Time and Effort

This document establishes the procedural requirements for preparing and reporting employee time worked on grant activity. These procedures apply to all grants awarded to South Texas College. The purpose of this document is to outline the standards for reporting time and effort at South Texas College (STC).

It is required for all grants that the Project Director (PD) / Principal Investigator (PI) maintain effort documentation, such as schedules, logs, sign-in sheets, etc. as evidence of grant activity performed by the employee.

1. Why are Time and Effort Requirements Important?

Time and Effort is important to ensure that South Texas College is compliant with regulations outlined in the Education Department General Administrative Regulations (EDGAR), particularly with 2 CFR Part 200.430 related to time and effort documentation. EDGAR requires time distribution **documentation** to ensure that charges to each Federal program reflect an **accurate account** of the employee's time and effort devoted to that program. It is also important to implement Time and Effort documentation requirements consistently regardless of the source of funds to ensure that the institution and the grant is charged in accordance to the benefit received.

2 CFR 200.430 Compensation – personal services, (i.) Standards for Documentation of Personnel Expenses (what we refer to as Time and Effort) states that "(1) Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed.

These records must:

- (i) <u>Be supported by a system of internal control</u> which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- (ii) Be incorporated into the official records of the non-Federal entity;
- (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities;
- (iv) Encompass both federally assisted and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy;
- (v) Comply with the established accounting policies and practices of the non-Federal entity"

2. What is Time and Effort?

Time and Effort is defined as the amount of time spent on a particular activity. It includes the time spent working on a sponsored project in which salary is directly charged to a grant or contributed (cost-shared effort) to a grant.



Effort reporting is the mandated method of certifying to the granting agencies that the percent of payroll charged or *cost-shared* (match or in-kind) to each award reasonably reflects the actual work completed on the project by each individual.

Factors Affecting Allowability 200.430

All Costs Must Be:

- 1. Necessary, Reasonable and Allocable
- 2. Conform with federal law & grant terms
- 3. Consistent with state and local policies
- 4. Consistently treated
- 5. In accordance with GAAP
- 6. Not included as match
- 7. Net of applicable credits (200.406)
- 8. Adequately documented

EXAMPLE: You have a grant from the National Science Foundation to study changing climate patterns. The project includes participating in a conference in Seattle. You have been invited to present a paper at this conference. There are no prohibitions against travel on the grant, so the travel costs are ALLOWABLE.

At the conference, you take a taxi to the venue and pay a 15% tip. The cost of the tip is a UNALLOWABLE cost (as tips are never allowable through grants, as identified federal regulations), and that part of the taxi bill may NOT be charged to the grant. STC can reimburse for this portion of the expense, but the money must come from non-sponsored funds.

Necessary, Reasonable and Allocable Costs?

Necessary and reasonable cost consideration must be given to whether the cost is a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.

Necessary

The item purchased is necessary to carry out the objectives and goals of the project.

EXAMPLE: an investigator purchases lab supplies that are NECESSARY to perform experiments related to the project. The supplies are NECESSARY for the performance of the project as the experiments cannot happen without the supplies. They may be charged to the project as direct costs.

Reasonableness

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a *prudent person* under the circumstances prevailing at the time the decision was made to incur the cost.



EXAMPLE: Your grant allows for the purchase of standard laptop computers for student use. You submit a requisition for laptop computers that cost \$10,000 each. Is that a reasonable price? If they are standard computers, then no it is NOT a reasonable price (would you personally pay \$10,000 for a computer)? If the computer is for a specialized purpose, include documentation from a reputable source or an approved vendor, stating that it is the approximate cost of the items.

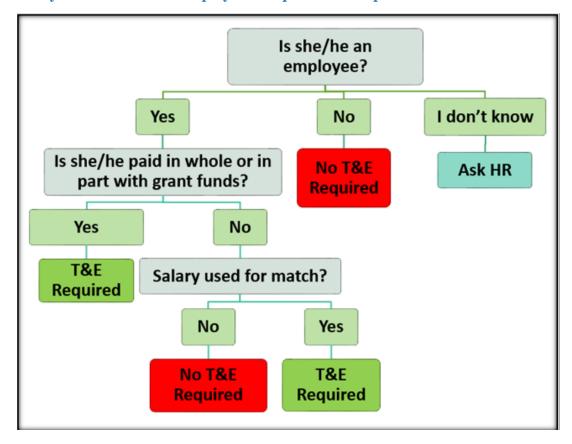
Allocability

A cost is allocable to an award or another cost objective if the goods or services involved are chargeable or assignable to that award or cost objective in accordance with relative benefits received.

EXAMPLE: The conference you are speaking at focuses on the *El Nino* effect on the global climate. You will present and interact with colleagues from other academic institutions. The trip will benefit the project, and the travel costs are therefore ALLOCABLE to the project.

Without some documentation, STC or an external auditor might question the *ALLOCABILITY* of this expense to your project. In a case like this, when the department submits expense reports for reimbursement, the package should include the conference agenda or other documentation to support the relationship between the travel and the project which paid for it.

3. How do you know when an employee is required to complete Time and Effort records?





South Texas College Time and Effort Forms

Forms for Time and Effort Reporting are available on the Grant Development, Management and Compliance (GDMC) webpage at https://admin.southtexascollege.edu/grants/forms.html

Time and Effort Selection Process

Steps to follow and forms to use upon selecting between the 3 options that pertain to the situation for the employee doing grant activity. The options are:

- **OPTION 1:** Employee does Grant Activity *In Addition* to STC salary
- **OPTION 2:** Employee works 100% of their work time on Grant Activity
- **OPTION 3:** Employee is released by department to complete grant activity



OPTION 1: Employee does Grant Activity In Addition to STC Salary

Forms Required during the Process:

- * GDMC-005, Commitment
- * NOE (Notice of Employment)
- * GDMC-007, Personnel Certification

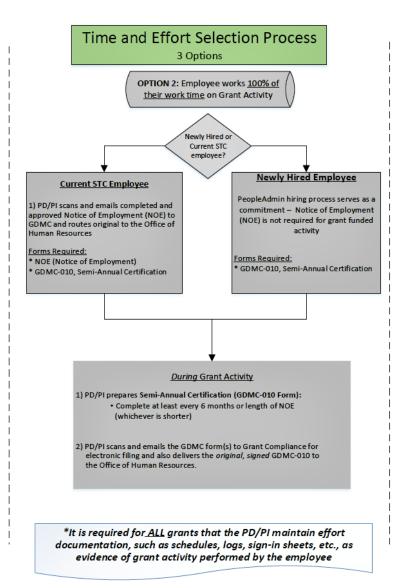
Before Grant Activity

- 1) Project Director (PD)/Principal Investigator (PI) completes Grant Activity Commitment (GDMC-005 Form) and Notice of Employment (NOE)
- 2) PD/PI scans and emails completed GDMC-005 Form and NOE with support documentation (description of duties, MOU or other grant documents) as justification for GDMC Compliance staff to verify information
- 3) GDMC Compliance staff member conducts verification of GDMC-005 Form and NOE
- 4) Once verified as complete, accurate, allowable, allocable to the grant, GDMC Compliance staff member prints, signs, scans and emails the GDMC-005 and NOE to the PD/PI to print, sign and route for signatures of approval
- 5) Once all approvals are obtained, PD/PI scans and emails a copy of the signed GDMC-005, NOE and supporting documents as a packet to GDMC and routes original packet to HR

Upon Completion of Grant Activity

- 6) PD/PI prepares Personnel Certification (GDMC-007 Form): · Complete at least every 6 months or length of NOE
 - (whichever is shorter)
- 7) PD/PI gathers any support documentation needed for verification of grant activity completed.
- 8) PD/PI delivers the original, signed GDMC-007 for GDMC verification and routing to Human Resources to process for

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department to complete grant activity Forms Required during the Process:

* GDMC-008, Personnel Activity Report (PAR)

OPTION 3: Employee is released by

Before Grant Activity

Project Director (PD)/Principal Investigator (PI) discusses with employee information needed on the GDMC-008: Personnel Activity Report (PAR) monthly

- Employee prepares form monthly
- · Daily activities for grant MUST be listed
- Total working hours (STC + all grants) are calculated
- Employee signs, Supervisor & PD/PI approves and original is sent to PI

During Grant Activity

- 1) Employee prepares Personnel Activity Report GDM C-008 (PAR) and submits original to Supervisor and PD/PI for approval of grant activity on a monthly basis
- 2) For reclassification of funds back to department: PD/PI scans and emails original, signed form to the Department of Grant Development, Management & Compliance and routes to original form directly to the Business Office-Grants by 5th of the following
- B)For In-Kind/Match support: PD/PI delivers original, signed form to the Department of Grant Development, Management & Compliance for electronic filing and then GDMC routes to original form to the Business Office-Grants.
- 4) Based on the approved PAR. Grant Accounting will reclassify grant hours from department to the grant account.

**All grant funded personnel AND personnel included to meet a match requirement must adhere to the documentation requirements for effort reporting.



Option 1 - Most Common

Employee receives grant stipend in addition to normal salary

Before Grant Activity:

- 1. PD/PI completes Checkbox, Sections 1, 2 and 3 (if applicable) of **Grant Activity Commitment Form (GDMC-005)** and **Notice of Employment (NOE)**
- 2. PD/PI scans and emails completed form and NOE with justification to GDMC
- 3. GDMC conducts verification
- 4. Upon verification, form is sent back to PD/PI to route for signatures
- 5. Once approved with signatures, PD/PI submits packet (form, NOE, and grant document that justifies grant activity to HR (HR provides eligibility review prior to employee starting grant activity)



G	RANT ACTIVITY COM	MMITMENT FO	RM
Section 1 Employee and Grant I	nformation Date: Date Initiated b	y Principal Investigator (PI)	Checkbox Selection
This form is a commitment for	Employee Name to complete g	rant activity In	structions: Check ONLY ONE box
as described in Section 2 of this form	from Activity Start Date to be complet		100% of time is obligated to grant (Sections 1 & 2)
	aplete grant funded activity for	Grant Name	Grant Match Requirements
funded by the Funder or Grantor A			(Sections 1 & 2 only)
Section 2 Grant Activity and Requ		I	Grant duties in addition to
Description of Grant Funded Activity grant funded work by the end date sp grant funded activity:			regular position. (Sections 1, 2 & 3)
grant funded activity.	Grant Activ	vity #1	
	Grant Activ	rity #2	
	Grant Activ	ity #3	
	Grant Activ	ity #4	
for the retention period provide college, grantor, or internal/en *If the employee is unable to Director of Grant Developme. Section 3 Employee Commitment (I, Employee Name, com I understand that compensation assignment and submission of the state of the employee completes the initials from approvers.	ence of work completed such as, signible files with documentation evidentled by the grantor. The PD/PI must external auditor. In this agreement, the employee MU and Complete ONLY if Box C above, is sumit to complete activities as described in the amount of Stipend Arche approved Personnel Certification of the approved Personnel Certification of the Archivity early, the Notice of the dupon the South Texas College and the south Texas College.	n-in sheets, work products, ce provided by the employ ensure accessibility of document accessible and prior to the accessibility of document accessibility accessibility of document accessibility accessibili	logs, etc. we performing grant activity amentation if requested by the whe PD/PI of the grant, and the we End Date of grant activity. Tend Date cessed upon completion of the d date requires revision with
Section 4 Grant Compliance Verifica	tion		
Verifie	d By	GDM	C Sign & Date
Section 5 Employee Commitment		OD III	e bigh & built
Employee	e Name		
Employee's	Department	Emplo	yee Sign & Date
Section 6 Approvals for Employee to C	Complete Grant Funded Activity		
Supervisor of Record (In H.R. Jo	b Description) Name and Title	α	Ci P D-t-
Supervisor's D	epartment	Supervis	sor Sign & Date
Principal Investigat	or Name and Title	DD /D	I Siam & Data
PD/PI's De	partment	PD/PI	I Sign & Date
Financial Manager of Gra	nt Work Name and Title	C 5	M. Sion & Data
Grant FM's D	epartment	Grant F	M Sign & Date
Form: GDMC-005	Grant Development, Managem 06/26//2019	ent and Compliance	



After Grant Activity:

- 1. PD/PI prepares **Personnel Certification (GDMC-007 Form)-***To be completed at least every 6 months of length of NOE, whichever is shorter.*
- 2. PD/PI gathers any supporting documentation of grant activity that was completed (sign-in sheets, logs, schedules, etc.)
- **3.** PD/PI delivers the original, signed form for GDMC verification and routing to HR to process for compensation.



PERSONNEL CERTIFICATION

This form must be submitted within 5 days of completion of the assignment or the $\it End \, Date \, of \, grant \, activity, \, whichever \, comes \, first.$

Section 1 Employee and Grant Activity Information

This is to certify that	Employee Name	has completed grant activity for the
Name of 0	Grant	which was completed within the following timeframe:
Start Date to	End Date	
*If the timeframe for gran completed.	t activity is longer than	six months, a new Personnel Certification form must be
Responsibilities and Commits assurance that grant work has provides reasonable assurance	ment Form (GDMC-005) It been completed by the eme that charges to the grant that charges are allowable and a	rant activity performed and as described on the approved Grant Activity has been completed. The supervisor's signature provides reasonable aployee. The signature of the Project Director or Principal Investigator to compensate the employee are based on records that accurately reflect allocable to the grant. The signee understands that any false information tion or other penalties.
Section 2 Employee Certi	fication	
Employee	Name	Employee Sign & Date
Section 3 Approval by Proj	ect Director or Principal	Investigator of Grant*
Name of I	PD/PI	DD/DI Cou. f. Data
		PD/PI Sign & Date
Section 4 Approval by Em	ployee's Supervisor	
Supervisor's	Name	
		Supervisor Sign & Date
Section 5 Verification of Doo	cumentation Evidence of	Grant Activity by Grant Compliance*
Verified By (GDMC	C Staff Name)	
		GDMC Sign & Date
This document is to be signed/da	ated and approved <i>after</i> the gr	rant activity End Date or completion of the work, whichever comes first.
Compensation is processed based End Date.	d on the South Texas College	Payroll Calendar, after the 15th of the month following the grant work
*It is the responsibility of the Pl period required by the grantor.	D/PI to maintain documenta	tion evidence of grant work performed by the employee for the retention

Uniform Grant Guidance: Title 2, Subtitle A, Chapter II, §200.430 Grant Development, Management and Compliance 06/26/2019

SOUTH TEXAS COLLEGE

Form: GDMC-007

What is a Cost Objective?

A cost objective is a program, function, activity, award, organizational subdivision, contract, or work unit for which cost data are desired and for which provision is made to accumulate and measure the cost of processes, products, jobs, capitals projects, etc.

Multiple cost objectives can be when there is more than one federal award; a federal and non-federal award; an indirect cost activity and a direct cost activity; or an unallowable activity and an allowable activity.

Option 2 - A Single Cost Objective

STC employee works 100% of their work time on grant activity

Before Grant Activity:

For existing or immediate hire employee works 100% of their time on grant activity

- 1. PD/PI scans and emails completed and approved **Notice of Employment (NOE)** to GDMC and routes original to HR
- 2. PD/PI prepares **Semi-annual Certification (GDMC-010 Form)**, scans and sends to GDMC
 - a. To be completed at least every six months or length of NOE (whichever is shorter)

OR

For <u>newly hired</u> employee works 100% of their time on grant activity (<u>People Admin</u> hiring process serves as a commitment – *neither GDMC-005*, 007, nor NOE are required)

- 1. PD/PI prepares **Semi-annual Certification (GDMC-010 Form)**, scans and sends to GDMC
 - a. To be completed at least every six months or length of NOE (whichever is shorter)



SEMI-ANNUAL CERTIFICATION

For use only for positions 100% funded to work on a single cost objective. A single cost objective can be a function, organizational subdivision, contract, grant or other activity for which cost data is needed and for which costs are incurred. Source: The Administrator's Handbook on EDGAR, 3rd ed., (2015). Washington, D.C.: Brustein and Manasevit, PLLC

Section 1 Employee and Grant Activity Information

his is to certify that	Employee Name	has spent 100% of their time on grant activity for the
Name	of Grant whi	ch was completed within the following timeframe:
Start Date	to End Date	
ection 2 Employee C	ertification (Signature #1)	
	NI	
Employ	ee Name	Employee Sign & Date
Approvals that Emplo	yee Completed Grant Funded	Activity
ection 3 Approval by I	Project Director or Principal In	vestigator of Grant* (Signature #2)
Namo	e of PD/PI	
		PD/PI Sign & Date
ection 4 Approval b	y Employee's Supervisor (Signa	ature #3)
Supervi	isor's Name	
o apo. v.		Supervisor Sign & Date
In the case of the Carl Per	kins grant which crosses over multiple I	Divisions & Departments, it is the responsibility of each individual department to

Uniform Grant Guidance: Title 2, Subtitle A, Chapter II, §200.430 Grant Development, Management and Compliance 06/26/2019



Form: GDMC-010

Option 3 - Uncommon

Employee is <u>released</u> by department to complete grant activity

Before Grant Activity:

PD/PI discusses the requirements of **Personnel Activity Report (PAR) (GDMC-008)** with employee contributing to grant effort

- Employee prepares form monthly
- Daily activities for grant MUST be listed
- Total working hours (STC + all grants) are calculated
- Employee signs, Supervisor & PD/PI approves and original is sent to PI

During Grant Activity:

- 1. Employee prepares PAR (GDMC-008) on a monthly basis and submits to supervisor and PD/PI for approval
 - a. *PAR needs to include daily activities for grant and total hours (including non-grant activity)
- 2. PD/PI scans and emails to GDMC and sends original signed form to Grant Accounting by the 5th of the following month
- 3. Based on approved PAR, Grant Accounting will reclassify grant hours from department to the grant.



Employ	Personnel Activity Repo ee Name:	Month:			
	nent:	Year:			
	nent/Position:				
Date	Description of Grant Activity	"Grant Name" Hours	"Grant Name" Hours	STC Hours Hours	Total Hours
1					0
2					0
3					0
4					0
5					0
7					0
8					0
9					0
10					0
11					0
12					0
13					0
14					0
15					0
16 17					0
18					0
19					0
20					0
21					0
22					0
23					0
24 25					0
26					0
27					0
28					0
29					0
30					0
31					0
	Total Grant Hours		0	0	0
	Total Percentages for Grant/Non-Grant Activity (Only for split funded/work)	#DIV/0!		#DIV/0!	#DIV/0!
that any *By sign perform Employ		penalties. t is complete	and accurate	ely reflects wo	
	and Title:				
Signatu	re : Director (PD)/Principal Investigator (PI)			Date:	
	and Title:				
Signatu	re:			Date:	
	ee's Supervisor and Title:				
Signatu	re:			Date:	
Manager of the me	unds will be expended to cover employee salary/benefits, scan PAR ment & Compliance and send this original, signed form to the Busin only indicated at the top of the form. For documention of in-kind/m Development, Management & Compliance to electronically file and s.	ess Office - Gra atch for effort r	ents & Contract reported, send	s within 5 days original to the	s of the end Department
	Uniform Grant Guidance: Title 2, Subtitle A,	Chanter II COOO 41	20		



Cost Sharing, Match and In-kind Requirement

Cost-sharing represents that portion of the total project costs of a sponsored agreement that are not borne by the sponsor/grantor of the project. These costs are borne by the College or another non-federal third party. Cost-sharing represents a redirection of departmental resources to contribute toward the value of the grant. Some grants have Match requirements, which require the grantee to contribute a portion of funding toward the project. If the cost-sharing or match includes personnel costs, then Time and Effort reporting documentation requirements also apply. Some grants have in-kind requirements, this is the value of time and effort or other allowable expenditures that contribute to a grant. If the in-kind contribution includes personnel time and effort, Time and Effort reporting documentation requirements apply to salaries counted as in-kind.

2 CFR 200.430 (i) Standards for Documentation of Personnel Expenses Section 4 states that, "Salaries and wages of employees used in meeting cost sharing or matching requirements on Federal awards must be supported in the same manner as salaries and wages claimed for reimbursement from Federal awards." To comply with this federal code, South Texas College's Department of Grant Development, Management, and Compliance provides processes, forms, and training that address the requirements for cost-sharing, matching or in-kind contribution in relation to personnel salary and wages. This is to support the departments across the college to comply with the federal requirements on all grants.

4. System of Internal Controls

Under the Uniform Grant Guidelines, internal controls are important for an organization to have documented and on file.

What are Internal Controls?

CFR 200.61 Internal controls state that "Internal Controls means a process, implemented by a non-federal entity, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- (a) Effectiveness and efficiency of operations;
- (b) Reliability of reporting for internal and external use; and
- (c) Compliance with applicable laws and regulations."

Internal Control is a process, enacted by South Texas College's Board of Trustees, management and other personnel, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- Operations relating to effective and efficient use of South Texas College's resources
- **Financial reporting -** relating to the preparation of reliable published financial statements
- Compliance relating to South Texas College's compliance with applicable laws and regulations



Internal controls consist of the following five interrelated components:

- 1. Control environment
- 2. Risk assessment
- 3. Control activities
- 4. Information and communication
- 5. Monitoring

Source: https://admin.southtexascollege.edu/audits/internal-controls.html

Note: The definition of internal control and related concepts have been taken directly from the (2013) Internal Control-Integrated Framework Principals by the Internal Control Committee of Sponsoring Organizations of the Treadway Commission (COSO), retrieved from: https://www.coso.org/Documents/COSO-ICIF-11x17-Cube-Graphic.pdf

To comply with **2 CFR 200.430** (i) Standards for Documentation of Personnel Expenses, South Texas College's Department of Grant Development, Management, and Compliance provide post-award technical assistance to Project Directors or Principal Investigators and Financial Managers of Grants. For grants that require employees to complete Time and Effort documentation, post-award technical assistance includes guidance and reminders for the timely completion of Time and Effort documentation forms. Grant and Contracts Compliance staff also conduct verifications of Time and Effort forms (GDMC-005 and GDMC-007) prior to submission to the Department of Human Resources. This action is a procedure to help ensure that Time and Effort documentation requirements are carried out and that risk of non-compliance is minimized (see COSO, 3. Control Activities).

Grant and Contracts Compliance staff complete a Verification Checklist to verify the completion, accuracy, allowability, and allowability to the grant for which the Grant Activity Responsibilities and Commitment Form – GDMC 005 has been completed by the Project Director or Principal Investigator assigned to the grant. At the completion of the employee's grant activity described on that form, Grant and Contracts Compliance staff follow-up to remind Project Directors and Principal Investigators to submit the Certification Form – GDMC 007 in a timely manner. A Verification Checklist is completed by the Grant and Contracts staff member to verify the completion of Form – GDMC 007 and to verify that the grant Project Director or Principal Investigator assigned to the grant has documentation on file as evidence of grant activity completed by the employee. This verification occurs prior to routing the form for approval signatures and prior to submission to the Department of Human Resources to process compensation for grant activity performed by an employee.



Verification Forms

Verification Form (Internal Control for GDMC) for GDM-005 Grant Activity Commitment.

Purpose: Verification of the following information:

- Document properly filled out and dates match to NOE
- Approval signatures captured
- Verification of activity to be completed
- Justification of allowability of such activity in grant (for example listed in the contract, agreement or budget)

Verification Checklist		ber completes this checklist to verify the completion, ility to the grant for which the Grant Activity Form - GDMC-005 has been completed.
Verified by: Date: Grant Name: Funding Agency		Comments
Verification Checklist	Place a checkmark in the row for each item verified	
Section 1. All names, grant name, funding agency and dates on form are complete and typed or printed legibly		
Checkbox Selection. The correct box is checked.	П	
Section 2. Description of Grant Funded Activity includes activity that is allocable to the grant named on the form.		
Section 3. Compensation Information is complete only if Box C is checked in the Checkbox Selection.		
Section 3. Compensation Information includes a stipend amount that has been verified as calculated based on the LHE Rate (faculty) or Hourly Rate (staff).		
Section 3. Compensation Information. The cost of compensation for the work performed by the employee is allocable (chargeable or assignable) to the grant per grant guidelines.		
Section 3. Compensation Information. The charges to the grant for work to be performed is an allowable cost to the grant.		
The Grant Activity Responsibilities and Commitment Form approved by the Employee, Supervisor, Project Director or Manager of the grant after Grant Compliance has verified to	Principal Investigator, and the Financial	



Verification Form (Internal Control for GDMC) for GDMC-007 Personnel Certification.

Purpose: Verification of the following information:

- Document properly filled out and dates match to GDMC-005 and NOE
- Approval signatures captured
- Verification of activity listed in GDMC-005 Grant Activity Commitment form has been completed

	ate:		Comments	
Grant Name:Funding Agency Employee Doing Grant Work:				
Verification Checklist	1.	llace a checkmark in the row for ach item verified		
Section 1. Name of employee, name of goon form are complete and typed or printed				
Section 2. Name, signature and date of E certifying completion of grant activity are				
Section 3. Name, signature and date of P (PD) or Principal Investigator (PI) are con				
Section 4. Name, signature and date of E Supervisor is completed.	imployee's			
Section 5. Upon completion of Verification Sections 1-4, enter name of Grant Comp member completing GDMC Form 007, sig	liance staff			
Compensation is processed based on the *It is the responsibility of the Project Direct the retention period required by the grant	e Human Resource D ctor (PD)/Principal In or.	Department Payroll Schedule, after the vestigator (PI) to maintain documentat	completion of the work, whichever comes first. 15th of the month following the grant work End ion evidence of grant work performed by the en tain support documentation, not the PI/PD.	

The Department of Grant Development, Management and Compliance provides training annually on Time and Effort to provide guidance regarding the compliance with regulations in EDGAR and to train administrators, faculty and staff who work with grants in the completion of required Time and Effort Documentation.

