

Guidelines for Effort Tracking System

Guideline Statement

The Effort Reporting Tracking System (ETS) was designed to maintain a uniform internal control system for all Weill Cornell Medical College Departments. The ETS will enhance WCMC's ability to comply with federal regulations and institutional requirements regarding effort reporting.

Functionality

1. The ETS will track funded and pending grants as well as institutional awards.
2. The ETS will track actual and committed effort (including all WCMC activities included in effort calculations such as research, teaching, administration, and other activities).
3. The ETS will maintain historical data, an audit trail, and track any effort reductions made to a grant throughout the budget cycle of an award.
4. The ETS will also alert Administrators when Investigators have effort levels exceeding 98%.

Quarterly Audit Reports:

The ETS will facilitate the completion of the Quarterly Audit Reports by supplying the Departments with the ability to generate the following:

1. Notification of investigators with effort percentages over 98%.
2. The total number of faculty in the Department actively involved in research.
3. The total number of staff charged with ETS data entry responsibility and maintenance.
4. Justifications/notes on specified effort modifications including changes in committed effort, effort reductions of 25% or more, and effort associated with K-Awards, etc.

ETS Requirements

1. The ETS includes a complete Coeus generated list as of March 2008 of Departments, Divisions, Investigator Names, Sponsoring Agencies, Initial Grant Numbers and Grant Titles. All WCMC staff who will be responsible for maintaining the ETS at the Department level are listed in ETS.
2. The ETS does not include committed effort that may have been stated on an application or grant proposal. Committed effort data entries will be completed by the Departments. The ETS does not include new grant numbers or new grants entered into Coeus after March 2008.
3. The ETS will require Departmental data input and maintenance.

Last Revised March 2009

How ETS Should Be Used

The ETS should be used to track all effort expended on funded projects including federally funded, non-federally funded, and institutional awards. The ETS will also track effort expended on Other Activities including Administration, Teaching, Clinical, and Other. Pending projects will be tracked in ETS and changed to funded projects upon approval/notice of award from the sponsor. ETS users should be familiar with the Definitions section of this guideline.

Definitions of ETS Worksheet Categories

Funded Grants- any project in which you are expending (or have expended) effort regardless of whether you receive salary or not.

Pending Grants- any project that has been applied for but has not been awarded.

Actual Effort- the time that an employee actually devotes to a particular sponsored project (including time pledged to a sponsor as Mandatory or Voluntary Committed Cost Sharing) or other WCMC activity, expressed as a percentage of Total Effort.

Committed Effort- the amount of effort proposed in a grant or other project application and accepted by a sponsor, regardless of whether salary support is requested for the effort.

Subtotal Actual-the combined total of actual effort on funded projects

Subtotal Committed-the combined total of committed effort that you promised the sponsor and/or government to expend on your funded projects

Other Activities-Administration, Teaching, Clinical, and Other.

Administration- May include but is not limited to recruitment of faculty, selection of graduate students, house staff, medical students, selection and training of support staff, editing professional journals, writing text books/chapters, course and curriculum development, hospital management, committee work, and preparing grant applications.

Teaching-effort expended during classroom instruction provided to students including office hours and counseling but excluding patient care and supervision of residents and fellows.

Clinical-patient care; services to individual patients that are normally eligible to be billed to patients or third parties. Includes training or professional development activities which are intended to improve clinical skills. This category excludes the following patient care activities (a) activities associated with the management of hospital services or administration of hospital activities, (b) patient care associated with research ie, an activity that requires institutional review board (IRB) approval. Graduate Medical education activities related to the supervision and instruction of people enrolled in accredited intern residency and fellowship programs. Among these activities are teaching of clinical procedures, teaching rounds, teaching conferences, and grand rounds.

Accountability

The use of the ETS will be required of all WCMC Departments until SAP, the new effort reporting module, is complete.

Responsibility Matrix

ETS Responsibility Matrix

Legend:
EA = Effort Administrator (1 person per department who is responsible for departmental effort. The contact person for their department to the Office of Research Compliance)
AEA = Associate Effort Administrator (1 or more people in a department who have the same access as the EA, but do not have the reporting/verifying responsibility of the EA)
DEA = Division Effort Administrator (1 or more people in a division who have full access within their division, but no rights outside the division)
SA = Super Admin (Office of Research Compliance)

<i>Activity</i>	<i>EA/AEA</i>	<i>SA</i>	<i>DEA</i>
Add/Delete/Edit SA's (who have access to the system)	No	Yes	No
Add/Delete/Edit EA's (who have access to the system)	No	Yes	No
Add/Delete/Edit AEA's (who have access to the system)	No	Yes	No
Add/Delete/Edit DEA's (who have access to the system)	No	Yes	No
Add/Delete/Edit Departments/Divisions	No	Yes	No
Assign EA's, AEA's, and DEA's to Departments/Divisions	No	Yes	No
Add/Edit Sponsor List	No	Yes	No
Add/Delete/Edit Investigators	No	Yes	No
Assign and edit assignment of departments to investigators	No	Yes	No
View investigators in corresponding departments	Yes	No	No
View investigators in corresponding divisions	Yes	No	Yes
Add/Delete/Edit Grants/Projects for investigators on worksheets	Yes	No	Yes
Add/Delete/Edit Effort percent Data	Yes	No	Yes
Add/Delete/Edit Compensation data (ie, change base salary)	Yes	No	Yes
Run Divisional Reports	Yes	Yes	Yes
Run Departmental Reports	Yes	Yes	No
Run Global Reports	No	Yes	No
View Audit Trail	Yes	Yes	Yes
Maintain system parameters	No	Yes	No

Requesting Changes From Super Administrators

Send all requests to the ets listserve at ets@med.cornell.edu.

Investigator (s) - When you are requesting to add an investigator, please include the following information in your request: Correct Spelling of Investigator Name, CWID, Division/Department.

Sponsor (s)- When you are requesting to add a sponsor, please include the following information in your request: Correct Spelling of the Sponsor Name, Physical Address, type of sponsor (federal, non federal, private, foundation etc.)

Administrator (s)- When you are requesting to add an administrator, please include the following information in your request: Correct Spelling of administrator's name, CWID, Role (Associate Effort Administrator, Divisional Effort Administrator, or Effort Administrator) Please refer to the responsibility matrix in the ETS Guideline for clarification on this.

FAQs

1. My ETS data is incomplete and/or incorrect, where did the ETS data originate? ETS data is a combination of Coeus and Human Resources feeds. The one time feed occurred in March of 2008. Based on the ETS Responsibility Matrix above the ORC can assist departments in updating and correcting data.
2. What components will be included in the Quarterly Audit Reports? ORC staff will send out audit packets 30 days prior to audit deadlines.
3. Will the Office of Research and Sponsored Programs Compliance (ORC) require the investigators to sign the quarterly reports generated by the ETS? Yes.
4. What role will the ORC have in monitoring/controlling the ETS? The ETS should be considered a uniform shadow system controlled by the Departments. The ORC will monitor quarterly reports which will be part of the Quarterly Audit Report.
5. Who will maintain the data in the ETS? The Departments with the assistance of the ORC will make changes to the ETS according to the responsibility matrix above.
6. What type of external scrutiny will the ETS be subjected to, ie, NIH, OIG, DOJ audits? The ETS is not the official record but should reflect consistent and accurate record keeping within individual Departments.
7. What is the relationship between the ETS and the Other Support Page? In the past, investigators sent their Other Support Pages directly to the Grants and Contracts Office, often without the benefit of review by his/her Department Administrator. As of March 27th, 2008, all WCMC Departments will be required to use the Effort Tracking System (ETS) to track the effort of

of any personnel expending effort on any award or sponsored project in their departments. Therefore, the Other Support Page(s) may no longer be submitted by the investigator solely, but instead must be reviewed by the Department Administrator or staff member with ETS responsibilities, (Effort Administrator, Divisional Effort Administrator, or Associate Effort Administrator) this designated person must sign off on the Other Support Page (s) and then forward the documents to the Grants and Contracts Office. If the Grants and Contracts Office receives Other Support Pages without the signature of an Administrator, these documents will be returned to the Department to secure the proper signature. This revised process will help ensure that documentation and recording processes are consistent with each other and meet the essential test of reasonableness.

Contacts

Subject	Contact	Phone	E-mail
Policy questions	Jonathan M. Cohen	(212)-821-0672	joc2050@med.cornell.edu
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Policy questions	Jari Peters	(212) 821-0710	nrp2001@med.cornell.edu
Technical Support	ITS Help Desk	(212) 746-4878	support@med.cornell.edu
ETS List Serve	ORC Staff	ETS@med.cornell.edu	