



OFFICE OF THE VICE PROVOST -
ACADEMIC PERSONNEL AND PROGRAMS

OFFICE OF THE PRESIDENT
1111 Franklin Street, 10th Floor
Oakland, California 94607-5200

December 19, 2022

EXECUTIVE VICE CHANCELLORS AND PROVOSTS

Dear Colleagues:

I write to provide guidance related to grant effort reporting and how to ensure compliance with our external funding obligations. This guidance is written to ensure that the University will continue to comply with external federal grant compliance regulations as articulated in the Uniform Guidance, 2 Certified Federal Register (C.F.R.) Part 200, and elsewhere.

1. Effort Reporting

The University can only charge wages to a federal award under 2 C.F.R. 200 if the federal awarding agency receives commensurate benefits from the wages charged.¹ Hence, campuses need to take steps now to ensure that only wages (and associated fringe benefits), tuition, and fees for work performed by Graduate Student Researchers or faculty in support of a grant are charged to that grant, and that either effort reports or payroll certifications (as applicable to each campus) are accurate. If campuses are unsure whether work was performed on a grant by a Graduate Student Researcher or faculty member, they should make or move charges (wages, tuition, and fees) for that work on an unrestricted account until the PI (or authorized person) can verify the underlying work and confirm accurate effort reports or accurately certify payroll. PIs who have first-hand knowledge that work was performed on the grant do not need to move those charges off the grant. Shifting funds does not impact pay; it only changes what university account is charged for the expense.

Campuses are responsible for identifying unrestricted accounts. For example, campuses could identify a university-level unrestricted account for this purpose. As appropriate, charges can be shifted back to the grant once additional information is obtained regarding the performance of work or, if allowed, once the work is made up. Campuses that use the

¹ Per 2 C.F.R. Part 200, otherwise known as the "Uniform Guidance," wages can only be charged to a federal award if the wages are incurred specifically for the performance of the federal award. The "Uniform Guidance" is comprised of the bedrock federal regulations governing the overwhelming majority of federal research funding to the UC. This includes all NIH, NSF, USDA, DOD, and DOE funding.

Direct costs to federal awards, including wages and salaries, must be both allowable and allocable to be chargeable to federal awards under the Uniform Guidance. "Allowable" direct costs include those that are "necessary and reasonable for the performance of the federal award and allocable thereto." "Allocable" direct costs are those that are incurred specifically for the federal award and that benefit both the federal agency and the University.

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payroll certification methodology may wish to schedule an additional certification for all federal awards covering strike period.

Campuses should work with their Academic Personnel offices to shift funds. Given that these shifts are temporary, it is recommended that changes are made through the salary cost transfer process.

Additionally, federal awards are awarded based on proposed budgets and program plans, and deviations from the agreed-upon budgets and program plans must be approved by the federal awarding agency prior to the deviations occurring as required by 2 C.F.R. 200.308. Campuses should continue to ensure such deviations are approved in advance, as required.

IMPORTANT NOTE: Employees who engage in lawful strike activities are not subject to adverse action as a result of their participation. Adverse action includes, but is not limited to, making appointment decisions based on their participation in strike activity or shifting financial responsibility for fees or tuition remitted by the institution directly to striking student employees due to their participation in the strike. As stated above, PIs may need to shift the expense burden off the grant and onto the campus' budget. Department administrators, PIs, and others with appointment authority are strongly encouraged to review previously provided guidance regarding appointments during this "status quo" period.

2. Default Leave Reporting

Postdoctoral Scholars, Academic Researchers, and hourly Academic Student Employees should continue to submit timesheets and leave reporting through the normal process. Departments should use these time sheets and other standard effort reporting processes to ensure compliance with the Uniform Guidance. As per usual practices, employees who believe that their leave or effort has been incorrectly submitted for November or December should correct previous leave and effort reporting to accurately reflect work performed.

Employees may use PTO, sick, and vacation leave designations consistent with applicable personnel policies and CBA provisions, which define when those leave designations should be used.

Supervisors who have concerns that timesheets have not been accurately reported should consult with their local Academic Personnel office or Labor Relations office.

Additional guidance regarding reporting for Graduate Student Researchers, Academic Student Employees, and Faculty will be provided after the winter break.

Thank you for your cooperation, partnership, and patience during this period.

Sincerely,



Douglas Haynes

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Vice Provost
Academic Personnel and Programs

cc: President Drake
Provost and Executive Vice President Brown
Chancellors
Chief of Staff Kao
Academic Council Chair Cochran
Academic Council Vice Chair Steintrager