ecrt Principal Investigator Training

December 2012 – January 2013
Financial Compliance for Research
Agenda

1. Research Compliance Overview
2. Introduction to ecrt
3. Effort Certification Scenarios
1. Research Compliance Overview

- Sponsored awards are made to the University of Pittsburgh, with the Principal Investigator serving as the “steward” of the research project and accompanying funds received from the sponsor.

- The University is legally responsible to the sponsor, but the PI is held accountable for the proper fiscal management and conduct of the project. PI responsibilities include:
  - Scientific performance of the work related to the project
  - Management of the project within funding limitations
  - Assurance that the sponsor will be notified when significant conditions related to the project change
  - Responsibility for the day-to-day management of project finances may be delegated to administrative or other staff, but accountability for compliance with University of Pittsburgh policy and sponsor requirements ultimately rests with the PI.
Why Certify Effort?

- **Effort Certification is a Federal requirement**
  - OMB Circular A-21 (Cost Principles for Educational Institutions) requires some form of after-the-fact confirmation that labor expenses represent actual costs

- **Labor expenses typically represent the majority of direct costs of research**

- **A new Effort Reporting Policy at the University of Pittsburgh has been approved**
  
  - The policy can be found at: http://www.cfo.pitt.edu/fcr/documents/EffortReportingPolicy.pdf

- **Effort certification is the primary means of verifying that:**
  - Effort supported (paid) by the project has been performed as promised, and
  - Effort expended in support of a project but not paid by the project (cost sharing) has been performed as promised.
Key Points to University’s Effort Reporting Policy

- **Faculty/PI responsibilities:**
  - To be aware of his/her effort on sponsored projects and all other University obligations. Communicate any significant change to the Department Administrator.
  - PI’s must ensure reasonableness of effort distributions for all employees on his/her sponsored projects, including effort certification.
  - All PI’s must contribute some level of effort on his/her sponsored projects, regardless of the availability of sponsor funding. Amount of effort should reflect time necessary to oversee all aspects of work.
  - Faculty will be asked to justify 100% research effort. Activities including proposal writing, departmental meetings, advising students, etc. cannot be charged to sponsored projects.
Key Points to University’s Effort Reporting Policy

- Chairs and Deans are responsible to ensure that PI’s comply with all aspects of effort reporting policy.

- All faculty and staff with sponsored research responsibilities are required to participate in mandatory systems and compliance training as needed.
What is Effort?

- **Effort** is the portion of time spent on a given professional activity and expressed as a percentage of the total 100% professional activity for which an individual is employed by the University of Pittsburgh.

- **Important points:**
  - The government recognizes that it is a “reasonable estimate”
  - Total effort must equal 100% per effort statement
  - Effort is not based on a standard (e.g., 40-hour) work week, instead based on each employee’s typical level of work performed (e.g., 25, 48, 60 hours per week)
  - “100% Effort” considers all professional activities related to the individual’s University of Pittsburgh appointment (teaching, research, service, administration)
  - Effort does not include outside activities (e.g., external consulting, UPP activities, etc.)
Effort Reporting at the University of Pittsburgh

- All employees paid from or with cost sharing to a federal sponsored project are required to complete an effort statement, per federal regulations.

- **The PI of the Project is responsible for certifying effort statements of all individuals on the project EXCEPT other PIs. PIs will ALWAYS certify their own effort statements.**
Effort Reporting Schedule

- Effort Statements will be certified every academic term (The Periods of Performance will be September – December, January – April, and May – August)

- PIs will have 45 days to complete their certifications in ecrt.

- Because of the integration of a new SPAR system, the first certification period will require two separate sets of effort statements to be certified for the Periods of Performance of July – August 2012 and September – December 2012. All subsequent certification periods will involve only one set of effort statements corresponding to a 4-month Period of Performance.

- The first Certification Period will begin on January 22, 2013 and End on March 7, 2013.

2. Introduction to ecrt

- **ecrt** is a web based Effort Certification System to facilitate compliance and increase productivity

- **Automatic Notifications (emails)**
  - Notification will be sent automatically when effort statements are available for certification.
  
  - There are links present throughout the system that allow you to email your Effort Coordinator (fiscal administrator) for assistance.
  
  - If a previously certified effort statement is reopened for subsequent adjustment, thereby requiring re-certification – you will receive an email notification indicating action necessary on your part.
  
  - Reminder emails will be sent throughout the 45-day certification period to inform you of outstanding certification responsibilities. No reminders will be received if all of your effort statements have been certified.
Logging into the System

- ecrt link will direct all users to login through my.pitt.edu
Logging into the System

- When you enter your credentials into my.pitt.edu, you will be directed to main landing page. The link for ecrt will be included in the listing on the right side of your page, along with your links to other university systems.
Using the System

- The system will open to your list of Effort Statements Awaiting Certification.

- You will see Effort Statements for employees with effort on sponsored projects that are associated to you. As you certify each statement, it is removed from your list.

- Any blue hyperlink in the system is a link to an additional page (report, summary, etc.).

- A help button is in the top right corner of pages to provide additional detail about the page you are viewing and the options that you have.
3. Effort Certification Scenarios

- **What causes your effort statement to require certification?**
  - Any individual who is paid (or cost shared) on a Federal Sponsored Project during a reporting period will have an effort statement that needs to be certified.

- **What causes a PI to be responsible for certifying someone else’s effort statement?**
  - If you are the PI on a project – you will be responsible for certifying the effort of every individual who works on the project – unless the individual is a PI themselves. All PIs certify their own effort statements.

- **What happens when someone who works on your federal sponsored projects also works on federal sponsored projects of another PI?**
  - Both you and the other PI will have access to the effort statement of this employee. However, you will only have access to certify your project(s) while the other PI will only have access to certify his/her project(s).
Effort Certification Scenarios Continued

• **Who is responsible for certifying the Sponsored Non-Federal and Non-Sponsored lines of an effort statement?**
  
  – As federal guidelines require us to account for 100% of an individual’s time, the effort statement in ecrt may contain accounts for Sponsored Non-Federal or Non-Sponsored activity. The PI who has HR responsibilities for the employee is responsible for certifying ALL Sponsored Non-Federal and Non-Sponsored lines of the effort statement.

• **How will I know when I have finished all of my certification responsibilities?**
  
  – ecrt will present you with a Work List that displays every employee who you need to certify. This Work List will be updated as you complete the certifications and will be empty (with the exception of displaying your name) when you are finished certifying. The next ecrt Training Video will review this process in detail.
What Next?

• Watch the next Training Video to complete the requirements of ecrt Training in ISER.

• Contact your Effort Coordinator (fiscal administrator) with any questions you have about ecrt or effort reporting. You can also look at additional training on the Financial Compliance for Research website at:

  http://www.cfo.pitt.edu/fcr/ecrt.php

• Look for an email in your inbox on Tuesday January 22, 2013 when our first certification period begins!