



Harvard Pilgrim Health Care, Inc.
Harvard Pilgrim Health Care Institute
Office of Sponsored Programs
Policy and Procedure

TITLE: Time & Effort Certification

PURPOSE:

To inform the research community of the federal regulations and internal policy and process to manage time & effort correctly.

PERSONS AFFECTED:

This policy & procedure (P/P) applies to all Harvard Pilgrim Health Care, Inc. (HPHC) and Harvard Pilgrim Care Institute, LLC (HPHCI) (collectively, HPHC/I) personnel engaged in research, teaching or research administration activities in support of the charitable and educational mission of HPHC, Inc.

POLICY:

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards § 200.430 requires that Harvard Pilgrim Health Care (HPHC), as a recipient of federal funds, provide after-the-fact certification of actual activity performed on federally sponsored programs and each report must account for THE TOTAL ACTIVITY (**Institutional Base Salary (IBS)**) for which employees are compensated and which is required in fulfillment of their obligations to the organization.

PROCEDURE:

Effort

All effort must be charged appropriately, regardless of funding source. Faculty clinical effort is funded by clinical revenues generated by the clinical work (not by departmental funds). Faculty with regular clinical duties must charge the appropriate effort to their clinical account.

No HPHCI faculty member can be paid more than 95% salary or devote more than 95% effort to sponsored research, clinical work, teaching and/or internal administrative appointments unless approved by the department leadership. The remaining 5% will be funded by other program or departmental sources. Part-time faculty/staff must use their HPHC/I IBS when applying for grants.

At HPHCI, an individual's effort is managed by a Labor Coordinator through the Oracle Labor Distribution Module (LD) which is an integrated module with Payroll, Human Resources and Grants Management (GMS).

Certification

The Time & Effort Reports will be generated and distributed monthly by Office of Sponsored Programs (OSP) via the Oracle Labor Distribution module. Each employee will receive an email notification indicating the report requires review and certification. The report will indicate the current salary splits including support from research, clinical, teaching and administrative duties. The total percent effort from all activities cannot exceed 100%.

If the report is accurate, the employee will certify the report via the “Certified” link included in the Time & Effort report email notification, which will generate an email to be sent to the database for tracking and electronic storage.

The reports must be certified or signed by the individual employee, or by a responsible supervisory official (designee) having firsthand knowledge of the activities performed by the employee, that the distribution of activity represents a reasonable estimate of the actual work performed by the employee during the periods covered by the reports.

If a modification to effort is required, the employee must access the Oracle E-Business Suite application and select the Time & Effort report from the Worklist. Revised effort is then entered and certified. Reports must be edited when cost sharing is used because an employee’s salary is over the salary cap.

Hard copy reports may be sent to individuals upon request. These signed reports are maintained in a file cabinet by the Associate Grants Administrator (AGA)

If a correction to labor is required, a re-certified Time & Effort report must accompany the Cost Transfer for Labor Distribution Form.

These reports must be reviewed, effort revised if necessary, and certified within 30 days of the email notification.

If a report is not certified by day 31, an email, with a copy to the department administrator/manager, shall be sent to the employee not returning the report. If the report has not been certified within 14 days of the first email, another email will be sent to the employee, with a copy to the department chair and no expense will be allowed on projects until the time & effort report is certified.

REVISION HISTORY:

Department: OSP	Title: P&P Time & Effort Certification
Effective Date: 3/1/2019	Owner: Director, Office of Sponsored Programs
Replaces P/P Dated: 1/1/2017, 6/1/2017	
REFERENCES: Policy & Procedure: Cost Transfers; Policy & Procedure: Calculating Salaries and Calendar Months for Grant Submissions	

