



MEMORANDUM

To: Deans, Directors, Department Chairs, Principal Investigators and Administrative Officers of Centers that are Federally Funded

From: Dennis G. Hall, Associate Provost for Research

A handwritten signature in black ink, appearing to be 'DGH', is written over the name 'Dennis G. Hall' in the 'From' field.

March 17, 2003

Clarification of Effort Reporting Certifications

During a recent review of the University's Effort Reporting Policy and after consulting with many of our peer institutions and subject-matter experts, the following clarification to our current effort-reporting policy is warranted. Effective immediately, federally sponsored effort should be certified by either the **individual performing the work or by the project's principal investigator**. It is the responsibility of Principal Investigators to ensure that the work performed is appropriate to the project charged. In the case of an absence, then a designee may sign, provided that designee has firsthand knowledge of the distribution of effort. Firsthand knowledge is defined as having direct knowledge of the work performed.

It is critical that effort (as reported on timesheets and PAFs) charged to federal centers be appropriately distributed and certified as described above. Non-compliance could result in audit disallowances and have serious impact on future federal funding to Vanderbilt University.

Please bring this memorandum and policy clarification to the attention of appropriate faculty and staff in your unit. If there are questions regarding this matter, please contact Jerry Fife in the Office of Contract and Grant Accounting at 3-6658.