MEMO

Date: March 8, 2011

To: All Department, Center and Institute Chairs
College of Medicine and Health Sciences

From: Catherine R. Lucey, MD FACP
Interim Dean

Clay B. Marsh, MD
Vice Dean of Research for the College of Medicine

Re: Certification of effort and PETS – suspension of purchases on all projects of noncompliant personnel

The Requirements and the Issue
The federal government mandates that universities receiving grants and contracts compile and certify activity reports that reflect how employees working on sponsored research have spent their time. OSU uses a centralized, electronic system (e-Cert) to certify effort on a quarterly basis. The federal government also requires that personnel expense transfers (PETs) be certified by the investigator. These certifications are also submitted using an electronic process.

Since these electronic certification systems were implemented, the College of Medicine has diligently followed up with individual faculty and staff with outstanding certifications and emphasized the importance of complying with the federal mandate. However, the College has consistently had a large number of employees with effort or PET certifications that are outstanding by at least 45 days, placing the university at risk of significant fines, the imposition of more onerous effort certification guidelines and disallowance of costs.

Policy to Mitigate the Issue
To address this issue the College of Medicine is implementing a monthly review of uncertified e-Cert and PET reports older than 45 days. The College of Medicine is requesting that the Office of Sponsored Programs suspend all purchases on all of the projects of investigators who have uncertified effort or PETs reports older than 45 days. For staff appointed to projects who have not certified their effort, all COM/OHS projects to which that person is appointed will be suspended with regard to purchases. When the outstanding effort and PET certifications have been completed, the investigator must contact the College of Medicine, and the affected projects will be released from suspension.
Notification Process
The Office of Sponsored Programs notifies the campus when effort for the previous quarter must be certified. A second notice is sent at the end of the subsequent month. Spending authority on projects will be suspended starting two weeks from the issuance of the second notice. Uncertified PETs will be reviewed each month and a list of overdue PET certifications sent to departments. Projects will be suspended if PIs have not taken satisfactory action within two weeks of this notice.

Initial Implementation of the Policy
The College of Medicine will immediately implement the policy with regard to uncertified effort and PETs reports older than 45 days. For this first effort, faculty will be notified by the College of Medicine Office of Research that they have outstanding certifications that are subject to the new policy. Certifications must be completed or good faith effort made to rectify errors preventing certification within two weeks of notification.

Determining Which Certifications are Late
To determine if any of your faculty or staff have uncertified effort or PETs, please visit http://osp.osu.edu/etools/ and log into the “All Uncertified E-Cert Reports” and “All Uncertified PET Justifications” tools using your OSU username (name.#) and password. Employees subject to implementation of project suspensions will be found in the “older than 45 days” reports. Alternatively, Karla Gengler-Nowak in the College of Medicine Office of Research (Karla.Gengler-Nowak@osumc.edu or 292-7936) will be happy to send you a list of delinquent reports.

College of Medicine Office of Research Contact for Help or Questions
Staff in the College of Medicine Office of Research can help faculty and staff review and understand the information they are required to certify. Please contact Karla Gengler-Nowak with any questions about this policy or the e-Cert or PET certification processes. She is also available for consultation if there are any concerns about the accuracy of the information to be certified and she will be the contact for release of suspended projects.