

All employees whose compensation includes federal funds are required to track time and effort, regardless of whether their salary is primarily supported by state or local funds. This requirement encompasses situations where an employee's salary, funded by state or local sources, is utilized to fulfill a required "match" in a federal program. Staff involved in the district's special education maintenance of effort calculation are also included in the mandate to track time and effort, as are full and part-time employees, stipends for employees administering federal programs, and substitute teachers.

The district is required under federal regulations to maintain time and effort records in order to charge the costs of personnel compensation to federal grants. Such records will accurately reflect work performed and must:

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

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 office 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.

PARs 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.

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

It is critical for payroll charges to match the actual distribution of time recorded on the monthly certification documents. The district may initially charge payroll costs based on budget estimates. 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 such that the final amount charged to the federal award is accurate, allowable, and properly allocated. The [identify responsible employee or office, e.g. business manager or business office] 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 office. The Federal Programs office will verify the final paperwork as complete prior to issuance of the final paycheck.

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:

2 CFR Part 200 et seq. – Education Department General Administrative Guidance

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