

Category: 7000 PERSONNEL	Policy Number: 7317
Policy Title: Time and Effort Reporting Requirements	Effective Date: December 20, 2017

PURPOSE

This policy and its accompanying procedure establish school district requirements and guidelines for time and effort reporting and management of effort commitments for all federally-funded programs/projects.

Federal requirements provide that salaries and benefits charged to a federal award(s) must be based on appropriate documentation. All employees who are paid in full or in part with federal funds must keep specific documents to demonstrate the amount of time they spent on grant activities. Covered employees include staff working at the District level, such as program directors, central-level administrators, and business officials, as well as staff working at the school level, such as classroom teachers. This also includes an employee whose salary is paid with state or local funds but is used to meet a required “match” in a federal program. Effort reporting is a required process by the federal government to verify that direct charges for salaries and benefits to federally sponsored programs are reasonable and reflect actual work performed. This requirement applies to all federal awards and sub-awards, including those received directly from the federal government, unless specifically exempted by the Office of Management and Budget (OMB). Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- Be supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable and properly allocated;
- Be incorporated into official records;
- Reasonably reflect total activity for which the employee is compensated, not exceeding 100% of compensated activities;
- Encompass both federally assisted and all other activities compensated by the district on an integrated basis;
- Comply with the established accounting policies and practices of the district; and
- Support the distribution of the employee’s salary or wages among specific activities or costs objectives.

TIME AND EFFORT REPORTING REQUIREMENTS

Where employees are expected to work solely on a single federal award or cost objective, charges for their salaries and wages must be supported by semi-annual certifications that the employees worked solely on that program for the period covered by the certification. These semi-annual certifications must be signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee.

Where employees work on multiple activities or cost objectives, a distribution of their salaries or wages must be supported by personnel activity reports or equivalent documentation unless a statistical sampling system or other substitute system has been approved by the federal agency granting the funds.

Failure to verify time and effort within the certification period or improper allocation of employee’s time according to contractual agreement can lead to breach of contractual agreement, loss of future awards, and adverse public image. Criminal charges may be brought against an individual who certifies a falsified report (Federal False Claims Act).

The district’s time and effort reporting procedure is set forth in Policy 7317P1 and in form 7317F1.



LEGAL REFERENCE:

Education Department General Administrative Regulations (EDGAR), 2 CFR 200 *et seq.*

ADOPTED: 06/18/2014

AMENDED: 12/20/2017

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TIME AND EFFORT REPORTING PROCEDURES

Semi-Annual Certification

Where employees are expected to work solely on a single federal award or cost objective, charges for their salaries and wages must be supported by semi-annual certifications that the employees worked solely on that program for the period covered by the certification. These semi-annual certifications must be signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee and should reference the employee's signed and dated job description maintained in their personnel file. Charges to the grant must be supported by these semi-annual certifications. The semi-annual certifications are maintained by the federal programs director of the District.

Employees working on a single cost objective are required to maintain on file a signed and dated job description which clearly shows that the employee is assigned 100% to the program or single cost objective. The job description must be updated annually and when a function or activity is added to or deleted from an existing job description, must clearly identify the function and activities performed by the employee for the applicable fund source(s) or cost objective, and must be maintained in the employee's personnel file.

The semi-annual certification must:

- Be executed after the work has been completed; not before;
- State that the employee worked solely (i.e. 100% of the time) on activities related to one particular grant program or single cost objective;
- Identify the grant program or cost objective;
- Specify the 6-month reporting period; and
- Be signed by the employee and/or a supervisor with first-hand knowledge of the work performed.

Personnel Activity Reports (PAR)

Where employees work on multiple activities or cost objectives, a distribution of their salaries or wages must be supported by personnel activity reports or equivalent documentation unless a statistical sampling system or other substitute system has been approved by the federal agency granting the funds. Such documentary support is required where employees work on:

- More than one federal award,
- A federal award and a non-federal award,
- An indirect cost activity and a direct cost activity
- Two or more indirect activities which are allocated using different allocation bases, or
- An unallowable activity and a direct or indirect cost activity.

Personnel activity reports (PAR) or equivalent documentation must meet the following standards:

- Reflect an after-the-fact distribution of the actual activity of each employee,
- Account for the total activity for which each employee is compensated,
- Be prepared at least monthly and must coincide with one or more pay periods, and
- Be signed by the employee.

Substitute System

Only eligible employees participate in a substitute system. To qualify for this substitute system in lieu of traditional PARs, the employee must work on multiple activities or cost objectives (i.e. more than one federal grant award) based on a predetermined, set schedule. Most likely it is applicable to classroom teachers or instructional aides. The certification is signed by the employee or by the supervisor having first-hand knowledge. Documented employee work schedules will include sufficient controls to ensure that the schedules are accurate.

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To be eligible to document time and effort under the substitute system, employees must:

1. Currently work on a schedule that includes multiple activities;
2. Work on specific activities or cost objectives based on a predetermined schedule; and
3. Not work on multiple activities or cost objectives at the exact same time on their schedule.

Employee schedules must:

- Indicate the specific activity or cost objective;
- Account for the total hours; and
- Be certified at least semi-annually and signed by the employee or a supervisor.

Additionally, any significant revisions to an employee's established schedule must be documented and the effective date of any changes must be clearly indicated on the documentation provided.

Before the District implements a substitute system, it will submit a management certification form to the State Department of Education (SDE).

Reconciliation and Closeout Procedures

Budget estimates or other distribution percentages determined before the services are performed do not qualify as support for charges to federal awards but may be used for interim accounting purposes, provided that the following is met:

- The system utilized for establishing the estimate produces reasonable approximations of the activity actually performed;
- At least quarterly, comparisons of actual costs to budgeted distributions based on the monthly activity reports are made. Costs charged to federal awards to reflect adjustments made as a result of the activity actually performed may be recorded annually if the quarterly comparisons show the differences between budgeted and actual costs are less than ten percent (10%); and
- The budget estimates or other distribution percentages are revised at least quarterly, if necessary, to reflect changed circumstances.

In all cases, the District's accounting records will be adjusted to reflect actual time and effort records. The business manager is responsible for conducting the reconciliations described above.

Time and effort documentation must be maintained for stipends, supplemental contracts, and/or extra duty hours. Such documentation may include:

- Sign-in/attendance logs for extra hour pay related to a single cost objective.
- A signed supplemental contract that stipulates a specific single cost objective duty/assignment.
- A stipend for performing a specific single cost objective responsibility, so long as the employee signs either the stipend or an after-the-fact certification of performance.
- Multiple cost objective supplemental contracts/stipends must be supported by time and effort reports documenting actual time spent on each objective.

Time and effort documentation is incorporated into the records of the District and retained in accordance with federal regulations set forth in the Education Department General Administrative Regulations (EDGAR), 2 CFR Part 200 *et seq.* and/or the District's records retention schedule.

For an employee that is separating his/her services with the District, the employee will complete the required paperwork and submit his/her final certification or PAR to the federal programs director. The business manager will verify the final paperwork as complete prior to issuance of the final paycheck.

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DEFINITIONS

Documentation

Timesheets and any other documentation that supports the transaction.

Effort

Actual amount of time spent by an employee on a sponsored project. Effort is expressed as a percentage of the total amount of time spent on work-related activities for which the employee is compensated. It is not defined as percentage of a 40-hour workweek or any other standard workweek since the number of hours each week may vary. All effort must equal 100%.

Effort Reporting

The method of certifying to the granting agencies that the effort required as a condition of the award has actually been completed and that salaries and wages charged to each sponsored agreement are reasonable in relation to the actual work performed.

Personnel Activity Reports (PAR) or Equivalent Documentation

Documentation that meets specific federal standards set forth in the Education Department General Administrative Guidance (EDGAR), 2 CFR Part 200 *et seq.*

Sponsored Program/Project

An externally-funded activity that is separately budgeted and accounted for and governed by specific terms and conditions of the sponsoring organization. A sponsored program may be in the form of grants, contracts, or cooperative agreements for research, instruction, and public service activities.

Single Cost Objective

A “cost objective” means 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, capital projects, etc. A cost objective may be a major function of the District, a particular service or product, a federal award, or an indirect cost activity. Single cost objectives include a single federal grant award or a combination of federal special education and state special education program funds.



LEGAL REFERENCE:

Education Department General Administrative Regulations (EDGAR), 2 CFR Part 200 *et seq.*

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Policy Title: Semi-Annual Certification/ Personal Activity Report (PAR) Form	Effective Date: December 20, 2017
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Type of Certification (Semi-Annual)

- Semi-Annual** (*single cost objective 100%*)
- Personal Activity Report (PAR)** (*multiple cost objectives*)
- Substitute System** (*multiple cost objectives with predetermined, set schedule*)

Type of Schedule:

- Daily
- Weekly
- Biweekly
- Other: _____

Employee: _____

Position: _____

Reporting Period: _____

Cost Objective (Program Activity)	Fund Code-Program Function Code	Program	Distribution of Time (Percentage of Hours)

Employee's Signature _____ Date _____

I hereby certify this report is an accurate representation of the total activity expended during the period indicated.

Reviewed by supervisor: _____ Date: _____