



**Administrative Council  
Midwestern State University  
Approval via Electronic Vote**

**October 31, 2025**

**Meeting No. 26-02**

The Administrative Council approved the policies listed below via email during the voting period October 24, 2025 – October 31, 2025. Notification of approval was received from the following members: Dr. Marcy Brown Marsden, Ms. Dawn Fisher, Ms. Ashley Hurst, Mr. Kyle Owen, Mr. Matthew Park, Ms. Megan Riedel, Dr. Dawn Slavens, Mr. Jeff Spoeri, Mr. Chris Stovall, and Mr. Kyle Williams.

- I. MSU OP 36.03: Electronic Facilities Access Control
- II. MSU OP 56.09: Effort Reporting and Certification for Grants, Contracts, and Other Sponsored Agreements

  
Stacia Haynie, Chair

  
Betsy Tucker, Secretary



MIDWESTERN STATE UNIVERSITY

## Operating Policies & Procedures Manual

### University Operating Policy/Procedure (“OP”) OP 36.03: Electronic Facilities Access Control

<b>Approval Authority:</b>	President
<b>Policy Type:</b>	University Operating Policy and Procedure
<b>Policy Owner:</b>	Vice President for Enrollment Management and Student Affairs; Vice President for Administration and Finance; and Chief Information Officer
<b>Responsible Offices:</b>	Clark Student Center; Facilities Services; Information Technology; Redwine Student Wellness Center; and Residence Life and Housing
<b>SACSCOC Standard(s):</b>	13.8 (Healthy, Safe, and Secure Environment)
<b>Next Scheduled Review:</b>	10/01/2027

#### I. Policy Statement

This OP establishes standards and guidelines to be followed for electronic access control to campus facilities utilizing the campus card at Midwestern State University ("MSU" or "University"), a component institution of the Texas Tech University ("TTU") System.

#### II. Reason for Policy

The purpose of this policy is to provide guidance and responsibilities for the management and oversight of the electronic facilities access control system at MSU. This policy exists to ensure that an individual, department, or program within the scope of this policy is aware of their respective responsibilities for electronic facilities access control. This policy helps provide a safe and secure campus environment through the control of electronic facility access permissions.

Universities are targets of theft from both internal and external threats. Access to MSU buildings and facilities is a privilege, not a right, and implies user responsibilities and accountability.

Electronic facilities access control is essential for providing access security, protection, and convenience by limiting the number of physical keys issued for campus facilities, and, therefore, more efficiently and effectively managing access to facility locations. The issuance of physical keys to doors with electronic access security should be limited to individuals determined essential by an Administrative Head or Building Owner (refer to MSU OP 36.01: Key Authorization).

### III. Definition and Abbreviations (specific to this policy)

**Building Access Manager (“BAM”):** An employee designated by a Building Owner to have responsibility for authorizing electronic access control schedules and managing membership of Patron Access Groups for the building using the Software Platform.

**Building Owner:** The individual responsible for overseeing electronic access to a campus building or facility. This individual can be designated by the President, but is generally an employee who has the primary responsibility for the operation of the building or largest department occupying a building, such as a Vice President, Dean, Associate Vice President, Director, Chief of Police, etc. Department Chairs, Assistant Directors, Coaches, etc. are not considered Building Owners. Refer to Building and Building Owner Listing in Section VI of [MSU OP: 36.01: Key Authorization](#) for information on building owners for specific buildings.

**Campus Card:** The official identification card of Midwestern State University, issued by the Clark Student Center, and used for current students and employees to gain access at an Electronic Access Security location based on the unique permissions granted to the individual through the Software Platform (refer to [MSU OP 52.02: Campus Card](#)).

**Clark Student Center (“CSC”)**

**Electronic Access Security (“EAS”):** An electronic or electro-mechanical locking device in a building or facility that can be controlled (unlocked, locked), programmed or reprogrammed (users and schedules added, modified, or removed) through the Software Platform from a site that is remote from the device.

**Facilities Services (“FS”)**

**Information Technology (“IT”)**

**Patron Access Group (“PAG”):** A group of individuals (students, faculty, staff, alumni, contractors, guests, etc.) in the Software Platform granted with permission to access an EAS location utilizing their Campus Card based on a defined access schedule in the Software Platform.

**Principle of Least Privilege (“POLP”):** An information security concept in which a user is given the minimum level of access – or permissions – needed to perform their University-authorized responsibilities or approved functions.

**Software Administrator:** A unique user role with full unrestricted access to the Software Platform. As a result, this role carries substantial responsibility and accountability. This role is generally limited to select full-time staff in the Clark Student Center and Information Technology, as assigned by the Associate Vice President for Student Affairs and Dean of Students, and Chief Information Officer, or their designee(s).

**Software Platform:** The approved sole source Software Platform utilized by MSU for programming the electronic access control system.

**University Information System of Record (“UISR”):** The comprehensive database of student and employee records and information maintained by MSU.

## **IV. Procedures and Responsibilities**

### **A. General Guidelines**

1. At no time is it permissible for campus users to do the following. Violators will be subject to potential disciplinary procedures as set forth in University operating policies and procedures.
  - a. Prop a door with electronic access control open unless specifically authorized or instructed to do so by a Building Owner or BAM.
  - b. Use another person’s campus card to access a campus facility.
  - c. Loan one’s campus card to another person in order to provide them with access to a campus facility.
  - d. Tamper with or damage EAS devices, hardware, or cabling.

### **B. Software Platform**

1. The Software Platform controls the functions of EAS locations at MSU. Features include UISR data synchronization through a one-way data feed occurring each weekday, and single sign-on access authentication for approved users.
2. User access to the Software Platform shall be designed and implemented on a PoLP. Software users shall only control and program specific aspects of the software based on their approved user role.
3. To the extent possible, patron data within the Software Platform shall populate through the UISR data synchronization process.
4. The use of manual file (e.g. Excel) imports for loading data into the UISR for migration into the Software Platform, must occur in a format approved by IT. Manual file imports may be utilized for instances such as creating initial student patron records for new student orientation sessions, housing move-in preparation for early arrival athletes or entering students not yet registered for courses, break housing periods, and setting access flags within the software for individuals as approved by a Building Owner.
5. Manual coding of individual patron data in the software should be limited and occur only in instances when an automated data feed from the UISR is not viable. Such instances must be approved by a Software Administrator.

### **C. EAS Installation**

1. Requests for new or updating existing EAS locations should be submitted/forwarded by a Building Owner to IT, who will then usually contact/consult with FS, review the request, establish a list of requirements, gather necessary information, and IT will prepare an estimate for the installation

cost (e.g. including any hardware, setup/programming, annual license fees, networking, other infrastructure costs, etc.).

2. All new or updated EAS locations are required to interface with the existing Software Platform.
3. Installation costs, as well as maintenance, repair, or replacement expenses of existing EAS locations, are the responsibility of the requesting unit or department in which the EAS is located. Prior to installation or expense encumbrance, IT or Facilities Services shall communicate the nature of any estimated costs to the requesting unit or department. New hardware is quoted and ordered by IT.

#### **D. Roles and Responsibilities**

The electronic facilities access control system at MSU functions in a decentralized manner, in which the following units or positions have administrative, managerial, and/or operational responsibilities.

1. Clark Student Center (“CSC”): Responsibilities include operating the Software Platform for device-level programming including electronic access control schedules, managing the production of campus cards, assigning user access to the Software Platform, and providing software training for users.
  - a. Programs user access to the Software Platform based on POLP.
    - The CSC Assistant Director, or designee, shall review user access accounts and user-based permissions for the Software Platform on a semesterly basis to ensure accuracy of the accounts.
  - b. Programs EAS schedules (e.g. door lock/unlock hours of operation, special holiday closures) in accordance with MSU OP 74.01: Building Use Policy – General University or as directed by a Building Owner or BAM.
    - Includes the assignment of access schedules to PAGs for a building as directed by a Building Owner or BAM.
    - Maintains a record of access schedule requests submitted by Building Owners or BAMs.
  - c. Provides initial and recurring training to authorized university personnel (Residence Life and Housing, Redwine Student Wellness Center, University Police, Central Plant) and BAMs on use of the Software Platform according to their respective user access permissions.
  - d. Manages the campus card inventory, production, and distribution process for students, employees, authorized guests and contractors.
  - e. The CSC, in consultation with IT, serves as a primary liaison to the contracted Software Platform vendor for software service and support requests.

2. Facilities Services (“FS”): Manages the maintenance of EAS hardware (door hardware, locking devices, building door controllers, door power supplies, card readers, etc.), be it directly or through supervision of an approved vendor.
  - a. Consults with IT and CSC personnel to ensure the proper functioning of EAS hardware as controlled by the Software Platform. Coordinates or performs necessary repairs, including replacement and repair of physical hardware at a door, consistent with FS departmental procedures as appropriate for facility operating continuity.
  - b. In the case of a power loss or controller malfunction at an EAS location in a non-housing facility that results in a locked door that cannot be appropriately unlocked through the Software Platform or accessed using the Campus Card, Facilities Services shall enact available interim physical access and safety measures, as needed for facility operating continuity, and communicate such measures to the Building Owner in a timely manner.
  - c. Maintains the available spare parts hardware inventory of controllers and readers for repair work orders. Any hardware necessary for a repair that is not available in spare parts inventory shall be communicated to IT for procurement.
3. Information Technology (“IT”): Responsibilities include administering the server, database, software to include server-level and system architecture programming, control hardware (only contained with IT closets), and networking infrastructure through which the electronic facilities access control system and Software Platform function, be it directly or through supervision of an approved vendor.
  - a. Manages UISR data feeds and advanced script imports into the Software Platform, manual file imports into the UISR, and the single-sign integration for user access into the Software Platform.
  - b. Provides maintenance and support updates to the server, Software Platform, data architecture, and control hardware to include ordering new access technology hardware.
  - c. Manages network connectivity to EAS locations.
  - d. Consults with Facilities Services and CSC personnel to ensure the proper functioning of EAS hardware as controlled by the Software Platform. Coordinates or performs necessary repairs consistent with departmental procedures for facility operating continuity.
  - e. Receives and responds to campus requests for the installation of new or updated EAS locations.
  - f. Fully controls access to the University data center, including managing the data center PAG membership.
    - A review of the data center PAG membership shall occur at least monthly by an IT Software Administrator.

- Only IT Software Administrators are permitted to edit the data center PAG and access control schedule.
  - g. IT, in consultation with the CSC, serves as a primary liaison to the contracted software vendor for server and software maintenance and support requests.
  - h. IT personnel shall check for patches and related updates to the Software Platform and server on a semi-annual basis. Regular (no cost) patches/updates shall be implemented when available. Should a major Software Platform adjustment be necessary or recommended, the information and corresponding recommendation should be communicated to the Policy Owners for review and planning by the Chief Information Officer.
4. Redwine Student Wellness Center: Manage electronic access to the Wellness Center, including guest membership card permissions.
- a. Creates and updates guest patron membership information in the Software Platform, including the start and expiration date for guests to have their card-based access to the gym.
    - Guest patrons receive their campus card from the Clark Student Center Information Desk after their patron membership has been created.
  - b. Creates and updates access schedules for the Wellness Center, including holidays, breaks, and intersession periods.
  - c. Reports any EAS problems occurring in the facility to CSC to verify if the software is operating correctly before contacting FS and IT to send technicians to investigate.
  - d. The Executive Director of Student Wellness is authorized to contact the Software Platform vendor for support when a support request cannot be addressed by CSC, FS, or IT personnel.
5. Residence Life and Housing (“RLH”): Manages electronic access to MSU housing facilities for students residing on campus, RLH staff, and residential guests.
- a. Works with IT to provide up-to-date housing roster information into the UISR for import into the Software Platform in a timely manner.
    - A data feed from the housing software into the UISR shall be completed each weekday to include student housing status and building/room assignment, which subsequently feeds into the Software Platform for access control. RLH is responsible for confirming the functioning and accuracy of the data feed from the housing software with IT at the onset of each semester for housing opening.
    - Utilizes manual file imports of data into the UISR for extenuating circumstances when electronic access to residential housing facilities cannot be effectively accomplished through the housing data feed into the UISR. Such instances include break housing, summer guest housing, and situations when a student is residing on campus, but is not yet coded in the UISR as an active enrolled student.



- b. Reviews the access control schedules for EAS locations in residential housing facilities at the onset of each fall and spring semester, and communicates any changes needed to the CSC Assistant Director.
        - c. Unless approved by the Director of RLH, exterior entrances to housing facilities shall remain locked at all times, with the exception of the Market Street Learning Commons at Legacy Hall, and RLH Administrative Office in Sunwatcher Village.
          - In special situations when an exterior entrance to a housing facility should be unlocked, the Director of RLH will communicate the unlock schedule to the CSC Assistant Director and Chief of Police at least two business days in advance.
        - d. Reviews the membership of all RLH PAGs establishing access to residential housing facilities and makes appropriate membership edits, on a semesterly basis, or more often as appropriate for RLH operations.
        - e. Manages the issuance of guest access cards (e.g. summer camps, early arrivals, temporary overnight guests, etc.). Conducts an inventory of guest access cards at least annually. Communicates any needs for new or re-printed guest access cards to the CSC Assistant Director.
        - f. Manages urgent changes to patron access permissions for residential housing facilities occurring outside of normal business hours.
        - g. The RLH on-call staff member should be contacted if electronic door access problems occur in residential housing facilities on evenings, weekends, holidays, and other periods outside of normal business hours.
          - If an EAS location is unable to be restored and will result in a security risk, the on-call RLH staff member shall notify University Police.
          - In the case of a power loss or controller malfunction to an EAS location in a residential housing facility, which results in a locked door that cannot be otherwise accessed using the Campus Card, the Director of Residence Life and Housing (or designee) shall enact available interim physical access and safety measures for resident access to their respective housing facility until the power is restored. An example interim measure could be to prop the door in question with a safety monitor placed at the location.
6. Building Access Managers: Manage the membership of PAGs for electronic access to their building and communicates access schedule information for EAS locations within their building to the CSC.
  - a. Adds and removes patrons from building-affiliated PAGs using the Software Platform.
  - b. Reviews building-affiliated PAG membership on a semesterly basis, at minimum, as appropriate for the building's operations.
  - c. Communicates access schedule requests for EAS locations within their building to the CSC.



- d. Reviews building access schedules for their respective building on a semesterly basis, at minimum, as appropriate for the building's programs and operations.
  - e. BAMs should regularly inspect EAS locations in their building to ensure proper system functioning and that building users are not bypassing the access control system (e.g. propping doors, entry tailgating, etc.). Should an EAS location be malfunctioning, it should be reported to the CSC to verify if the software is operating correctly before contacting FS and IT to send technicians to investigate.
  - f. Building Owners and BAMs shall submit Software Platform access request forms to the CSC for new software users or user changes.
7. University Police Department ("UPD"): Respond to facilities access situations outside of normal business hours when FS, IT, and CSC personnel are not available.
- a. UPD should be contacted at 940-397-4239 if electronic access issues occur in academic or general buildings, (e.g. non-residential housing facilities) on evenings, weekends, holidays, or other periods outside of normal business hours.
    - UPD shall enact available interim measures to secure a malfunctioning EAS location, and notify FS, IT, and the CSC the next business day of the issue and any interim action taken. If UPD is unable to secure a building, Facilities Services will be contacted for assistance and UPD shall monitor the location until business hours resume or the location is secured.
    - Should a patron fail to gain entry to an authorized EAS location due to a lost, damaged, or inactive campus card, they should be referred to the CSC for resolution during normal business hours.
    - If a patron is a housing resident who is unable to access their assigned residence hall or apartment, they should be referred to the RLH office during normal business hours, or referred to the Legacy Hall Commons Service Desk for after-hours assistance.
  - b. Monitors membership of police-affiliated PAGs on a semesterly basis and reports any changed needed to the CSC Assistant Director.
8. Office of the Registrar and Office of Human Resources: Update student and employee records in the UISR.
- a. Data updates to student or employee records, which will likely result in a change to the individual's electronic facilities access permissions, should be processed in a timely manner, in order to be picked up by the next automated data feed from the UISR into the Software Platform.
    - Should a change in a student's or employee's status require immediate modification of the individual's electronic access permissions, the Office of the Registrar or Office of Human Resources shall promptly notify

University Police and the CSC. Residence Life and Housing should also be notified if the individual is a student.

**E. Holidays and Break Periods**

1. During holidays when the University is closed, all EAS exterior locations shall be locked. Any exception requests, including the proposed unlock schedule and related EAS locations for a building, shall be submitted by a Building Owner or BAM to the CSC Assistant Director, in writing, at least two business days in advance of the holiday start.
2. During break and intersession periods, all EAS exterior door locations for academic and general facilities shall be unlocked to correspond with University business hours. Any exception requests, including the proposed access schedule and related EAS locations for a building, shall be submitted by a Building Owner or BAM to the CSC Assistant Director, in writing, at least two business days in advance.

**F. Software Platform Training**

Formal Software Platform training is essential for employees with responsibility for managing and supporting electronic facilities access control.

1. Initial User Training: The Assistant Director of the CSC shall provide and document initial training for new Software Platform users.
2. Ongoing User Training: The Assistant Director of the CSC shall provide and document ongoing training for existing Software Platform users. Ongoing training shall be offered on an annual basis.
3. Software Administrator Training: Employees designated as software administrators shall receive initial Software Platform training from an existing software administrator. Following demonstration of general proficiency, a combination of eLearning and/or vendor-led training will be utilized for advanced administrative functions. The Associate Vice President for Student Affairs & Dean of Students, Chief Information Officer, or their designee, shall be responsible for arranging vendor-led training for software administrators, pending budget availability, in a timely manner.

**G. Campus Card**

The responsibilities of students and employees for use of their campus card, including protocols for obtaining a campus card, card replacement, and card reporting are governed in [OP 52.02 \(Campus Card\)](#).

**V. Related Statutes, Rules, Policies, Forms, and Websites**

Related MSU Policies:

[MSU OP 36.01: Key Authorization](#)

[MSU OP 52.02: Campus Card](#)

[MSU OP 74.01: Building Use Policy – General University](#)

Related MSU Handbooks:

[Student Handbook – Part I, Section 5: Code of Student Conduct: The Rules; Part II, Student Identification](#)

[Residence Life and Housing Handbook – Building Access Policy](#)

## **VI. Responsible Offices**

Clark Student Center

Phone: 940-397-4224

E-mail: [csc@msutexas.edu](mailto:csc@msutexas.edu)

Facilities Services

Phone: 940-397-4228

E-mail: [aavpfs@msutexas.edu](mailto:aavpfs@msutexas.edu)

Information Technology

Phone: 940-397-4278

E-mail: [helpdesk@msutexas.edu](mailto:helpdesk@msutexas.edu)

Redwine Student Wellness Center

Phone: 940-397-4466

E-mail: [angie.reay@msutexas.edu](mailto:angie.reay@msutexas.edu)

Residence Life and Housing

Phone: 940-397-4217

E-mail: [housing@msutexas.edu](mailto:housing@msutexas.edu)

## **Revision History**

11/11/2025: Adopted and approved by MSU President Stacia Haynie as University Policy and Procedure (“OP”) 36.03: Electronic Facilities Access Control.



MIDWESTERN STATE UNIVERSITY

## Operating Policies & Procedures Manual

### University Operating Policy/Procedure (“OP”)

#### **OP 56.09: Effort Reporting and Certification for Grants, Contracts, and Other Sponsored Agreements**

<b>Approval Authority:</b>	President
<b>Policy Type:</b>	University Operating Policy and Procedure
<b>Policy Owner:</b>	Provost and Vice President for Academic Affairs and Vice President for Administration and Finance
<b>Responsible Office:</b>	Office of Sponsored Programs and Research and Business Office
<b>Next Scheduled Review:</b>	03/01/2030. This OP will be reviewed in March every five (5) years, or as needed, by the Provost and Vice President for Academic Affairs and the Vice President for Administration and Finance and forwarded to the President as needed.

### **I. Policy Statement**

Midwestern State University (“MSU” or “University”), a component institution of the Texas Tech University (“TTU”) System, will maintain a system of personnel activity reporting (“Effort Reporting and Certification”) in accordance with the provisions of Title 2, CFR Part 200. These effort reports will verify personnel costs charged to or provided as committed cost sharing for a sponsored project are documented, reasonable, allocable, consistently treated, and allowable under the specific sponsored agreement.

### **II. Reason for Policy**

The purpose of this policy is to address the Title 2, *Code of Federal Regulations* (“CFR”), Part 200 requirements for the documentation and certification of personnel activity under a federally funded grant, contract, or other sponsored agreement.

### **III. Application of Policy**

#### **A. Effort Report**

Individuals with full-time faculty or professional staff appointments must complete an effort report if they:

1. Are paid from a sponsored project account; and/or

2. Contribute time to a sponsored project (salary cost share or match).

## **B. Professional Duties**

Faculty and staff are appointed by the university to perform a set of duties encompassing all forms of academic work. The University does not specify the number of hours per week a faculty or staff member must work; rather, there is an expectation that the employee will work the hours necessary to carry out the professional responsibilities of the position. Faculty and staff should apportion their effort based on the composite of all activities performed as part of their University appointment.

Faculty and staff may engage in consulting for entities outside the University in accordance with *MSU OP 06.09: Outside Employment of Faculty*. Effort expended on such consulting is in addition to University responsibilities, and, therefore, excluded from total effort.

## **C. Committed Effort**

Levels of effort proposed in any sponsored project application should be consistent with the actual effort that each individual is expected to expend on the project during the relevant performance period(s). The amount of salary support requested normally should be determined by multiplying the proposed level of effort by the individual's IBS. In some cases, the amount of requested salary support may be less than this amount. In no event should the requested salary exceed the amount determined by multiplying the proposed level of effort by IBS.

## **D. Maximum Effort**

The total of committed effort in awarded sponsored projects should never exceed 100 percent. In the event that committed effort exceeds 100 percent, effort on one or more projects must be reduced (as discussed below).

## **E. Changes in Commitment Level**

Once MSU and the sponsor execute an award agreement, the PIs must provide the level of effort to which they have committed.

1. A 25 percent or greater reduction in the level of committed effort for the PI must be approved prior to the change and in writing by the sponsor. It is not sufficient to simply communicate the change to the sponsor.
2. An increase in effort of greater than 25 percent for the PI should be reviewed to assess whether the scope of work for that project has changed and to assess possible impacts on the individual's ability to meet commitments to other sponsored projects. Any change in the scope of work must be approved prior to the change and in writing by the sponsor.

PIs should contact the Office of Sponsored Programs and Research if significant

changes in commitment are anticipated to ensure the change is approved by the agency, if required.

#### **F. Individuals Who Must Certify**

Each effort statement must be certified by a responsible person with suitable means of verification. MSU's policy is:

1. PIs and faculty certify their own effort.
2. PIs certify the effort of all non-faculty and students who work on their projects.
3. For students who work on multiple projects, each PI will certify the effort on his/her own projects.
4. For some large grants, the PI may not have suitable means of verifying the effort for all of his/her sponsored project staff, and the PI must identify an alternate certifier. Once identified, the PI must notify the Grants Accountant and Office of Sponsored Programs and Research of the alternate certifier.

#### **G. Certification Timeline**

Effort for all employees must be certified three times per year within 30 days of when the effort reports are distributed.

### **IV. Definitions (specific to this policy)**

**Certify:** To attest authoritatively as being true; to confirm accuracy.

**Committed Effort:** The level of effort proposed in a sponsored project application. It should be consistent with the actual effort an individual is expected to expend on the project during the relevant performance period(s). Committed effort offered to a sponsor in the proposal documents over the life of an award that is specified and quantified and becomes a binding commitment upon execution of the award agreement.

**Cost share:** The portion of total costs of a sponsored project that is paid by the university or a third party rather than the sponsor.

**Effort:** The proportion of time spent on any activity expressed as a percentage of total professional duties.

**Institutional Base Salary ("IBS"):** The annual compensation paid by the University for all professional activities related to the position, including instruction, research, service, administration, and other institutional activities. IBS excludes fringe benefits, reimbursed expenses, and temporary supplemental compensation for incidental work. For employees with less than full-time appointments, IBS will be calculated on a full-time equivalent ("FTE") basis. In no event should IBS be increased as a result of replacing institutional salary funds with sponsored project funds. For employees on a nine-month appointment, regular summer appointments are part of IBS and included in effort certifications. These individual's rate of pay for summer work is based on the nine-month academic year

salary rate.

**Labor redistribution:** An after-the-fact transfer of salary and fringe benefit costs, for past pay periods, from one account to another.

**Sponsored project:** The grant, contract, or cooperative agreement funds under which the university agreed to perform a certain scope of work according to specified terms and conditions, and for a specific budget monetary compensation, as well as related committed cost share companion funds.

## V. Procedures and Responsibilities

### A. Individuals who must certify

Individuals with full-time faculty or professional staff appointments must complete an effort report if they:

1. Are paid from a sponsored project account; and/or
2. Contribute time to a sponsored project (salary cost share or match).

### B. Effort Report (“ER”)

The report must account for all activities for which the University compensates the individual and that are required in fulfillment of the employee’s obligations to MSU. The total of the individual effort percentages reported on the effort report must equal 100 percent regardless of the number of hours worked. An individual’s effort cannot exceed 100 percent.

### C. Estimating Effort

According to 2 CFR 200, “[i]t is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to Federal awards for [institutions of higher education], a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected.”

MSU’s tolerance threshold is less than 5 percentage points on any given project. If a reasonable estimate of actual effort is within 5 percentage points of the effort shown on the report, it is permissible to certify the level of effort that appears on the report.

### D. Schedule for Distribution and Certification of Reports

1. The ERs for exempt (“salaried”) employees will be distributed three times a year by the business office, for the periods of September-December (fall semester), January-May (spring semester), and June-August (summer semesters).
2. The semimonthly time sheets completed by non-exempt (“hourly”) employees will serve as documentation of those individuals’ effort.

### E. Required Procedure for Exempt Employees Paid from a Sponsored Program



**Account:**

1. The Grants Accountant will run an extract process within ten (10) business days of the end of a reporting period to populate the Effort Certification Reports.
2. Within ten (10) business days of the action in Subsection E.1 above, the Grants Accountant will send an email notification to all individuals required to complete an effort report to provide a timeline and instructions for completion of effort reports.
3. The employee, principal investigator (“PI”), or responsible official(s) having direct knowledge or other suitable means of verification that the work was performed will certify the report within thirty (30) days of receiving the email notification indicated in Subsection E.2 above.
4. If an individual’s effort on any sponsored project is 5 or more percentage points *less than* the salary charged to the sponsored project fund, the individual must email the Office of Sponsored Programs and Research and Grants Accountant at least ten (10) business days before the end of the effort reporting period to report the difference and request a redistribution of labor charges where applicable.
5. The individual will obtain supervisor signatures and return the forms to the Grants Accountant. The Grants Accountant will review the reports to verify effort commitments and prevent unauthorized changes to the distribution of funds.

**F. Required Procedure for Individuals Who Contribute Time to a Sponsored Project as a Committed Cost Share or Match:**

1. The Grants Accountant will work with the originating department and to request the setup of companion cost sharing account(s), which will be established by the Business Office. The Grants Accountant will submit a request to the Budget Office to transfer the required matching funds into the companion cost sharing account(s).
2. The employee(s) providing cost sharing through committed time will follow the procedures for reporting effort outlined in Section E above.
3. The PI will review the reports to verify cost sharing commitments have been met.

**G. Non-exempt (“hourly”) staff and student workers will complete their regular monthly or semi-monthly time sheets (paper or electronic), and these documents will serve to certify their effort during each pay period.****H. Training:**

All PIs, co-PIs, and senior/key personnel must attend training either in-person or in an online environment, on effort reporting and certification. These individuals must

complete the training within 30 days of execution of a new sponsored project award. The Office of Sponsored Programs and Research is responsible for maintaining records from these training sessions.

Student employees need not attend training, but financial managers are responsible for ensuring the student(s) working on sponsored projects are aware of the requirement for accurate and timely completion of their time sheets. In particular, financial managers must ensure the students' charges are reasonable, necessary, and allocable to the project.

Once PIs, co-PIs, and senior/key personnel have attended the introductory training, they must complete follow-up training once every four years or when the policy undergoes a major revision, whichever comes first.

#### **I. Consequences for non-compliance**

After 60 days of the reporting period, the Business Office will provide the Provost and Vice President for Academic Affairs and the Vice President for Administration and Finance a list of faculty and staff who are not in compliance with training and certification requirements. If it is determined that an individual is not in compliance with training and certification requirements, the following actions may be taken:

1. Sponsored project services will be withdrawn and not provided by the institution including, but not limited to, the submission of new proposals, the execution of award agreements, and general administrative services.
2. The Business office will deactivate current sponsored project funds.
3. Further disciplinary action may be taken in accordance with University policy.

#### **J. Labor Redistributions**

1. If the total effort in a given performance period is 5 or more percentage points less than the salary charged to the sponsored project fund, the individuals certifying their effort must inform the Office of Sponsored Programs and Research and Grants Accountant at least 10 days before the end of the reporting period.
2. The Grants Accountant is responsible for notifying the principal investigator/project director and the Payroll Office of the need for a redistribution of labor costs for the period within 10 business days of receiving notice from the individual requesting a redistribution. The principal investigator/project director and/or his/her supervisor are responsible for identifying the funding source(s) that will cover the cost of the redistribution and notifying the Budget Office thereof.
3. The Payroll Office will redistribute the individual's labor according to percentage of actual work performed within 30 days of receiving notice from the Grants Accountant. The Payroll Office will notify the Grants Accountant that redistributions have been made within 5 business days of completing the

redistributions.

4. The Grants Accountant will notify the Office of Sponsored Programs and Research and the individuals with labor redistributions that the requested changes have been made and completed, and the individuals will be responsible for completing their certifications as instructed in Section E above of this policy.

## **VI. Related Statutes, Rules, Policies, Forms, and Websites**

Related Statutes/Rules:

[Title 2, Code of Federal Regulations, Part 200, Section 430](#)

Related MSU Policies:

Related Websites:

## **VII. Responsible Offices**

Contacts:

Provost and Vice President for Academic Affairs

(940) 397-4226

[margaret.brownmarsden@msutexas.edu](mailto:margaret.brownmarsden@msutexas.edu)

Vice President for Administration and Finance

(940) 397-4117

[chris.stovall@msutexas.edu](mailto:chris.stovall@msutexas.edu)

## **VIII. Revision History**

     /      /2025: Adopted and approved as Operating Policy and Procedure (“OP”) 56.09:  
Effort Reporting and Certification by MSU President Stacia Haynie.

---

Stacia Haynie, President  
Midwestern State University

Date Signed: \_\_\_\_\_