

Lebanese American University
Title: Timekeeping and Sponsored Program Effort Reporting

Updated July 2022

**1. PURPOSE**

The purpose of this Policy is to establish standards and guidelines regarding timekeeping and Effort Reporting for sponsored Awards and Contracts, as those terms are defined below. For purposes of this Policy, unless stated otherwise, use of the term Award includes Subawards and Award Subcontracts, and the term Contract includes Subcontracts.

**2. Terms and Definitions**

The following terms shall have the meanings indicated below for purposes of this Policy, regardless of whether the terms are capitalized:

- Award – sponsored awards including illustratively U.S. grants, cooperative agreements, and any other financial assistance from an Awarding Agency. U.S. Federal agreements are subject to [2 CFR Part 200](#).
- Award Subcontract – A subcontract issued under an Award strictly for the purchase of property or services needed to carry out the performance of the Award. This term does not include an agreement that qualifies as a Subaward (i.e., an agreement to actually carry out part of the Award scope of work). See “Procurements, Subawards, and Subrecipient Monitoring” Policy for further explanation of the differences between a Subaward and an Award Subcontract.
- Awarding Agency - The department or agency that solicits and enters into an Award or a Contract.
- Contract, including FAR ones, – Any contract awarded to LAU by an Awarding Agency for the acquisition of goods or services and that is subject to the general acquisition regulations of the awarding agency, such as the FAR in the case of U.S. Federal contracts.
- Cost – As further defined in Section 4 below, the term includes all costs incurred in connection with an Award or Contract, charged directly or indirectly to an Award or Contract, and/or which LAU claims as part of a Cost Share for an Award.
- Cost Principles - As defined in Section 5 below. For purposes of this Policy, they are requirements that govern the treatment and accounting of Costs related to Awards and Contracts.
- Cost Share or Cost Sharing – Some Awards are cost sharing Awards, which means LAU will only be paid or reimbursed an agreed-upon portion of its costs to perform the Award. The portion not paid with the awarding agency funds is the Cost Share.
- Federal Acquisition Regulation or “FAR” – The regulations in Title 48 of the Code of Federal Regulations implementing uniform policies and procedures for acquisitions by Government executive agencies.
- LAU –refers to Lebanese American University.
- Sponsored Program – A program funded at least in part with an Award or Subaward.

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- Subaward – An agreement issued under an Award by the Awardee to a Subawardee, or made from one Subawardee to another, to carry out part of the performance of an Award. It does not include an agreement by which an Awardee or Subawardee merely purchases property or services needed to carry out the Award. See “Procurements, Subawards, and Subrecipient Monitoring” Policy for further explanation of the differences between a Subaward and an Award Subcontract.
- Subcontract – A subcontract issued under a Contract for the purchase of property or services needed to carry out the performance of a Contract.

### 3. **RESPONSIBILITY**

3.1 It is the responsibility of LAU and its departments, faculty, staff and all individuals working on sponsored programs to fully comply with this Policy. It is imperative that each person with such responsibility reviews, understands, and complies with this Policy. Violations may result in severe consequences to LAU and all individual violators.

3.2 The Office of Grants and Contract is responsible for the maintenance and general oversight of the Policy in particular:

- Coordinating with Human Resources and Finance Department to properly educate all LAU faculty, staff, and other employees on the Policy and its purpose;
- Updating the Policy as necessary to address changes in applicable Awards, Contracts, and/or regulations;
- Oversee the implementation of the Policy through coordination with Human Resources and Finance Department.

○ Any questions concerning this Policy should be directed to the following, in this order:

- Departmental supervisor;
- Office of Grants and Contracts.

### 4. **SCOPE / APPLICABILITY**

As set forth above, each employee has the responsibility to accurately track and report effort expended on Sponsored Awards and Contracts. However, the method for doing this differs depending on the type of faculty and/or staff and the project, as generally described below:

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4.1 For Awards and Sponsored Programs, unless otherwise required by the awarding agency, the following categories of employees will report effort using the templates defined and attached to the corresponding procedures:

4.1.1 Exempt staff or faculty are required to fill a certification of effort as per set procedures. Exempt staff and faculty are ones that earn a fixed remuneration irrespective of the number of hours within the approved job description fulfilled per month and therefore do not qualify for overtime;

4.1.2 All other employees, non-exempt staff, involved with Awards, and all employees charging time to Contracts (including faculty and salary-based employees when so required by the awarding agency), must utilize hourly time sheets. Non-exempt staff must fill a timesheet as per template in the set procedures. Non-exempt staff are employees who typically are paid a salary based on the number of hours served in a particular month, or a fixed monthly salary but may be typically subject to overtime pay as per applicable university procedures or regulations, and/or deductions if the number of fulfilled weekly/monthly hours is not met.

**5. STATEMENT OF POLICY**

5.1 As set forth in and required by the applicable Cost Principles, salaries and wages charged to an Award or Contract directly, indirectly, and as part of the awarding agency's share or Cost Share, must be accurately and personally tracked, recorded, and allocated in order to comply with this Policy, its Procedure, applicable laws and regulations, and the awarding agency's terms and conditions. All faculty, staff, and other employees must completely, accurately, and timely record and verify individual timekeeping and effort records for this purpose and ensure timely submission of the records to the concerned offices as per set procedure.

5.2 All faculty, staff, and other employees must adhere with any additional timekeeping requirements set forth by the awarding agency under the sponsored awards they implement.

5.3 This Policy and the Procedure implementing this Policy provide strict guidelines regarding the recording, submission, and review process for time sheets and Effort Reporting to ensure that all time and effort related to sponsored awards are accurate, allowable, and allocable.