



Capturing Time and Effort



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Office of the State Superintendent of Education
(OSSE)

Federal Grants Management Conference

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Marriott Wardman Park

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The Current OMB Rules



- A-87 : State and Local Educational Agencies
- A-21: Institutions of Higher Education
- A-122: Nonprofit Organizations
- 48 C.F.R. Part 31: For Profit Agencies



How much do you know about Time and Effort??



Question



An administrator works approximately half time on NCLB Title I, Part A, and half on IDEA. She is required to keep:

- A. Monthly PARs
- B. Semi-annual certifications

Question



A director works approximately half time on NCLB Title I, Part A, and half on Title I, Part C (Migrant). She is required to keep:

- A. Monthly PARs
- B. Semi-annual certifications

Question



A Title I program director works on a single cost objective but is paid out of multiple funding sources (i.e. Title I, A and state funds), the program director must complete a PAR.

- A. True
- B. False

Question



An administrator works approximately half time on NCLB Title I, Part A, and half on non-federal activities, but is paid 100% from Title I, Part A. She/He is required to keep:

- A. Monthly PARs
- B. Semi-annual certifications
- C. Bail money on hand

Question



The NCLB director works on Title I, Part A, Title II, Part A, and 21st Century. The district consolidates its NCLB administrative funds. The director is required to keep:

- A. Monthly PARs
- B. Semi-annual certifications

Question



The district has a contract with an SES provider for afterschool tutoring for students. The contract is paid with Title I funds. Do the contractor's employees need to keep time and effort records?

- A. Yes
- B. No

Question



A Title I paid classroom teacher in a targeted assistance school must keep time and effort records.

- A. True
- B. False

Question



In a schoolwide program, a teacher is paid with Title I funds and works 100% on the schoolwide program plan. What kind of time and effort records is she required to keep?

- A. Semi-annual certifications
- B. Monthly PARs

A-87 OMB Circulars Time and Effort Rule



- If federal funds used for salaries, then time distribution records are required in order for the cost to be allowable.
- **Must demonstrate (allocability)!**
 - That the employee worked on that specific federal program/cost objective.
 - Exception – when time on another program is *de minimus* or provides only an incidental benefit.
- Time and Effort Documentation **MUST** be used to reconcile salary and wages to ensure all costs are allocable to the federal programs charged!!

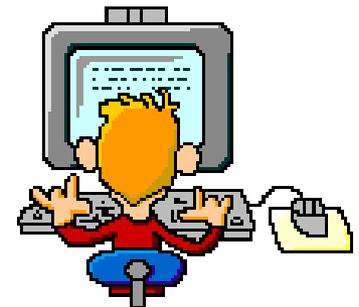
Who must participate?



- *All employees who are paid with federal program*
 - Not contractors

AND

- Some employees paid with non-federal funds
 - When salaries are used for match purposes



A-87: If employee works 100% on single cost objective



- **Semi-Annual Certification**
 - Completed at least every six months
 - Signed by a supervisor with knowledge of the employee
 - After-the-fact record (dated)
 - Accounts for the total activity for which employee compensated
 - Must coincide with one or more pay periods

A-87: If employee works on multiple cost objectives



- Personnel Activity Reports
 - After-the-fact record (dated)
 - Accounts for the total activity for which employee compensated
 - At least monthly
(unless substitute system)
 - Signed by the employee
 - Must coincide with one or more pay periods

Distributing Payroll Costs – Reconciliation



- Quarterly comparison of estimates to actual costs:
 - If difference is less than 10% - annual adjustment.
 - If difference is more than 10% - quarterly adjustment.



What is a Single Cost Objective???

OCFO: “The criteria for whether an employee may document time and effort using a semiannual certification or must fill out a monthly PAR can be confusing.”

What is a “Cost Objective”?



- A-87 Definition: A function, organizational subdivision, contract, grant or other cost activity for which cost data are needed and for which costs are incurred.



- It is possible for multiple programs to have the same cost objective, which creates confusion over whether the presence of a single cost objective or being funded by multiple programs should determine what time-and-effort documentation an employee must complete.

OCFO Guidance (cont.)



- It is possible to work on a single cost objective even if an employee works on more than one Federal award or on a Federal award and a non-Federal award.
- ***The key to determining whether it is a single cost objective is whether the employee's salary and wages can be supported in full from each of the Federal awards on which the employee is working or from the Federal award alone if the employee's salary is also paid with non-Federal funds.***

OCFO Guidance Practical Examples of Single Cost Objectives:



- **Title I, Part A funds and State compensatory education funds**
 - An LEA supports a supplemental math teacher to serve low-achieving students with 50 percent Title I, Part A funds and 50 percent State compensatory education funds.
 - Teaching math to low-achieving students is a single cost objective because it can be fully supported under Title I, Part A.
 - Only a semiannual certification, therefore, is required even though the employee's salary is supported by a Federal award and a non-Federal award.

OCFO Guidance Practical Examples of Single Cost Objectives:



- **Funds under Sections 611 and 619 of the Individuals with Disabilities Education Act (IDEA)**
 - A preschool special education teacher is funded with 50 percent IDEA section 611 funds and 50 percent with IDEA section 619 funds.
 - Teaching preschool special education is an allowable activity under both IDEA sections 611 and 619.
 - Accordingly, the teacher is performing a single cost objective even though she is supported with funds from two separate Federal awards; therefore, she need only file a semiannual certification.

OCFO Guidance Practical Examples of Single Cost Objectives:



- **Title I, Part A funds and CEIS (comprehensive early intervening services) funds under IDEA**
 - A teacher works with low-achieving students and is supported with 60 percent Title I, Part A funds and 40 percent CEIS funds.
 - Teaching low-achieving students is a single cost objective because it can be fully supported under both Title I, Part A and CEIS.
 - Only a semiannual certification, therefore, is required even though the employee's salary is supported by two Federal awards.

OCFO Guidance Practical Examples of Single Cost Objectives:



- **Title I, Part A funds and local funds**
 - An LEA supports an elementary school teacher with local funds but pays her with Title I, Part A funds to provide after-school tutoring for low-achieving students.
 - Although the teacher could not be paid with Title I, Part A funds to provide elementary education, the portion of her time spent on after-school tutoring is easily separated from her teaching position by her schedule.
 - Accordingly, the teacher's after-school tutoring is a single cost objective and she need only file a semiannual certification for the time she works in the after-school program supported by Title I, Part A funds.

OCFO Guidance Practical Examples of Single Cost Objectives:



- **State leadership funds under the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) and State funds**
 - A State curriculum specialist who develops new career and technical education courses and initiatives is funded 50 percent with Perkins IV funds reserved under section 112(a)(2) for State leadership and 50 percent with State general funds.
 - Career and technical education curriculum development is a single cost objective because it can be fully supported with State leadership funds under Perkins IV.
 - Only a semiannual certification, therefore, is required even though the employee's salary is supported by a Federal award and State funds.

Time and Effort Update



- USED issued new guidance that aims to further reduce the burden of documentation requirements while also ensuring that the overall objective of time-and-effort reporting continues to be met.

System Guidelines



- Eligibility for 'new' system
 - Currently work on a schedule that includes multiple activities or cost objectives that must be supported by monthly personnel activity reports.
 - Work on specific activities or cost objectives based on a predetermined schedule.
 - Not work on multiple activities or cost objectives at the exact same time on their schedule.

System Guidelines



- In lieu of personnel activity reports, eligible employees may support a distribution of their salaries through documentation of an established work schedule.
- Work schedule may be in a style or format already used by an LEA.

System Guidelines-Employee Schedules



- Must indicate a specific cost objective that the employee worked on for each segment of the employee's schedule
- Must account for the total hours for which each employee is compensated during the period reflected on the employee's schedule.
- Must be certified at least semiannually and signed by the employee and a supervisor having firsthand knowledge of the work performed.

Questions?



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