



Santa Clara
UNIVERSITY

**SANTA CLARA UNIVERSITY
SPONSORED PROJECTS OFFICE
TIMEKEEPING AND EFFORT CERTIFICATION POLICY**

Effective Date: August 21, 2026

Last Revision: August 21, 2026

1. Purpose

Santa Clara University (the "University") maintains a system of internal controls to ensure that salary and wage charges to Federal awards accurately and reasonably reflect the work performed, consistent with the requirements of the [2 CFR 200 \(Uniform Guidance\)](#).

2. Scope

This Timekeeping and Effort Certification Policy (this "Policy") applies to salary and wage charges to Federal awards and to effort committed to Federal awards as cost sharing.

3. Policy

Salary and wage charges to Federal awards must be supported by University records that accurately reflect the work performed and the distribution of compensation among applicable activities.

The University's financial and payroll records document salary and wage charges to Federal awards. The University supplements these records through a periodic, after-the-fact review and certification process designed to provide reasonable assurance that Federal salary charges reflect the work actually performed.

Effort is expressed as a percentage of an individual's total compensated University activities and may not exceed 100%.

Significant discrepancies identified through the certification process must be corrected in a timely manner so that final salary and wage charges to Federal awards are accurate, allowable, reasonable, and properly allocated.

4. Faculty Effort

Faculty effort is based on the responsibilities associated with the individual's University appointment and is not defined by a standard number of hours worked.

As provided in [Santa Clara University Faculty Handbook §3.6.2](#), acceptance of a full-time faculty appointment requires a commitment that is "full-time in the most inclusive sense." The Faculty Handbook further recognizes that faculty have considerable independence in ordering their work toward fulfillment of their University responsibilities.

- Under [Faculty Handbook §3.6.3](#), full-time faculty responsibilities encompass teaching, scholarly or creative work or professional activity, and service.
- The Faculty Handbook further recognizes sponsored projects as University activities and provides that sponsored projects may include specific commitments regarding the level of personnel effort ([§3.7.4.1](#)).
- Sponsored projects administered by the University are also specifically distinguished from outside consulting activities ([§3.7.4.3](#)); outside consulting activities are not included in determining University effort.

Accordingly, sponsored research and other sponsored activities undertaken as part of a faculty member's University responsibilities are included within total University effort.

5. Effort Certification

Principal Investigators and senior/key personnel whose salary is charged to a Federal award, or whose effort is committed to a Federal award as cost sharing, are responsible for reviewing and certifying that their reported effort reasonably reflects the work performed.

Effort for other personnel whose salary or wages are charged to a Federal award will be reviewed and certified by the Principal Investigator or another responsible University official with suitable means of verifying the work performed.

The Principal Investigator is responsible for final certification of effort charged to the Federal award.

Effort certification is not a timesheet and does not require the tracking or reconstruction of hours worked, nor is it intended to provide a precise accounting of time. Certified effort

represents a reasonable, after-the-fact assessment of the relative distribution of an individual's total compensated University activities during the certification period.

6. Responsibilities

- **Principal Investigators**

Principal Investigators are responsible for understanding and fulfilling effort commitments associated with their Federal awards and for participating in the University's effort certification process. The University's acceptance of a Federal award includes responsibility for reviewing and certifying that salary and wage charges to the award reasonably reflect work performed.

- **Senior/Key Personnel**

Senior/key personnel whose salary is charged to a Federal award, or whose effort is committed as cost sharing, are responsible for reviewing and certifying that their reported effort reasonably reflects the work performed.

- **Sponsored Projects Office**

The Sponsored Projects Office (SPO) is responsible for administering the Federal effort certification process, providing guidance and training, monitoring compliance, and coordinating necessary corrections with appropriate University offices.

6. References

- 2 CFR §200.430(g), Standards for Documentation of Personnel Expenses
- 2 CFR §200.303, Internal Controls
- Santa Clara University Faculty Handbook

Exhibit A

Federal Certification Reporting Procedure

The procedures described in this Exhibit reflect the University's current practices for implementing the Timekeeping and Effort Certification Policy as of its effective date. These procedures may be revised from time to time to reflect operational needs, changes in University systems or responsibilities, or changes in applicable Federal requirements. Current procedures will be maintained and published by the Sponsored Projects Office on its website.

Changes to these procedures that do not materially alter the requirements of the Timekeeping and Effort Certification Policy do not require revision of the Policy.

1. Award Acceptance and PI Responsibility

At the time a Federal award is accepted, SPO will identify the award as subject to the Timekeeping and Effort Certification Policy.

The Principal Investigator will be informed that acceptance of a Federal award includes responsibility for:

- ensuring that salary and wages charged to the award reasonably reflect work performed;
- reviewing effort reported for personnel supported by the award;
- participating in the University's effort certification process; and
- identifying discrepancies requiring correction.

2. Establishment of Salary Charges

Salary and wage expenses will be charged to Federal awards through the University's payroll and financial systems based on established salary distributions.

The University's payroll and financial records serve as the official record of salary and wage expenses charged to Federal awards and form the basis for the effort reporting process.

3. Generation of Award-Level Effort Certification Reports

Following each certification period, SPO will generate an effort certification report for each Federal award based on University payroll and financial records.

The report will identify, at a minimum:

- Federal award;
- Principal Investigator;
- Certification period;
- each employee whose salary or wages were charged to the award;
- salary or wages charged to the Federal award for each employee; and
- the percentage of each employee's total compensated University activity represented by the charge to the Federal award.

An individual's total compensated University activities constitute 100% effort. The effort percentage attributed to a Federal award represents the portion of that total activity devoted to the award. **The effort certification process does not require the allocation or certification of University activities that are not charged or committed to the Federal award.**

4. Certification Frequency

Effort certification will occur **twice annually**, aligned with the University's fiscal year:

- **July 1 through December 31:** certification completed in **March**
- **January 1 through June 30:** certification completed in **August**

This schedule allows sufficient time following each certification period for payroll and financial records to be finalized before SPO generates and distributes effort certification reports.

5. PI and Senior/Key Personnel Certification

Each Principal Investigator and senior/key person whose salary is charged to a Federal award, or whose effort is committed as cost sharing, will review their reported effort and determine whether it reasonably reflects the work performed during the certification period.

The individual will either:

- certify that the reported effort reasonably reflects the work performed; or
- identify a discrepancy requiring review or correction.

6. PI Review and Certification

Following individual personnel verification, the PI will review the award-level effort report.

For personnel other than the PI, the PI's certification confirms that, based on the PI's knowledge of the project and suitable means of verification, the reported effort reasonably reflects work performed in support of the Federal award.

For their own effort, the PI will certify that the reported effort reasonably reflects the work they performed on the Federal award.

The PI's certification constitutes final certification of the award-level effort report for the applicable certification period.

7. Unavailable or Separated Employees

When practical, an employee whose salary or wages have been charged to a Federal award should complete any required effort verification before separation from the University or an extended absence.

If an employee is unavailable to complete verification, including because of separation, extended leave, or other circumstances, the PI or another responsible University official with suitable means of verification may verify the employee's effort.

The individual providing verification must have sufficient knowledge of the work performed to reasonably determine that the salary or wages charged to the Federal award reflect the work performed.

The effort certification report will document that verification was completed on behalf of an unavailable employee and identify the individual providing the verification.

8. Discrepancies and Corrections

If reported effort does not reasonably reflect the work performed, the discrepancy must be reported to SPO before certification. SPO will coordinate any necessary corrections to ensure that salary and wage charges to the Federal award accurately reflect the work performed. Corrected effort will then be certified.

9. Record Retention

The completed award-level effort certification report, including required PI and senior/key personnel certifications and documentation of any corrections or alternate certifications, constitutes the University's effort certification record for the Federal award and certification period.

Effort certification records will be maintained in accordance with applicable Federal and University record-retention requirements.