

**SOUTH FLORIDA STATE COLLEGE  
ADMINISTRATIVE PROCEDURES**

**PROCEDURE NO.** 4221

**TITLE:** GRANTS AND CONTRACTS PERSONNEL ACTIVITY REPORTS

**BASED ON POLICY:** 4.22 GRANTS ADMINISTRATION

**OFFICE OF PRIMARY RESPONSIBILITY:** VICE PRESIDENT FOR ADMINISTRATIVE SERVICES/CONTROLLER

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I. Purpose:

To establish personnel activity report procedures for all sponsored activities (grants and contracts from any source)

II. Procedure:

The College must assure that effort expended on sponsored activities justifies the salaries charged to them. The College provides this assurance by requiring certifications for grant-funded employees whose salary is charged or matched to one or more grants or contracts during the effort reporting period. These effort reports indicate calculated percentages of the individual's total effort that are dedicated to the grants or contracts as well as to other College activities, and require a certification attesting to the fact that these effort percentages represent actual effort put towards grant activities.

A. Documentation of salaries charged to grants and contracts

1. For federal grants and contracts, the College is required to follow *2 CFR 220*, Cost Principles for Educational Institutions. The federal regulation provides three methods for documenting payroll distributions. For consistency, the College is using the same method for all grants regardless of source.
2. After-the-Fact Activity Records Method is one of the three methods for documenting payroll distributions. The College employs this method to certify the distribution of salaries and wages based upon a percentage distribution to various activities, supported by certification and evidence of applicable activity.
3. All College employees charged to a grant (any source of funding) or whose salary is used as a matching requirement to a grant will be required to complete an effort report as follows:

- a. Career service staff will need to complete a personnel activity report for every month that time is spent working to benefit sponsored programs. The activity report will be completed simultaneously with the College timesheet and will reflect all time worked. The activity reports will be individualized for the specific employee's work efforts so an Excel template will be provided by the grants accountant to each employee working for grants to expedite the completion of both.
  - b. All salaried staff will need to complete a personnel activity report that summarizes monthly activity every quarter and forward to the grants accountant. The quarters will be determined by the start date of a grant and be for each three-month period thereafter.
4. The effort report is to be signed by the employee and someone with knowledge of the employee's effort on the grant project. Should the employee not be available to sign, it should be noted and the signature of a person with knowledge of the employee's work effort is the only signature needed.
5. Personnel activity reports for career service employees are expected to be provided monthly along with the payroll timesheet. The due dates will follow the payroll timesheet deadlines and can be turned in to payroll at the same time. Payroll staff will give the effort reports to grants accountants. Effort reports for salaried staff should be completed and turned into the grants accountant managing the relevant grant within 15 days from the quarter end.
6. The grants accountant will review the personnel activity reports and job descriptions alongside each employee's role in the grant as described in the grants narrative to ensure that salary charges appear reasonable given the grant plans and actual effort incurred. Should there be a significant variation in the budgeted allocations of effort and actual effort committed to a grant, the grants accountant will discuss with the grant manager the need to reallocate budget to reflect actual activity. The grant manager will authorize any salary redistributions resulting from discussion with the grants accountant.
7. Level of Precision of Effort Reports - The federal government recognizes that decisions made in the certification of effort percentages to individual sponsored activities are based on estimates. 2 CFR Part 220 states, "Short term fluctuations between workload categories need not be considered as long as the distribution of salaries and wages is reasonable over the longer term, such as an academic period" or fiscal year.
8. Independent Internal Evaluation: To satisfy the general principles in 2 CFR Part 220 [OMB Circular A-21, Section J10b (2)(f)], an independent

internal evaluation of the system's effectiveness and compliance will be conducted periodically.

- B. The grants managers and the grants accountant will share the following responsibilities for each grant:
1. Understanding and employing the principles, policies, and procedures related to accurate and timely certification of personnel activity reports
  2. Communicating with departmental administrators in the establishment of accurate and timely labor distribution schedules to ensure appropriate allocations of salary costs across various grants and College activities
  3. Ensuring that all effort commitments are accurately reflected on the activity reports
  4. Ensuring that his/her own effort and that of other individuals working on grant activities under their direction is certified accurately and in a timely manner
  5. Complying with grantor requirements regarding any significant reductions (normally  $\geq 15\%$ ) in effort commitments on funded activities
  6. Reacting to and correcting any inaccuracies or omissions on the distributed effort reports to accurately reflect effort commitments toward grant activities
  7. Identifying and communicating to the grants accountant situations where labor distribution adjustments are necessary given a level of certification different from the corresponding "payroll" percentage
  8. Responding to any questions posed by reviewers regarding the certification of effort
  9. Adjusting labor schedules/performing labor distribution adjustments in a timely fashion in support of accuracy in salary allocations

**HISTORY: Last Reviewed: 10/22/19**

**Adopted:** 5/08/12

**Reviewed:** 10/22/19

**Revised:** -