report s/he is responsible for completing.

6) **CERTIFICATION:**
   - PI’s must self certify. (Names highlighted in yellow in ERS.)
   - Staff members may self certify.
   - If possible, a PI may certify all the reports for his/her staff members paid off his/her Federal research projects.

7) **FOLLOW-UP:** The Effort Reporting process is NOT over once all Reports have been certified. FM/EC should log into ERS to check the time to time to review their list of Saved Searches. Effort Reports may reopen due to late payroll transactions.
Best Practices - Review

1) Compare Orig Pay % with ERS Detailed Report
2) Edit Adj Pay % only if variance is greater than +/- 5%
3) Add Adj Cost Sharing %, if applicable
4) Comment – Add description of what action was taken on Effort Report
5) Save

Best Practices – Hints & Tips

- Start early!
- Good ERS management starts with good fund management/monthly reconciliation.
  - Minimize payroll cost transfers (UPAYs).
  - Check Salary Cap Overpayment/Disallowance Report regularly, if applicable.
- Process required UPAYs in a timely manner.
  - Wait for these UPAYs to hit ERS prior to changing the Adj Pay %.
- When Effort Reports are initially generated, Orig & Adj Pay % Columns automatically match.
  - If Adj Pay % remains unchanged, it will continue to change to match Orig Pay %.
  - Once Adj Pay % Column is changed & saved, any type of change to Orig Pay % will not automatically update Adj Pay % to match.
- Review Saved Searches even during off ERS certification cycles to ensure there are no Open ERS.
  - Certified/Adjustment Required status are still considered Open.
  - Priority during ERS certification cycles is to have that quarter all certified. Once done, work on backlogged/overdue ERS, if any.

CHALLENGES TO 100% CERTIFICATION
Challenges to Certifying

- Certified/Adjustments Required (Shannon McGarry)
- Old Reports for Employees that have left UCLA (Annette Klufas)
- Employees that Change Departments (Connie Brown)

What to do when...

- **ISSUE**: Certified / Adjustment Required Status
- **CAUSES**: Results when changes have been made to a report but a UPAY was not submitted to adjust the original payroll
- **SOLUTIONS**:
  - Verify that the payroll detail is correct using the ERS Detail Report
  - If the Original Payroll Column and the Adjusted Payroll % column differ by less than +/-5%, match the columns and indicate in the comments that this is within the 5% allowable tolerance.
  - An acceptable comment is “The effort was within a +/-5% variance of the original payroll %. Therefore, a salary adjustment is not necessary.”
  - If the Original Payroll Column and the Adjusted Payroll % column differ by more than +/-5% or you have first hand knowledge that the adjusted payroll is correct, leave the columns as is and process a UPAY.

Example: Certified/Adjustment Required
What to do when...

ISSUE: Open reports in ERS for an employee that has left UCLA

CAUSE: Reports are not addressed by employee prior to departure from UCLA

SOLUTIONS:
- Contact the employee to go into ERS to review and certify the report, if they still have access.
- Send a copy of the report for verification and certification and the name of the person that can certify on their behalf.
- If PI or employee is unavailable, have someone at UCLA with “first-hand knowledge” certify the report on his/her behalf.
- Standard comment: “The PI of the project (and/or the employee) is unavailable. A is certifying on B’s behalf. A has first-hand knowledge of B’s effort and is certifying from the best of his/her knowledge. ERS Support Team, please grant A access to certify.”

What to do when...

ISSUE: Employees change departments before certifying effort reports from prior quarters

CAUSES:
- The new department cannot view the report because the FAU does not belong to that unit.
- The old department no longer has that employee on their list of reports.

SOLUTIONS:
- Contact ERS Support to identify the old department’s coordinator.
- ERS Support can provide a copy of the report, the department, and the name of the coordinator.
- Old department can run a search by Fund or the PI’s “My Project’s” list, if the project belongs to them.
- If necessary ERS can give the old or new department’s coordinator access to the employee’s report for review.

Backup Documentation

In cases where the ERS system cannot be corrected, and the correct effort distribution is reflected, ERS Support in EFM may have to manually certify the report.

In order for EFM to certify these reports, departments must submit the following documentation:
- Printout of ERS report in system
- Backup documentation (Ex: ERS Detail Report) showing that the adjusted effort is correct
- A detailed justification in the comments section explaining the discrepancy (Ex: “The Original and Adjusted Payroll % do not match. Adjusted Payroll % reflects the correct percent of effort as certified. UPAY processed and appeared on the ledger. No further action is required. ERS Support, please review the report and update the status.”)
ERS Template Justifications

**For Alternate Certifier Access** use one of the below:
- For Chief to be Alternate Certifier
  - If the Alternate Certifier (Chief) is certifying on behalf of the PI of effort, please grant access.
- For PI of the project to be Alternate Certifier:
  - If the PI is unavailable, **Chief A** has first-hand knowledge of the effort's progress. ERS Support Team, please grant access.

**Spring/Summer Work**
- Adjusted Pay % column reflects the correct effort as certified. No further action required. ERS Support Team, please investigate & update the status.
- Adj Pay % spent across FCF for same award # is incorrect. Fund is closed & FSR submitted. Adj Pay % across same award reflects correct effort as certified. No further action required. ERS Support Team, please investigate & update the status.
- Adj Pay % spent across award # is incorrect. Fund is closed & FSR submitted. Adj Pay % across same award reflects correct effort as certified. No further action required. ERS Support Team, please investigate & update the status.
- Orig Pay % Grand Total incorrectly shows a % other than 100% due to Unrecognized Earnings in View Payroll Details. Adj Pay % column reflects correct effort as certified. No further action required. ERS Support Team, please investigate & update the status.
- Orig Pay % & Adj Pay % don’t match, indicating UPAYs are required, even though the UPAYs have already been processed. Adj Pay % column reflects correct effort as certified. No further action required. ERS Support Team, please investigate & update the status.

Future Forum Sessions

**Topics to be discussed**
- Multiple Appointments
- Payroll and UPAY Justifications
- Cost Sharing
- Back to Basics
- System Updates
- Best Practices
- Dept challenges to 100% completion
- Pay source incorrect
- Reports re-opened by the system
- Multi-line certifications
- Partially certified reports
- K/F awards
- NIH Salary Cap
- 8/12 Appointments
- Overtime/Part-time employment
- Adjusted effort total does not equal 100%
- Open reports on closed awards
ERS Resources and Information

- Effort Reporting Website
  - https://ers ais.ucla.edu/
- ERS Training Modules
- For additional Forum topics or to participate in the Effort Reporting Workgroup, please email:
  - ershelp@research.ucla.edu
- RAPID Closeout Tool for ERS Detail Report (available May 7th)
  - Link will be available on the ORA portal later this week

ERS Training Modules

- ERS Training – Additional Resources
  - http://www.efm.ucla.edu/ERSTrainingMenu.htm