EFFORT COORDINATOR GUIDE TO ECRT
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Effort reporting is the federally-mandated process by which the salary charged to a sponsored project is certified as being reasonable in relation to the effort performed on that project. The purpose of effort reporting is to assure that the distribution of pay reasonably reflects actual effort expended. During the course of the year, the University charges salaries to sponsored projects and other projects based on allocation instructions (i.e., the percentage of salary to be charged to one or more sponsored projects or other projects based on committed effort) provided by academic department personnel acting upon instructions from Principal Investigators and others who oversee those sponsored projects. Federal regulations require that throughout the course of the year, these charges be monitored to ensure that any significant change in effort or workload results in a change of the salary distribution. At the close of the fiscal year, an after-the-fact review is required. The Effort Certification and Reporting Technology (ECRT) system was established to meet this requirement by accumulating payroll data. This system facilitates both the monitoring of effort distributions during the year and the required annual certification of effort.

The source for account information (project, project description, PI) is the ARC system. The source of employee information (home department, employee id, uni, job code) is PeopleSoft. **Any changes needed to this information must be made in the source system.**

1. ECRT is accessible directly at [https://ecrt.columbia.edu](https://ecrt.columbia.edu) or through the Effort Reporting website at [www.effortreporting.columbia.edu](http://www.effortreporting.columbia.edu) and click on icon on home tab.

2. Use your uni and uni password to log into the ECRT system.
3. You will be taken to the ECRT Welcome page containing basic information on the ECRT System. Click “Continue” to be taken to the ECRT Home Page

![ECRT System Image](image)

**Work List for Effort Coordinator**

<table>
<thead>
<tr>
<th>Statements awaiting Certification</th>
<th>Effort Tasks</th>
<th>Associated Certifiers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name: Gregory L.</td>
<td>Type: Process Base Effort Statement</td>
<td>Date: 10/4/2019</td>
</tr>
<tr>
<td>Certifications: 1001256512</td>
<td>Type: Process Base Effort Statement</td>
<td>Date: 10/4/2019</td>
</tr>
<tr>
<td>Certifications: 1001256512</td>
<td>Type: Process Base Effort Statement</td>
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</tr>
<tr>
<td>Certifications: 1001256512</td>
<td>Type: Process Base Effort Statement</td>
<td>Date: 10/4/2019</td>
</tr>
</tbody>
</table>

4. The tabs listed will coincide with your role. Up to three tabs may be listed: Statements Awaiting Certification, Effort Tasks, Associated Certifiers.

   a. Statements Awaiting Certification: This will display your effort card only, if your effort card remains uncertified. Note-if you have sponsored effort and require certification, your PI(s) will complete your certification

   b. Effort Tasks: This tab will show for primary effort coordinators only. This will display any cards that have been certified in your department and are waiting to be processed. If there are no effort cards waiting to be processed, this tab will not appear.

   c. Associated Certifiers: This tab will show all effort cards that are still “not certified” in your department(s). You can click on any name, due date, or period of performance to access that effort card. Additionally, you can select the “PI” red button to display the details of that effort card.

5. Notice the navigation tabs across the top of the screen (which coincide with your roles)

6. Notice the helpful links provided on the left navigation pane to provide assistance if needed. The helpful links navigation bar is only available on the homepage. From any other screen, you can access from the top navigation panel.

7. Refer to the rest of this guide for instructions on how to perform functions from this home page.

**TO EXIT ECRT AND SIGN OUT**

8. Select “Sign Out” from the top right corner of the screen.
MANAGING THE EFFORT CERTIFICATION PROCESS

THE TIMEFRAME

Each year, Columbia opens the effort certification period in the fall. Typically, the period runs from early October to late November. By the time the certification period closes, all required certifications must be completed. Each department and school is responsible for ensuring that all of its required certifications are completed by the deadline. Researchers who fail to complete their obligations may not be permitted to submit proposals for new sponsored project proposals and will have their uncertified salary removed from the sponsored account(s).

WHO IS REQUIRED TO CERTIFY?

Every Columbia University employee has an effort card in ECRT. However, a certification is required only for individuals who have effort on one or more sponsored projects. Certifications are triggered based on salary charges to sponsored projects. However, if an individual has committed effort to a sponsored project, but has not drawn salary, they should still submit an effort certification. A ‘certifier’ refers to an individual whose effort must be certified in ECRT. There are two kinds of certifiers: ‘self certifiers,’ who must certify their own effort, and ‘non-self certifiers,’ who must have their effort certified by their Principal Investigator(s). This designation is based on PeopleSoft Job Code. The following Job Codes are self certifiers:

<table>
<thead>
<tr>
<th>Job Code</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>010100</td>
<td>Professor</td>
</tr>
<tr>
<td>011100</td>
<td>Associate Professor</td>
</tr>
<tr>
<td>012100</td>
<td>Assistant Professor</td>
</tr>
<tr>
<td>013100</td>
<td>Instructor</td>
</tr>
<tr>
<td>110100</td>
<td>Senior Research Scientist</td>
</tr>
<tr>
<td>110200</td>
<td>Senior Research Scholar</td>
</tr>
<tr>
<td>111100</td>
<td>Research Scientist</td>
</tr>
<tr>
<td>111200</td>
<td>Research Scholar</td>
</tr>
<tr>
<td>210100</td>
<td>Deputy University Librarian</td>
</tr>
<tr>
<td>210200</td>
<td>Director</td>
</tr>
<tr>
<td>210300</td>
<td>Associate Director</td>
</tr>
<tr>
<td>210400</td>
<td>Associate Director</td>
</tr>
<tr>
<td>210400</td>
<td>Assistant Director</td>
</tr>
</tbody>
</table>

All other job codes not listed above are non-self certifiers and their effort cards must be certified by their Principal Investigators. If an individual is listed as a PI on any active account, but their jobcode does not fall in one listed above, they will be changed to a self certifier and will be required to certify their own effort and the effort of anyone charged to their grant, if applicable.

Exception-All effort coordinators are non-self certifiers. If you have an effort card requiring certification, your effort certification will be completed by your PI(s).

KEY ADMINISTRATIVE ROLES
Primary Effort Coordinator: Primary effort coordinators are departmental administrators who are responsible for monitoring the effort certification progress of their department. Primary effort coordinators perform the final processing of effort cards. By processing the card, the effort coordinator is confirming that any cost transfers or other departmental actions needed, has been or will be undertaken. Only one primary effort coordinator can be assigned for each department/division.

Secondary Effort Coordinator: Secondary effort coordinators can assist in the monitoring of departments, but do not have the ability to view salary information or process effort cards.

There can be multiple secondary effort coordinators assigned to a department/division.

VIEW CERTIFIERS IN MY DEPARTMENT

ECRT provides information about your department on the Department Dashboard. To access the department dashboard, select “Department Dashboard” under the manage section on the blue navigation bar.

If you are an effort coordinator for more than one department/division, you can select another department/division from the drop down box at the top of the page. You can also enter in the department name or number into the box next to the drop down. Wait for the black box to identify your search criteria, select the appropriate result and hit submit. This will take you to that Department Dashboard.

The Department Dashboard breaks down information into 3 tabs:

1. People: provides statistics regarding the number of certifiers whose effort cards are in each status for the most current certification period. “Covered Individuals” provides a list of certifiers associated to your department along with a link to their current and historical effort cards.

   A. Certification Summary Chart: The Certification Summary Chart lists the number and percentage of effort cards that are in the specified status for the department/division you are viewing. If you are responsible for more than one department/division, you must look at each department dashboard separately. The following effort card status’ may be listed:

   - Current Year-Monitor Progress: status for effort cards for next fiscal year. This contains the salary allocation from July 1st of the current fiscal year through today.
   - Not Certified, Not Processed: When the certification period opens, all cards requiring certification will start at this status. This means the card has not yet been certified by the certifier or processed by the effort coordinator.
• **Not Certified, Not Processed, Reopened**: status for an effort card that was certified at one time and then reopened by the effort coordinator during review at the processing stage. This requires the certifier to recertify the effort card.

• **Not Certified, Not Processed, Reopened by Payroll Adjustment Reconciliation**: status for an effort card that was certified at one time and then reopened by Central Administration due to a payroll adjustment that was processed. The payroll adjustment posted caused the certified effort percentages not to equal the payroll percentages and the certifier must recertify the effort card.

• **Certified, Not Processed**: status for effort cards that have been certified by the certifier but is pending review/processing by the primary effort coordinator.

• **Certified, Processed**: status for effort cards that have been certified by the certifier and processed by the effort coordinator. No further action is required.

• **Certified, Processed, Payroll Pending**: status for effort cards that have been certified by the certifier and processed by the effort coordinator, but a payroll adjustment has occurred that must be reviewed by Central Administration. Central Administration will review each transaction and determine if the effort cards must be reopened and recertified or if the transaction can be posted without resulting in required cost transfer.

• **Autoapproved**: status for effort cards that require no certification, as all salary is charged to non-sponsored accounts. ECRT contains payroll information for all employees, resulting in creation of an effort card. At the start of the certification period, all effort cards that do not require certification are set to autoapproved status.

B. **Certifier Information**: Scroll down to the section “Covered Individuals.” This section is broken out into two sections “Sponsored” and “Non-Sponsored.” Click on the ‘+’ next to “Sponsored” to display a list of all individuals charged to sponsored projects. The statements column shows current and historical icons for each effort card for this individual. By scrolling over the icon, you can see the status as well as effort card period. By selecting an icon, you will be taken to that effort card.

2. **Awards and Sponsored Projects**: provides a list of both active and inactive awards associated to your department. **Note that this list shows sponsored projects for this selected department only.** As ECRT only assigns effort coordinators to departments where certifications are required (people assigned), and most sponsored projects are assigned to the lowest level on the department tree, you may find that your tab shows no data.

3. **Department Information**: provides basic information about your department, a listing of effort coordinators with access to your department information, and a breakout of “child”
departments associated to your department. Primary effort coordinators are highlighted in yellow. All others are secondary effort coordinators.
USING ECRT REPORTS TO MONITOR CERTIFICATION PROCESS

Selecting “Reports” from the blue navigation bar will take you to our reporting tool. In addition, some reports are available directly from an individual’s effort card.

- To access the ECRT reports directly from the effort card:
  1) Click on the reports icon above the account listing on the effort card.
  2) Select the desired report. Cost Share reports and payroll reports (PECs only) are available from the effort card. Additionally, you can access a PDF copy of the effort card directly from this screen.

- To access the ECRT reports from reporting tool:
  1) Click on “Report” link from the blue navigation bar.
  2) There are two categories of reports available:
     a. Effort Coordinator Reports-used for monitoring the status of your department.
     b. Payroll/Cost Share-used to obtain details about selected effort cards in your department.
  3) Choose the desired report as outlined in the remainder of this section

Available Reports:

Effort Coordinator Reports:

  A) Status by Certifier Report: this report lists all of the employees in your department(s) along with their effort card status.

  B) Certifier Detail Report: this report breaks down each employee’s effort card by line item, detailing the projects charged and the PI associated to each project. This report will be useful for effort coordinators to determine which PI’s must certify a non-self certifier’s effort card.

Payroll/Cost Share:

  o Note-for all payroll reports, the “Base” payroll type should be selected, as Columbia does not separate out payroll by category in ECRT

  A) Certifier Salary Activity Report: shows all of the salary activity for project staff associated with a given PI for a given 12-month period. This report will be useful for
Effort Coordinators and PIs to monitor the activity of the research staff associated with a PI.

B) **Cost Share Report**: this report displays all of the transactions that were characterized as cost share transactions for a single employee, a department or a specific project.

C) **Payroll Report**: a payroll summary report for a specific individual or department and date range. This breaks out payroll by month.

D) **SPES Report**: this report lists all of the employees that had salary charged to a specific Sponsored Project, along with any certified effort. This report spans the life of the project. **Note that the SPES report will only return information if you are an effort coordinator for the specific department that the sponsored project is assigned to. As sponsored projects are typically assigned at the lowest level of the department tree, and individuals are typically assigned at a higher level, you may not have access in the ECRT system to run this report.**

### STATUS BY CERTIFIER REPORT

1. Select “Effort Coordinator Reports” from category field.

2. Select “Status by Certifier Report” from reports field

3. In the criteria box, enter the end date of the fiscal year you are running report for in the following format MM/DD/YY (ex. 06/30/15) and click ‘run report’.

4. All reports can be exported to Excel, XML, PDF or RTF formats by selecting the appropriate option on the bottom right hand corner of the report. Downloading to excel will allow you to sort the data output.

### CERTIFIER DETAIL REPORT

1. Select “Effort Coordinator Reports” from category field.

2. Select “Certifier Detail Report” from reports field.

3. In the criteria box, enter the end date of the fiscal year you are running report for in the following format MM/DD/YY (ex. 06/30/15) and click ‘run report’.

4. All reports can be exported to Excel, XML, PDF or RTF formats by selecting the appropriate option on the bottom right hand corner of the report. Downloading to excel will allow you to sort the data output.

5. In excel, include a filter on headers which will allow you to sort through the information.
a. Filtering by role: This will allow you to see all of the PI’s who must certify a non-
self certifiers effort card. The “Is Certified” column will indicate which line items
have been certified and which lines still need to be certified.

b. Sorting by status: This will allow you to see which effort cards still need to be
certified and which cards require manual certification, etc.

CERTIFIER SALARY ACTIVITY REPORT

1. Select “Payroll/Cost Share” from category field.

2. Select “Certifier Salary Activity Report” from reports field.

3. Click in “Months” field to select the month and year as the starting point for the
twelve months you would like to see this report run for. Note-If you would like to
review data for the current fiscal year, enter July and prior year.

4. In the “Employee” field, enter the PI’s last name or employee id.

5. Wait for the black box to identify your search criteria and select the appropriate
result.

6. Once the criteria are selected, click on the Run Report button.

7. Scroll down to view the Certifier Salary Activity Report listing all certifiers that met
selection criteria.

8. All reports can be exported to Excel, XML, PDF or RTF formats by selecting the
appropriate option on the bottom right hand corner of the report. Downloading to
excel will allow you to sort the data output.

COST SHARE REPORT

1. Select “Payroll/Cost Share” from category field.

2. Select “Cost Share Report” from reports field.

   • This report can also be accessed directly from the individuals effort card

3. Select the desired radio button for either Dates or Employee Type in the “Date by”
field (either can be chosen and the fields displayed below will automatically adjust
per the selection).

   • If “Dates” radio button is selected per the above step, use the drop down
calendar in the “Start Date” and “End Date” fields to select the appropriate
begin and end dates for the fiscal year. Note-if you do not select July 1st and June 30th, as the start and end dates, respectively, this report will not run.

- If “Employee Type” radio button is selected, the fields below will change. You will need to select an employee type (annual) and select the period from the drop down list.

4. Enter a value in the ‘employee’, ‘department’ or ‘to account’ box.

- You cannot use this report to search on ‘from account’ as we roll all non-sponsored accounts into one line item (000000)

- The system is equipped with smart keys that identify applicable matches to your search selection. If you would like to use employee name, type in the last name of the employee and wait for it to bring up a drop down menu. If you would like to run the list by department, type in at least the first three digits of the desired department. If you would like to run the list by ‘to account,’ type in the project number.

5. Wait for the black box to identify your search criteria and select the appropriate result.

6. Once the criteria are selected, click on the Run Report button.

7. Scroll down to view the Cost Share Report listing all certifiers that met selection criteria.

8. All reports can be exported to Excel, XML, PDF or RTF formats by selecting the appropriate option on the bottom right hand corner of the report. Downloading to excel will allow you to sort the data output.

**PAYROLL REPORT**

2. Select “Payroll/Cost Share” from category field.


- This report can also be accessed directly from the individual’s effort card.

4. Select the desired radio button for either Dates or Employee Type in the “Date By” field (either can be chosen and the fields displayed below will automatically adjust per the selection).
• If “Dates” radio button is selected per the above step, use the drop down calendar in the “Start Date” and “End Date” fields to select the appropriate begin and end dates for the fiscal year.

• If “Employee Type” radio button is selected, the fields below will change. You will need to select an employee type (annual) and select the period from the drop down list.

5. Enter a value in either the employee or department box.

6. Note-the system is equipped with smart keys that identify applicable matches to your search selection. If you would like to use employee name, type in the last name of the employee. If you would like to run the list by department, type in at least the first three digits of the desired department.

7. Wait for the black box to identify your search criteria and select the appropriate result.

8. Once selections are made, click on the Run Report button.

9. Scroll down to view the “Certification Payroll Report” listing all certifiers that met the selection.

10. Click on the tab to choose one of the report formats as follows:

• Account View: shows the salary breakdown for an individual by account.

• Pay Period View: shows the salary breakdown for an individual by pay period.

11. All reports can be exported to Excel, XML, PDF or RTF formats by selecting the appropriate option on the bottom right hand corner of the report. Downloading to excel will allow you to sort the data output.

SPES REPORT

1. Select “Payroll/Cost Share” from the category field.

2. Select “SPES Report” from the report field.

• This report, as mentioned in previous section, can also be accessed directly from the Department Dashboard or the Sponsored Projects Summary page.
3. Select the desired radio button for either Month or Employee Type in the “Date by” field (either can be chosen and the fields displayed below will automatically adjust per the selection).

   • If “Month” radio button is selected per the above step, use the drop down calendar in the “Month” fields to select a date during the fiscal year you are reviewing. (We suggest using June of the current fiscal year)

   • If “Employee Type” radio button is selected, the fields below will change. You will need to select an employee type (annual) and select the period from the drop down list.

4. Enter a value in the ‘Sponsored Project’ box.

   • The system is equipped with smart keys that identify applicable matches to your search selection. Type in the project number.

5. Wait for the black box to identify your search criteria and select the appropriate result.

6. Once the criteria are selected, click on the Run Report button.

7. Scroll down to view the SPES listing all certifiers that met selection criteria.

8. All reports can be exported to Excel, XML, PDF or RTF formats by selecting the appropriate option on the bottom right hand corner of the report. Downloading to excel will allow you to sort the data output.
EFFORT CERTIFICATION

ASSISTING INDIVIDUALS IN CERTIFYING THEIR EFFORT

1. When a self certifier logs into ECRT, they will have one tab listed on their homepage, “Statements Awaiting Certification.”

2. By clicking on the statement owner, due date or status, they will be taken to the certification screen.

   a. The certification screen is broken up into three sections:

   i. Worklist: This section is divided between statements requiring certification, recently completed, and in progress. Active shows current effort cards that are “not certified” for that PI or project. Recently Completed shows effort cards that are “Certified, Not Processed.”
ii. Demographics and Effort Cards: This section displays the demographic information for the researcher selected as well as their current, in progress (for review), and historical effort cards.

iii. Effort Card: This section is the actual effort card that requires certification. See section below listing the columns displayed on the effort card.

b. The bottom portion of the effort card details their salary breakout.

c. There are six columns on the effort card:

i. **Sponsored Projects**-contains the project number and name, as taken from ARC. All non-sponsored accounts are rolled into one line item: 00000000-00 Total Columbia Support.

ii. **Payroll**-this is calculated by dividing the total dollars charged to each project by the total salary for an individual. Note-there may be differences in total salary as ECRT does not include ad-comp payments charged to non-sponsored accounts.

iii. **Cost Share**-NIH over the cap calculations are computed by the Controller’s office shortly before the certification period. A percentage will show in the Cost Share column. Any other type of cost share must be entered by the effort coordinators. See “How to Add Cost Sharing to ECRT” reference guide.

iv. **Computed Effort**-this column is the sum of both the payroll and cost share columns. This is the expected effort of the individual based on their payroll allocation and cost share commitments.

v. **Certified Effort**-this column is completed by the certifier. Note-certified effort must be rounded to the nearest whole percentage.

vi. **Certify Checkboxes**-before hitting the certify button, the certify check box for each account must be marked. Hitting the check box at the bottom of the effort card will ensure all checkboxes are marked.

d. The certifier is able to toggle between $ and % by selection the option on the top right of the effort card. Additionally, they are able to print a pdf or run reports by selecting the icon above the accounts listing.

e. The certifier will enter the appropriate effort percentage (rounded) in the ‘Certified Effort’ column.
f. Ensure that all checkboxes are marked for each account and that the total certified effort equals 100%.

g. Click “Certify”

h. A pop-up box with the certification attestation statement will appear.

i. The certifier must hit “I agree” to complete the certification.

j. The effort card will now be in “Certified, Not Processed” status until the primary effort coordinator for that individual processes the effort card.

**ASSISTING PI’S IN CERTIFYING THEIR RESEARCHERS**

PI’s Certifying Effort of Researchers:

1. Have the PI log in to ECRT using uni and password.

2. The PI will see “Statements Awaiting Certification” tab when they log in. This displays their task list. The task list lists all effort cards that require action by this PI, with their certification always listed on top (if applicable).

3. From the task list, selecting the “PI” red button will list the accounts and PI’s for this selected effort card.

4. Selecting either the statement owner, due date, or status will take them to their certification page. See above for descriptions of sections of certification page.

5. The PI will complete all of their work in the bottom effort card.

   • PI’s have the option to certify for one or multiple (up to ten) researchers at a time. Selecting the icon in the worklist will select the first ten “active” statements. Additionally, they can choose which certifications they would like to certify by holding down the shift key and selecting those researchers’ names.

   • PI’s also have the option to certify for researchers in a specific department or charged to a specific grant by selecting the filter icon.

6. PI should review ‘Payroll’, ‘Cost Share’, and ‘Computed Effort’ columns for effort card(s) selected.

7. Next, they should enter whole numbers in ‘Certified’ column for each project they would like to certify at this time and mark the certified checkbox. Effort cards will remain “active” for this PI until both that PI’s projects have been certified as well as any non-sponsored, if applicable.
8. If the PI is not ready to complete the certification, they can close out of this screen. Changes will only be saved if you select ‘Save’ at the top or bottom of the screen.

9. Selecting ‘Save’ will save changes for anyone for whom you have entered certified effort and the PI will need to select the next researcher in their active work list to continue certifying. Each time a card is certified, it will go back to the first active certification.

10. If the PI is ready to complete the certification, they should select ‘Certify’. If they are certifying for more than one researcher, they should select “Certify All.” Only researchers whose checkboxes are marked will be certified. They do not need to certify every researcher on this page at one time.

11. To complete certification, select ‘I agree’ to the certification attestation statement.

12. After selecting ‘OK’, you will return to first active certification.

CERTIFYING FOR INDIVIDUALS WHO HAVE LEFT THE UNIVERSITY

Unless circumstances make it impossible to do so, faculty should certify their own effort, and PI’s should certify the effort of their staff prior to departure from the University. Where this is not possible, it is permissible for faculty to certify after their departure. In cases where the individual cannot or will not certify after their departure, it is permissible for a Department Chair or another faculty member (e.g. PI of awards where faculty member’s salary was charged) to certify for the individual using suitable means of verification of the individual's activities. These certifications must be completed manually. See reference guides on “Certifying for Individuals Who Have Left the University.”
Once a researcher has certified his/her effort (and, for PIs, the effort of project staff), it is the responsibility of the Primary Effort Coordinator to review what has been submitted and process the effort certification. The review is necessary to identify any salary adjustments that need to be processed.

1. Your “Effort Tasks” tab on the home page will indicate how many certifications are waiting to be processed.

2. Click on the name of the certifier whose effort card you would like to process.
   - This will take you to the effort card where you can review the salary/effort allocations as well as the certified effort.
   - You can print out a copy of the effort card by selecting Effort Card PDF at the top right hand corner.

3. Review the certified effort card for any necessary cost transfers.
   - If the Certified Effort percentage differs from the Computed Effort percentage, ECRT calculates and displays the amount of the resulting variance. If the variance in the “Cost Transfer” column for a sponsored project is negative and exceeds $1,000 and 1%, a salary adjustment must be processed to reduce the charge to the sponsored project. If the difference is less than $1,000, an adjustment is not required (but may be processed).

4. After review, you have three options:
   - If everything looks appropriate, click the “Process” button at bottom to release the effort card into the “Certified, Processed” status.
   - If you need further time to review or discuss with the certifier or PI, click “Cancel,” which will take you back to your effort tasks list to review additional certified effort cards.
   - If you believe the certification is incorrect, click “Do Not Process.” Choosing this option will re-open the card and it will need to be re-certified. We recommend that you notify the certifier prior to selecting this option, explaining why you feel the certification is not correct, so that the same mistake is not repeated.

5. After processing, the item is removed from the task list and the status of the Effort Certification Form is set to “Certified/Processed.”
PROCESSING SALARY ADJUSTMENTS

- ECRT does not process salary adjustments. Any adjustments must be made in Peoplesoft Labor Accounting.

- If Certified Effort on a sponsored project exceeds Computed Effort, transfers to the sponsored account will generally not be permitted as they are subject to the 90 day rule set forth in Columbia’s Cost Transfer Policy.