

Federal Grants – Time & Effort Reporting

Special Education Team
WI Department of Public Instruction

5/12/2010

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What is time and effort reporting?

- Must demonstrate = If employee is paid with federal funds, then employee worked on that specific grant program
- Establishes in an audit that allowable costs were maintained

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In the most basic concept, the purpose of time and effort reporting is to demonstrate that the individuals who are being funded with federal grant dollars are actually doing the work that is being supported by the federal government.

Time and effort reporting is documentation to establish in an audit or monitoring that allowable costs were maintained.

OMB Circular A-87

Attachment B

11. Compensation for personnel services

- In general, salaries and wages of employees who work on federal programs may be paid with federal funds as long as appropriate "time and effort" records are maintained

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Time and effort reporting requirements are part of the allowable costs as defined by the U.S. Office of Management and Budgets (OMB). OMB circulars are applied to all federal grants, contracts and cooperative agreements.

OMB Circular A-87 provides detailed rules on the use of federal funds. The circular is entitled "Cost Principles for State, Local, and Indian Tribal Governments." School districts are considered local governments, so this circular applies. Attachment B of this circular includes guidelines on what items are or are not allowed to be paid for with federal funds.

One of the selected items of allowable costs is salaries and fringe benefits. In general, salaries and wages of employees who work on federally funded programs may be paid with federal funds as long as they are working on the grant's objectives and appropriate "time and effort" records are maintained.

Accountability is the Trend

- These are not new requirements
- Focus on accountability and transparency
 - OIG audits of LEAs uncovered millions of unallowable costs charged to grants
- Fiscal component added to OSEP's verification process
- Message from the Office of Inspector General: Relying on the Single Audit is not sufficient

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Before we go into greater detail regarding time and effort reporting, I would like to provide some background on the topic. The expectation that sub-recipients are responsible for time and effort reporting, and that the state education agency is responsible for fiscal monitoring of subrecipients, is not new. OMB A-87, the circular that defines "allowable costs," and includes the rules around time and effort reporting, has been around for decades. However, over the past few years, as the Office of the Inspector General did audits of school districts across the country and found millions of grant dollars to be improperly used or documented, it came to light that state education agencies were not properly monitoring subrecipients.

This pattern of significant OIG audit findings led the US Department of Education, and in our case the Office of Special Education Programs, to include a fiscal component in its monitoring of state education agencies. The component emphasizes the responsibility of the state to ensure fiscal compliance in addition to the Single Audit.

Responsibilities of the SEA

- Distribute funds to LEAs;
- Review and approve applications;
- **Provide technical assistance;**
- Evaluate the performance of projects;
- Ensure resolution of Single Audits; and
- **MONITOR SUBRECIPIENTS**

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One of the responsibilities of a state education agency that awards subgrants, as the Special Education Team does with IDEA funds, is to provide technical assistance in addition to monitoring subrecipients. These responsibilities are clearly outlined in the US Education Department's General Administrative Regulations. The goal of the special education team over the next few years is to highlight different fiscal requirements, those that are requirements of all federal grants and also those fiscal requirements that are specific to IDEA. Time and effort reporting is a requirement that is applied to all federal grants.

Time & Effort Reporting

- Who must complete?
 - ALL employees funded with federal dollars
 - Not contractors or vendors

- Time and effort reporting is required when any part of an individual's salary is:
 - Charged to a federal program
 - Used as match for a federal program

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That being said, all employees charged to federal grants must maintain time and effort reporting. It does not matter if it is IDEA funding, or Title funding, or Perkins – formula, competitive or discretionary - any employee funded with federal grants must document the time they spend working on the grant's objectives to demonstrate that the amount budgeted and claimed is accurate.

If a subrecipient is receiving a federal grant through the Wisconsin Department of Public Instruction, then employees whose costs are claimed as 100/200 objects must be maintaining time and effort records. It is not necessary to keep time and effort reporting of contractors or vendors (those individuals who would be budgeted in the 300 objects – purchased services).

Time and effort records need only be maintained by the sub-recipient of the grant, which may be different than the "fiscal agent." If you are a school district who is a part of a CESA cooperative, it is your school district employees funded with IDEA funds that must be keeping time and effort records. The CESA staff that are funded with school district IDEA funds are actually the vendor and would not be required to keep time and effort records.

Time & Effort Reporting

- Location of the records
 - Kept by the sub-recipient
 - Subject to review
 - Audits
 - Monitoring
 - IDEA Complaints

- No official format

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Time and effort records are housed by the subrecipient and not submitted to the awarding agency. Time and effort records become subject to review during audits, monitoring, IDEA complaints or other situations that require the subrecipient to provide evidence that time funded by the federal grant was spent working towards the grant's objectives.

There is no official format for time and effort reporting records. Instead, the Office of Management and Budgets directs what data must be kept, but not through any type of official federal form.

Failure to Comply

- Largest audit finding of education programs
- Unallowable costs are subject to repayment

- Harvey School District OIG Audit:
<http://www.ed.gov/about/offices/list/oig/auditreports/fy2009/a05h0025.pdf>

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The lack of time and effort reporting is the single largest audit finding by the US Office of Inspector General (OIG). Costs that do not have adequate documentation are deemed “unallowable” and subject to repayment. An OIG audit report posted in November 2008 for the Harvey School District in Illinois listed \$277,207 in questionable costs due to a lack of documentation. Harvey School District has a student population of 3,537. After the audit, OIG recommended that Harvey come up with after-the-fact documentation for the unallowable amount or pay it back – and not just for the current year, but for the preceding three years. Harvey was also required to develop and implement policies and procedures for appropriate time and effort record keeping and to train all staff on appropriate time and effort reporting.

This slide has a link to the Harvey School District audit. It is an excellent example of how all school districts, not just large ones, are subject to the rules set forth by the OMB circulars.

Types of Time Reporting

- Semi annual certification
 - Kept by individuals with a “single cost objective”
 - Completed at least every six months

- Personnel Activity Reports (PARs)
 - Kept by individuals with “multiple cost objectives”
 - Completed at least monthly

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Now, on to exactly what is meant by “time and effort” reporting. There are two types of required time and effort records: semi-annual certifications and detailed monthly reports. The type of record that must be kept is based on the job responsibilities of the individual charged to the grant. The job responsibilities are referred to as either a “single cost objective” or “multiple cost objectives.”

Types of Cost Objectives

- Single cost objective
 - Individual works solely on a single program
 - Special Education

- Multiple cost objectives
 - Individual works on different programs
 - Special Education and Regular Education

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The difference between single and multiple cost objectives is determined by how an employee *works*, **not** how the employee is funded.

Single Cost Objective

- Dedicated to a singular purpose
- Completes semi-annual certifications
 - Signed off by the employee or supervisor with first-hand knowledge of the work at least every six months

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An individual who has a “single cost objective” has a position that is dedicated to a singular purpose. For instance, a special education teacher is considered to have a single cost objective because the teacher works only with special education. An individual who has a single cost objective would complete semi-annual certifications. A semi-annual certification is a sign-off twice a year (usually every six months) by the employee or a supervisor with first-hand knowledge of the employee’s work.

Semi-Annual Certification

- Must include

- Employer's Name
- Employee's Name
- Employee's Position
- Federal Program Title (CFDA #)
- Reporting Period
- Description of the single cost objective
- Employee or Supervisor's signature / date

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There is no official form for semi-annual certifications. A semi-annual certification should identify the employer's name, the employee's name and position, the federal program, the reporting period, and a description of the single cost objective, as well as a signature.

An example of a single cost objective description for IDEA is: *Ensure that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living.*

I just took that from the federal description of the IDEA project, so it would suffice to use that as a single cost objective statement.

Semi-Annual Certification

- Signed by the employee
- OR
- Signed by the supervisor
 - Flexibility allows for multiple sign-off of employees with single cost objectives

- ALWAYS signed after-the-fact

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The certification must be signed either by the employee or a supervisor with first-hand knowledge of the employee's work *after the work has been completed*.

Sample of a Semi-Annual Cert

Janesville School District Semi-Annual Certification Form

This is to certify that the following individuals have worked 100% of their time from July 1, 2009 through December 31, 2010 (FY 2010) under the IDEA (CFDA 84.027) cost objective:

Ensure that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living.

SCHOOL: MONROE ELEMENTARY

<u>Name</u>	<u>Position</u>
Susan Felt	Speech & Language Pathologist
Lynette Vlasak	Occupational Therapist
Matthew Dasse	LD Teacher

I have first-hand knowledge of the work performed by these individuals.

Rebecca Hill, Principal, Monroe Elementary

Signature: *Rebecca Hill*

Date: *01/15/2010*

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OMB Circular A-87 allows for semi-annual certifications to be signed by a supervisor with direct knowledge of the employee's activities without making it required that the employee signs it. LEAs can use this flexibility to create semi-annual certifications for several employees in a single document, signed by a supervisor.

Multiple Cost Objectives

- Employee's with multiple focus areas
- Completes personnel activity reports (PAR)
 - Completed at least monthly
 - Demonstrates the amount of actual time spent working on the federal grant objective

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An individual who has multiple focus areas needs to complete monthly Personnel Activity Reports, often referred to as "PARs."

An individual with "multiple cost objectives" has a position that is dedicated to multiple purposes – in education, it is easiest to think of it as an employee who serves different student populations or has very distinct differences in work responsibilities. For instance, a school psychologist may work with both general education and special education students, and would qualify as having multiple cost objectives. An individual with multiple cost objectives must keep personnel activity reports, which are completed at least monthly and must be signed by the employee.

PARs are a verification that although the employee wears multiple hats, the time charged to the federal grant reflects the actual time the employee spent working on the grant's objectives.

Personnel Activity Reports (PAR)

- Must include
 - Employer's Name
 - Employee's Name
 - Employee's Position
 - Federal Program Title (CFDA #)
 - Reporting Period
 - Break-out of the employee's work schedule
 - Employee's signature / date

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As is the case with the semi-annual certification, there is no standard format used for PARs. The required information that must be on PARs is the employer's name, the employee's name and position, the federal program, the reporting period, a reflection of the employee's total work schedule, and the employee's signature.

PARs must:

- Be completed after-the-fact
- Reflect actual work performed (not budgeted)
- Must account for total activity of employee
- Be completed *at least* monthly
- Signed and dated by employee

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For employees working on multiple cost objectives, these standards must be met:

The PAR must be created after the work has been executed. Projections of how an employee is expected to work or position descriptions would not be sufficient.

The PAR must account for the total activity for which each employee is compensated, including part-time schedules or overtime.

The PAR must be prepared at least monthly and must coincide with one or more pay periods; and

The PAR must be signed and dated by the employee. Unlike the semi-annual certification, signature of a supervisor alone would not be sufficient, however, the supervisor could sign in addition to the employee.

Accounting for Total Activity

Janesville School District Personnel Activity Report

Employee: Joy Binstock Title: Psychologist
 Reporting Period: April 1- 30, 2010 Fiscal Year: 2010

Cost Objective	Program	Distribution of Time	# of Hours of Time
Special Education	IDEA Flow-Through / CFDA 84.027	15%	26.5
Special Education	Non-Federal Activities (aidable costs)	70%	123
Regular Education	Non-Federal Activities	15%	26.5
Indirect Time	Vacation / Sick Leave	0%	0
		100%	176

I hereby certify this report is an after-the-fact determination of the total activity and actual effort expended for the period indicated, and I have full knowledge of 100% of these activities.

Signature: Joy Binstock Date: 05/03/2010

There must be supporting documentation demonstrating how these hours were determined

There is 176 total work hours in the month of April

PARs are "after the fact" and the signature date must reflect this. A supervisor's signature is not required

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As you can see in this example of a PAR, the employer's name, the employee's name and title, the reporting period and fiscal year have all been identified. There is also a signature of the employee. The signature date is after the reporting period.

When it comes to multiple cost objectives, OMB stresses accounting for an individual's total activity. A school psychologist may be an individual who needs to complete PARs instead of a semi-annual certification. If the school psychologist is funded through IDEA but is also funded locally to work with students who do not have disabilities, she has "multiple cost objectives" because she works with both special education and non-special education students. Her monthly PARs would document 100% of her work schedule and identify the amount of time she spends working only with students with disabilities and time working on "non-federal activities" (which may include state categorical aid time and local non-special education time).

Although OMB does not specify if the time must be recorded in hours or percentages, best practice would indicate that tracking time by hours will lead to a more accurate and specific accounting of actual time spent on a federal grant objective.

The PAR must be supported with documentation of actual effort, not estimates.

PARs Documentation

- There must be documentation to verify underlying basis of report
 - Actual effort, not estimated effort
 - Consult supporting documentation when completing monthly report
 - Calendar, work product, time log
 - Audits have specifically looked at what documentation / system was used to complete the PARs

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Evidence must be kept that substantiates the hours that are recorded on the PARs. The question that must be answered is: "What is the basis for the times you provided in your PAR?"

Supporting documentation could be a work calendar, work product, time log, or class schedule. The employee who signs off on the PAR must have supporting documentation for the time reported. Relying on time estimates identified in the grant budget rather than actual time recorded through a work calendar or class schedule will result in an audit or monitoring finding of unallowable costs.

Forms for PARs

- There is no standard form
- It is the responsibility of the LEA to put into place their own systems of accountability following the guidelines in Circular A-87
- Work with what you already have – with a tweak, do you meet the requirements?

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I want to keep coming back to the fact that there are no forms for time and effort reporting. The belief is that if the sub-recipient understands the data that must be collected on individuals charged to federal grants, than existing systems could be used to meet the requirements.

Multiple Cost Objective – Single Funding Source

CFDA 84.027-Flow-through

- Special Education and related services to children ages 3 to 21
- Coordinated Early Intervening Services
- Equitable Services Proportionate Share

CFDA 80.031 - Preschool

- Special Education and related services to children ages 3 to 5
- Equitable Services Proportionate Share

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It is not a rule of thumb that if an individual has a single federal funding source then the individual automatically has a single cost objective. IDEA Part B entitlement actually has several cost objectives, even though there are only two funding sources – flow-through and preschool.

A person could be 100% funded with flow-through dollars to provide special education related services to students with disabilities, but also provides behavioral interventions to students without disabilities, and services to parentally placed private school students. This individual would need to complete PARs because they have three distinct cost objectives, even though the funding source is the same.

TIME & EFFORT EXAMPLES

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I'm going to work through some examples of individuals with single or multiple cost objectives, and then the type of reporting that must be kept.

Single Funding Source Single Cost Objective

- *A teacher providing only special education services 100% of the day is charged 100% to the IDEA grant.*

Funding Source: **IDEA Only**

Cost Objective: **Special Education Only**

Reporting Type: **Semi-Annual Certification**

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This is an example of a Single Funding Source with a Single Cost Objective.

(Click) The description: A teacher provides only special education services and her entire salary is charged to the IDEA grant.

So this means:

(Click) She has a single funding source

(Click) She has a single cost objective because she only works with special education

(Click) and the time and effort reporting that must be kept for this employee is semi-annual certification.

Multiple Funding Sources Single Cost Objective

- *A special education teacher is funded with IDEA funds and funds eligible for state special education categorical aid.*

Funding Source: **IDEA, Local & State**

Cost Objective: **Special Education Only**

Reporting Type: **Semi-Annual Certification**

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This is an example of a Single Funding Source with a Single Cost Objective.

(Click) The description: A teacher provides only special education services, but her salary is covered with IDEA funds, local funds and state categorical aid.

So this means:

(Click) She has multiple funding sources, BUT

(Click) She has a single cost objective. And remember, the time and effort reporting is based on the cost objective – how the employee works - not how the employee is paid, and so...

(Click) the time and effort reporting that must be kept for this employee is semi-annual certification.

Multiple Funding Sources Single Cost Objective

- *An early childhood special education teacher is funded 80% with flow-through and 20% with preschool entitlement funds.*

Funding Source: **IDEA 611 & IDEA 619**

Cost Objective: **Special Education Only**

Reporting Type: **Semi-Annual Certification**

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This can be confusing, so I want to do one more example of an employee with multiple funding sources but a single cost objective. In this example, an early childhood special education teacher is funded partially out of the IDEA flow-through grant and the remaining amount is charged to the IDEA preschool grant. So then:

(Click) She has multiple funding sources, BUT

(Click) Since there is no difference in the activities funded by the two funding sources, she has a single cost objective, and so...

(Click) the time and effort reporting that must be kept for this employee is semi-annual certification.

However, because there are two federal funding sources for this individual, the semi-annual certification should identify the CFDA numbers for the two different federal funding sources.

Multiple Funding Sources Multiple Cost Objectives

- *A teacher provides special education to students 60% of the time (funded by IDEA) and bilingual instruction to English Language Learners 40% of the time.*

Funding Source: **IDEA & Local**

Cost Objective: **Special Ed and ELL**

Reporting Type: **PARs**

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This is an example of an individual with multiple funding sources and multiple cost objectives.

(Click) A teacher provides special education services to students with disabilities as part of their IEP requirements but also provides bilingual instruction to English Language Learners the rest of his time. The time he spends working with students with disabilities is charged to the IDEA grant and the time with the ELL students is funded with local dollars. So then:

(Click) He has multiple funding sources; and

(Click) Since the services are not the same, two cost objectives are reported, so

(Click) the time and effort reporting that must be kept for this employee is personnel activity reports.

Single Funding Source Multiple Cost Objectives

- *A school psychologist works 50% of the day with special education and 50% of the day providing coordinated early intervening services (CEIS).*

Funding Source: **IDEA 611**

Cost Objective: **Special Ed and CEIS**

Reporting Type: **PARs**

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It is possible to have an employee who has multiple cost objectives, but a single funding source.

(click) In this example, a school psychologist works with both special education students and also with general education students through coordinated early intervening services. The special education services and the coordinated early intervening services are all funded through the IDEA grant. So...

(Click) He has a single funding source; but

(Click) the two activities are not the same and two cost objectives must be reported, so

(Click) the time and effort reporting that must be kept for this employee is personnel activity reports.

The school psychologist must document his time to ensure that the amounts charged to flow-through and to CEIS are accurate. To do this, each month the school psychologist tracks the time spent on each of the two cost objectives: Special Education and CEIS.

Some brief words about payroll

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Earlier in the presentation I mentioned that PARs, the monthly detailed time and effort reports, could not be based on budgeted or estimated time allotments, but must be based on after-the-fact actual time spent on the objectives.

This also holds true for grant-funded salary expenditures. Salaries may be claimed based on the budgeted amounts up to a certain point, but they must always end up reconciling with the actual time documented in the PARs.

When “reconciliation” is required

- IF: Payroll is processed based on budgeted or estimated time and activities...
- THEN: Payroll records must be compared to time and effort reports *at least quarterly*.

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If the sub-recipient’s payroll is processed based on budgeted or estimated time and activities rather than actual costs, then payroll records must be compared to time and effort reports at least quarterly.

When is an accounting adjustment required?

If the difference is 10% or more:

- Payroll charges must be adjusted at the time of the comparison.
- **AND:** The following quarter's estimates must be adjusted to more closely reflect actual activity.

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During that quarterly comparison, if the difference between what is budgeted and what is documented in the time and effort reporting is greater than 10 percent, then payroll charges must be adjusted at the time of comparison. In addition, subsequent quarterly salary expenditure estimates must be amended to more closely reflect actual activity.

When is an accounting adjustment required?

If the difference is less than 10%:

- No action required until the end of the year.
- **BUT:** At year-end the 10% threshold does not apply - in the final quarter, payroll charges for the year must be adjusted to reflect actual time spent as supported by time and effort reports.

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If the difference between what was claimed in expenditures based on budgeted salaries and what is documented in the time and effort reporting is less than 10 percent, the adjustment does not need to occur until the end of the fiscal year. However, in the final quarter, payroll charges for the year must be adjusted to reflect actual time spent as supported by the time and effort reports.

Frequently Asked Questions

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Question #1

- ***Didn't Wisconsin Act 221 eliminate the necessity for time and effort reporting of school psychologists, nurses, social workers, and guidance counselors?***

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Didn't Wisconsin Act 221 eliminate the necessity for time and effort reporting of school psychologists, nurses, social workers, and guidance counselors?

Act 221?

- No - Act 221 is related to **state** funding
- All individuals funded with federal funds must keep time and effort records in compliance with OMB Circular A-87

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The answer is no, and it's because we are talking about two different funding sources. Wisconsin Act 221 eliminated time and effort reporting for state special education categorical aid reimbursements. OMB Circular A-87 requires time and effort reporting (semi-annual certification or personnel activity reports) by all personnel funded by federal grants, including IDEA. No state law can supersede OMB A-87 requirements for the administration of federal grants.

Question #2

- **How do we document professional development attendance?**

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How do we document professional development attendance?

Professional Development...

- Develop a policy for documentation of tracking professional development
 - Sign-in sheets
 - Verify that those charged to the grant actually attended the professional development
 - Follow whatever system you create!!

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Each sub-recipient should have documented time and effort recording procedures. In those procedures, the sub-recipient should determine how individuals attending professional development activities, whose salaries will be charged to a grant for that time period, will document the time. Most sub-recipients create a “sign-in” process in which the attendees sign-in for the professional development activity and then the business office ensures that only the individuals who signed in for the activity are actually charged to the grant.

Be certain though that you follow whatever policy you create! There was a finding in which an LEA had a policy that individuals would sign in at the beginning of the event and then sign out (which wasn't required, it was their own policy). When audited, it was discovered that it wasn't consistently being implemented – individuals were signing in, but “sign-out” signatures were not always captured. So this ended up being a finding because the LEA did not follow its own time and effort policies.

Question #3

- ***Are substitute teachers or other temporary personnel required to keep time and effort records? How are their salaries charged?***

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Are substitute teachers or other temporary personnel required to keep time and effort records?

Substitutes...

- Yes
- Options:
 - Keep track of substitute staff in the same manner as tracking professional development salaries / stipends: have the subs sign off on a time and effort record after the period of work is complete
 - Could the substitute qualify as a single cost objective?

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Yes. Go with the common sense approach: any individual who is charged to a federal grant needs to have supporting documentation that the time spent funded by the grant was actually spent working on the objective of the grant. So what documentation could you use that demonstrates that a substitute was replacing individuals who are meeting the objectives of the grant?

Question #4

- ***If an employee has a supplemental contract in addition to a teaching contract, allowing them to work at a different job after school, e.g., athletic coach or tutor, is the employee required to keep time and effort records for the supplemental contract?***

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If an employee has a supplemental contract in addition to a teaching contract, allowing them to work at a different job after school, e.g., athletic coach or tutor, is the employee required to keep time and effort records for the supplemental contract?

Supplemental Contracts...

- **Single contract**
 - One set of time and effort records that reflects 100% of the employees time
- **Supplemental contracts**
 - Determine cost objective for each contract
 - Single – Semi-annual certification
 - Multiple – PARs

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This is a long answer...

If an employee works under a single contract, a single set of time and effort records must be kept to capture the entire time the employee works in the position.

If an employee works additional hours as part of the employees' regular job, the hours must be included in the single set of time and effort records. The single set of time and effort records must capture 100% of the work in the position. The time and effort records are used to distribute costs for the employee's entire compensation, including compensation from the base contract, a supplemental contract, or a stipend.

However, if an employee works in two distinct positions, e.g., a special education teacher during the school day and coach after school, each position is evaluated separately to determine if time and effort reporting is required and the type of reporting required (semi-annual certifications or PARs).

If the school-day position is paid with federal funds and the after-school position is paid with non-federal funds, time and effort records must be kept for the school-day position but not the after-school position. If both positions are paid with federal funds, then two separate sets of time and effort records must be kept.

For example, a teacher may have a base contract to provide learning disabilities services part of the school day to parentally placed private school children and teach public school enrolled students with disabilities the rest of the school day. The employee also may have a supplemental federally-funded contract through the "21st Century Learning" program to provide activities after school.

PARs would be required for the base teaching contract, while only semi-annual certifications would be required for the after-school contract.

Question #5

- **What if a school psychologist is only funded with IDEA to provide three weeks of service during the month of June to provide extended school year services? Does she have to keep PARs for the whole year?**

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What if a school psychologist is only funded with IDEA to provide three weeks of service during the month of June to provide extended school year services? Does she have to keep PARs for the whole year?

Limited time period...

- No, would not have to keep PARs for the whole year for a short-term activity. Only keep PARs for the time period the activity takes place and is funded.

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The school psychologist would only have to keep time and effort records, and in this case PARs, for the time charged to the grant in June. There would be no need to keep PARs for the preceding school year months if the individual was never charged to any federal grants. However, be careful with this one – a limited amount of time in a limited time frame is different than a limited amount of time spread out across the year. If the school psychologist is charged to the grant for the equivalency of two days a month, the school psychologist would need to keep personnel activity reports monthly to correspond with the payroll expenditures.

Question #6

- ***Can someone have a single cost objective, but still perform duties such as study hall monitoring or recess duty?***

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Can someone have a single cost objective, but still perform duties such as study hall monitoring or recess duty?

Recess Duty...

- If the amount of “other duties” is equitable to the assignments of other like employees not funded by grants, and the amount of time dedicated to these duties are a small percentage compared to the individual’s normal work schedule, then it will not change the individual’s status as a single cost objective.

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Yes, as long as it is an assignment that is assigned to all other staff equitably. Activities such as recess and lunch room duty, as long as they are equitably assigned to staff, are not considered in keeping an individual from a single source objective status. However, if a special education teacher has four study halls assigned every day, and no other teacher has more than one, then that teacher would no longer qualify as having a single source objective.

Question #7

- ***How do you do monthly personnel activity reports for school staff who only work nine months but are paid out over twelve months?***

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How do you do monthly personnel activity reports for school staff who only work nine months but are paid out over twelve months?

Nine month employees...

- PARs are only required for the time period that the individual works – so a 9 month employee, even if paid out over 12 months, would keep records for when the activities actually occurred.

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PARs are only required for the time period that the individual works – so a 9 month employee, even if paid out over 12 months, would keep records for when the activities actually occurred.

Question #8

- **How do office staff or special education administrators keep track of time?**

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How do office staff or administrators keep track of time?

Time tracking

- Your district should determine the best method for time and effort reporting and mandate this through policies and procedures. Addressing reliable source materials would be a best practice.

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Your district or agency should determine the best method for time and effort reporting and mandate this through policies and procedures. Addressing reliable source materials in those policies and procedures would be a best practice.

Question #9

- **We have a teacher who's single cost objective is CEIS, but we only charge a percent of her salary to a federal grant. Would this be monthly reporting or semi-annual certification?**

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We have a teacher who's single cost objective is CEIS, but we only charge a percent of her salary to a federal grant. Would this be monthly reporting or semi-annual certification?

CEIS...

- PARs would be required
 - The CEIS objective covers intervention-based services for students who have been identified as at risk for failure but have not been identified as students with disabilities.
 - Very specific service recipients
 - Does not cover universal activities
 - May not supplant Title I activities

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This is a trick question. By now I'm sure you are pretty confident in time and effort reporting requirements, and this seems like a too easy question to have at the end. A single cost objective of CEIS, with only a portion of the salary charged to flow-through – of course it must be semi-annual certification!

But...(click) anyone charged to CEIS will pretty much automatically qualify for PARs, unless the individual is 100% funded with IDEA CEIS funds. The reason is because CEIS has a very narrow cost objective. CEIS can only fund interventions, no universal activities, for a targeted group of students. It is highly unlikely, although I guess not impossible, that an individual's full-time work is dedicated to the narrow requirements of CEIS. It is more likely that the individual does many things in regards to the Rtl system, one of which is the activities allowed under CEIS.

This will be your judgment call, but look at the person's entire work responsibilities and verify if all of her activities *could* be funded with CEIS. If not, the individual needs to complete PARs.

Question #10

- **Does a staff member charged to project 011 have to keep time/effort records?**

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Does a staff member charged to project 011 have to keep time/effort records?

Project 011

- “011” is the project code for Wisconsin state special education categorical aid
 - Not federal funding
 - No time / effort reporting required for state funding unless directed by the program to do so
- “340” is one of the project codes for federal funding
 - If charged to 011 and 3**, time/effort required

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Project 011 is the code used to identify costs that are eligible for state special education categorical aid reimbursement. Individuals charged solely to this project do not have to keep time and effort reporting. However, if an individual is charged to project 011 and also 340, which is one of the project codes for federal funding, the individual would have to keep time and effort records because they are now also being funded by a federal grant. If the individual has to keep PARs because they have multiple cost objectives, the PARs would reflect the person's total work time – both the time that is covered by the 011 project and the time covered by the 340 project.

Question #11

- **Our school psychologist is full-time and part of his salary is covered by flow-through. The school psychologist normally completes his reports and other special education paperwork beyond the school day. How should we be documenting these activities that go beyond the work day but are a part of the regular school-day contract?**

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Our school psychologist is full-time and part of his salary is covered by flow-through. The school psychologist normally completes his reports and other special education paperwork beyond the school day. How should we be documenting these activities that go beyond the work day but are a part of the regular school-day contract?

Salaried employees...

- Account for 100% of the individual's time
- OMB does not direct, but tracking hours would be the easiest way to do this
- To determine cost allocation, compare the hours worked for the federal objective against the contracted work hours.

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It's sometimes hard to navigate between the expectations of OMB Circular A-87 and the reality of salaried employees. Salaried employees do not keep hourly time sheets. The work week may be 35 hours or 40 hours depending on the contract, but that doesn't mean that the employee only works 40 hours. OMB A-87 directs the sub-recipient to record 100% of the individual's time if completing PARs. This means that the school psychologist would need to report all of the hours worked. So if the school psychologist begins work at 8 a.m. and spends two hours in the morning working with students with disabilities, an hour in the afternoon consulting with a special education teacher and then two hours after the workday ended at 4 p.m. finishing up special education paperwork, the school psychologist should identify, in the PARs, all of the hours he worked – which in this case would be 10 hours.

And then to simplify this, if the normal work day is 8 hours, you would take the 4 hours spent on the special education objective to determine that 50% of the day was spent on grant supported work. You wouldn't charge it against the full 10 hours if that is not the normal work day.

Question #12

- **We have a staff member who is charged to a grant but on maternity leave...how do we keep PARs for this individual?**

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We have a staff member who is charged to a grant but on maternity leave...how do we keep PARs for this individual?

Documenting Leave...

- Maternity leave, vacation, sick leave, personal days, etc., should be prorated to the funding source in the same manner as the regular work day
- In instances of long absences (maternity leave), use either the budgeted FTE or the previous quarter's actual FTE

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It is allowed to charge leave to the federal grant; however, it must be in proportion to

Question #13

- **We might not have been doing time and effort reporting absolutely correctly...could we recreate time and effort reporting for past months and have teachers sign off using the current date?**

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We might not have been doing time and effort reporting absolutely correctly...could we recreate time and effort reporting for past months and have teachers sign off using the current date?

Catching up...

- Must be based on reliable source documentation
- Don't falsify signature dates
- Review your procedures for time and effort reporting
- Train all staff on the procedures!

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Reviewing the OIG audits of LEAs in which there were findings of unsupported costs, the recommendation has always been for the LEA to provide OIG with after-the-fact documentation for the unsupported salaries. In my opinion, it would be better to have after-the-fact documentation than no documentation at all. But even after-the-fact documentation must be based on some type of reliable source materials – making up numbers with no support and having staff sign off is worse than not doing it because then you are asking staff to make fraudulent claims. And don't ever falsify signature dates – if the work took place last September, don't have the staff person go back and sign and date it as September. Have the staff employee sign it with the current date – it is still a documentation of work done after the fact.

I cannot guarantee that going back and recreating records would avoid an audit or monitoring finding. It certainly won't avoid a finding if the after-the-fact documentation is not based on reliable sources. But if you do end up with a finding for time and effort reporting, you are going to have to go back and provide the documentation anyway – so consider this one step ahead of where you might end up.

Another recommendation by OIG made over and over again is that the sub-recipient must have policies and procedures in place for time and effort reporting, and that staff **MUST** be trained on the policies and procedures on a regular basis.

For additional information

- IDEA Funding Technical Assistance:
<http://dpi.wi.gov/sped/lpp-budgets.html>

- Time & Effort Reporting TA Document:
<http://dpi.wi.gov/sped/pdf/time-effort-TA.pdf>

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This slide has additional links to all of our current technical assistance materials and also a link to a written time and effort reporting technical assistance document.

At this time I will answer those questions that I can; however, if you have a specific situation in which you are trying to figure out, I'll have to take your question back to our fiscal monitoring workgroup to work out the answer or to direct you to additional resources. If you have a more generic question about time and effort reporting, or want to clarify something you heard, I can attempt to answer your questions. And, as always, those questions we can answer we will follow-up by adding to our FAQ section on our IDEA funding technical assistance web page.