

Auburn School District - Time and Effort Procedures

Time and effort reporting is required by the federal government to document time spent on federal funds.

Uniform Grant Guidance in §200.430(i) requires that all salaries charged to a federal grant must be based on records that accurately reflect the work performed and that these records be incorporated into the subrecipient's official records.

Bulletin No 039-24 issued by the Washington Office of Superintendent of Public Instruction states in part, "...LEAs must document their time and effort system (policies and procedures), including how they will meet each of the requirements, and implement internal controls to ensure..." compliance with the Uniform Grant Guidance. "...Additionally, although the T&E guidance does not require signatures, OSPI will continue to require LEAs to include an employee signature on the time and effort to document and certify the approval of the activity reported. We also encourage the supervisor to sign the time and effort documentation as an added internal control."

Time and effort reporting is the process used to certify the time that an employee works for federal funding. The purpose of this procedure is to document Auburn School District's agency-wide process.

Program Managers are administrative staff who understand the requirements of the program/grant, establish the budget for the program/grant, and monitor—on a frequent basis—expenditures made using grant funds. The procedures below provide information about steps to be taken and tools available for support of timely and accurate time and effort reporting.

Ensure Staff is Coded to the Correct Account Code Before September Payroll is Processed:

As part of the budget process for the new year ensure staffing for the program is correct in Qmlativ and Red Rover.

- Qmlativ:
 - Work with Human Resources to ensure staff is coded correctly prior to the start of the new year.
- Red Rover:
 - Review employees in Red Rover to confirm staff is coded correctly.
 - Report any discrepancies to Human Resources (HR). If employees are missing from the list, ask HR to code the missing employees to the program.

Review new reports once all corrections are made. If corrections were not made or additional corrections are needed, follow the process listed below under, "Changes to Salary Distributions."

Confirm the September payroll postings are correct within the first 5 days of October.

- To identify employees charged to the program, the Qmlativ "Transaction Recap Qmlativ Produced Data – WSIPC (ASD)" report or the Qmlative "Transaction Recap w/Pay Type Code" report are recommended. Run the report for object codes 2000 through 3999.

- To verify the employee’s distribution between programs is correct, use the Position – Assignment – Assignment Pay Types screen, or the Account – REPORTS – Pay Account Distribution Details Report.
- Refer to the “Changes to Salary Distributions” section below if corrections are needed.

Time and Effort Documentation:

Run reports identifying all employees (certificated, classified, substitute, administrator, etc.) who were charged to the program. Obtain monthly or semi-annual time and effort signatures as appropriate. The Qmlativ “Transaction Recap Qmlativ Produced Data – WSIPC (ASD) – Account Code” report is recommended to identify employees charged to the program. Run it for object codes 2000 through 3999.

Determine which staff are eligible for semi-annual time and effort and which are required to sign monthly time and effort.

- Semi-Annual time and effort:
 - Types of pay:
 1. Regular pay: All regular pay will be covered under semi-annual reports signed by the employee, unless a group certification (see definition below) is used for schoolwide programs.
 2. Supplemental contracts and stipends:
 - For additional work:
 - Pay for additional work is spread through the remainder of the employee’s contract. Therefore, semi-annual time and effort certification is applicable.
 - Pay for having a certification, longevity, technology, and/or other similar items does not require time and effort signatures.
 - Semi-Annual time and effort signatures should be obtained twice a year.
 1. 10-month employees:
 - September through February
 - March through June
 2. 12-month employees:
 - September through February
 - March through August
 - Semi-annual time and effort signatures should be obtained within 30 days of the semi-annual reporting period end-date listed above.
 - June time and effort should be completed and signed on the last working day of June. Signatures cannot be made prior to the last working day of the month. Please make sure to obtain signatures before people leave for the summer.
- Monthly time and effort – extra hours:
 - Trainings/workshop/events put on by the District (the District controls the training sign in form).
 1. The sign in form, whether paper or digital, will list:
 - Program(s) that will pay for the workshop.
 - If more than one program, what percent is charged to each program.

- The workshop date, start and end time.
 - The name of the workshop.
 - Recommended - add a place for the substitute name which could help reconcile substitutes charged to the federal program.
2. Each attendee signs in.
 - When the employee signs in for the training/workshop, the employee's signature covers their substitute for time and effort even if the employee's regular pay is from a non-federal program and the substitute pay is from a federal program. The employee attending the training/workshop is the employee receiving the benefit from the training and is therefore best qualified to account for the use of these federal funds.
 3. It is recommended to confirm that substitute pay is correct each month and that time and effort documentation for these trainings is completed monthly.
- Trainings/workshop/events NOT put on by the District (the District does not control the training sign in form).
 1. The federal program authorizing extra hours and/or substitute pay needs to obtain a time and effort signature from the employee who attended the training/workshop.
 2. The signature of the employee who attended the training/workshop covers the substitute for time and effort even if the employee's regular pay is from a non-federal program and the substitute pay is from a federal program. The employee attending the training/workshop is the employee receiving the benefit from the training and is therefore best qualified to account for the use of these federal funds.
 3. It is recommended to confirm that substitute pay is correct each month and that time and effort documentation for these trainings is completed monthly.
 - Extra hours (not including workshops/trainings listed above):
 - Employees submit extra hours for payment. Their signature, whether on paper, electronic, or in email is sufficient documentation for Time and Effort reporting.
 - Extra hours should also be included in the semi-annual time and effort document for employees whose regular pay is charged to a federal program.
 - Extra hours for employees whose regular pay is not charged to a federal program should sign a monthly time and effort form listing just the extra hours.
 - Monthly time and effort – substitute pay (not including subs for trainings/workshops/events as defined above):
 - If staff is out for a full calendar month or longer, the substitute(s) sign a monthly time and effort form. The best practice is to obtain required time and effort signatures from substitutes within 30 days of month end.
 - If staff is out for less than a full calendar month, the employee signs time and effort semi-annually, as usual, provided the activities of the position did not change for the period the substitute worked. If the activities differed, the substitute must sign a time and effort report. The best practice is to obtain required time and effort signatures from substitutes within 30 days of month end.

- If substitutes are paid from a non-federally funded pool, no time and effort is required for the substitute.
- It is recommended to confirm substitute pay is correct each month.
- Records retention - Keep all supporting time and effort documentation in the federal program department files per records retention policies and procedures. Click [here](#) for state records retention information. Search for “Grants Management”.
- The Business Office will conduct random audits of time and effort.

Schoolwide Plans:

Per OSPI Bulletin 039-24, a schoolwide program is a single cost objective. “Building employees who work solely on activities and fund sources specifically listed in the building’s schoolwide plan, may be charged to the schoolwide program as a single cost objective. In lieu of collecting individual staff certification, the building principal may prepare and sign group certifications that list all staff who worked solely on the schoolwide program for the period of the certification.” See OSPI’s Time and Effort Reporting [Frequently Asked Questions](#) for a current list of funds that can be combined in a schoolwide program.

In alignment with bulletin 039-24, Auburn School District has determined that all semi-annual certifications can be treated as schoolwide programs for time and effort certification. If the federal program chooses to do so, they may utilize group certifications as described above.

Changes to Salary Distributions:

On the fifteenth working day of *each month*, please run a transaction report for the previous month and review the report to ensure all charges including MSOCs (Materials, Supplies, and Operating Costs) are coded correctly. The Qmlativ “Transaction Recap Qmlativ Produced Data – WSIPC (ASD) or the Transaction Recap Qmlativ Produced Data – Account Code” report or the Qmlativ “Transaction Recap w/Pay Type Code” are recommended for this task. Submit all salary distribution changes and journal entries by the end of the month. Due to year-end reporting requirements, all changes for August should be posted by September 30.

If payroll expenditures coded to one account code need to be moved to a different account code, please request corrections as follows:

- Changes from now going forward (expended full grant, need to charge remaining payroll elsewhere):
 - Contact Human Resources.
- Changes for the full year (September through August):
 - Contact Human Resources and Payroll (via email).
- Changes up until now – past payments only (extra hours and/or substitutes):
 - Contact Payroll via email.

Remember to obtain updated time and effort certifications.

If an employee’s assignment is moved into a federal program after March 1, effective prior to March 1, create a Semi-annual certification document for the employee and obtain required signatures. Keep the original signed time and effort forms as they document that time and effort signatures were obtained timely.

Payroll's goal is to process all requests within 10 days of the date the request is received by the payroll department. Payroll's cutoff for posting back to the prior month is the fourth working day of the new month which helps grant claims and financial reporting be as accurate as possible.

Payroll will email the requesting department once the payroll adjustment has been posted. Run new year- to-date reports to confirm the results are as expected.

Separation from Auburn School District:

When an employee leaves the district, make sure to obtain their time and effort signatures on their last working day before they leave.

Year End:

The District's fiscal year runs from September 1 through August 31. Any needed corrections should be posted by October 5. Reviewing reports monthly will help make the year-end review and closing of the books more accurate. At year-end, review all transactions for the full year to ensure the charges are correct and that time and effort is complete and accurate.

OSPI Bulletin No. 039-24 Documentation Standards:

Per 039-24, "...LEAs must document their time and effort system (policies and procedures), including how they will meet each of the requirements (*shown in italics*), and implement internal controls to ensure the policy is followed." The total compensation for individual employees:

- (1) Is reasonable for the services rendered and conforms to the established written policy of the non-Federal entity consistently applied to both Federal and non-Federal activities;
 - a. *Salary schedules are set by the Human Resources department. The same salary schedules are used for employees paid from federal funds and non-federal funds.*
- (2) Follows an appointment made in accordance with a non-Federal entity's laws and/or rules or written policies and meets the requirements of Federal statute, where applicable;
 - a. *Auburn School District follows its policies and procedures for hiring staff.*
- (3) Is determined and supported as provided in paragraph (i) of this section, when applicable...
 - a. *Please refer to the next section.*

The guidance in CFR 200.430(i)(1) states in part: "Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- (i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
 - a. *Timesheet pay and associated charges for additional hours are authorized through the District's Pay Authorization Request (PAR) process prior to work being performed. PARs are prepared by office managers or program staff and routed electronically for approval by the appropriate supervisor, budget administrator, and program administrator to ensure the work to be performed, funding source, pay rate, and estimated hours are approved in advance.*
 - b. *After the work is completed, office managers compile reported hours and prepare an electronic timesheet upload report for payroll processing. The upload report is attached to the previously approved PAR and submitted to the Payroll Department.*

- (ii) *Payroll reviews the upload report and reconciles it to the approved PAR to verify that the employees, pay rates, funding sources, and reported hours correspond to the prior authorization before payment is processed. Any discrepancies are returned to the submitting department for correction prior to payment. Be incorporated into the official records of the non-Federal entity;*
 - a. *Payroll is processed through the District’s fiscal software, Qmlativ. As a result, all transactions are recorded in Qmlativ.*
- (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities (for IHE, this per the IHE's definition of IBS);
 - a. *Employees report extra hours either electronically through Qmlativ Time Tracking or by submitting hours worked to their building office manager or supervisor, depending on the type of work performed and the method used at the worksite. Office managers compile the reported hours and prepare an electronic upload report used to submit the hours for payroll processing. These hours must correspond to work that was previously authorized through the District’s Pay Authorization Request (PAR) process.*
 - i. *Time Tracking entries are reviewed and approved electronically by the supervisor or their designee prior to submission for payroll processing to ensure that time reported is accurate and appropriate.*
 - ii. *For extra hours reported outside of Time Tracking, office managers prepare the upload report and submit it with the approved PAR documentation to the Payroll Department for review and processing.*
 - iii. *Some Pay Authorization Requests (PARs) authorize a bank of hours for one or more employees to be used over a defined period of time (commonly referred to as “Group PARs”). In these cases, multiple upload reports may be submitted periodically against the approved PAR. Office managers or program staff are responsible for monitoring cumulative hours used against the authorized amount to ensure that the total hours submitted do not exceed the approved PAR authorization.*
 - iv. *Payroll reviews each upload report to verify that the employees, pay rates, funding sources, and reported hours correspond to the approved PAR. Payroll does not maintain cumulative tracking of hours used against Group PAR authorizations and relies on site or program level monitoring to ensure that hours remain within the approved authorization.*
 - v.
 - b. *v. Payroll’s review is limited to verification of payroll data against approved authorization and supporting documentation. Operational oversight of employee work assignments, supervision of hours worked, and monitoring of cumulative hours authorized under PARs remain the responsibility of the supervising department or program administrator. Paper timesheets are reviewed by Office Managers and entered on an electronic timesheet, which is reviewed for accuracy by principals and Program Managers prior to submission to the payroll department for final review prior to payment.*
- (iv) Encompass 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;

- a. Refer to section i, subsection iv above.*
- (v) Comply with the established accounting policies and practices of the non-Federal entity (See paragraph (i)(1)(ii) above for treatment of incidental work for IHEs.); and
 - a. Auburn School District follows its established accounting policies and practices.*
- (vi) [Reserved]
- (vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and 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.”
 - a. Salaries and wages are distributed to cost accounts based on the proportion of work performed in a given activity. When an employee’s work is associated with more than one activity, the wages are distributed proportionally. Distributions are established on annual assignments in Qmlativ Position-Assignment and on paper or electronic timesheets for extra hours.*

Per 039-24, “Also, in CFR 200.430(i)(3) it states: “In accordance with Department of Labor regulations implementing the Fair Labor Standards Act (FLSA) (29 CFR part 516), charges for the salaries and wages of nonexempt employees, in addition to the supporting documentation described in this section, must also be supported by records indicating the total number of hours worked each day.””

- A. Annual assignments created in Human Resources and paid monthly document the total number of hours worked each day on each assignment. Timesheets and timesheet upload reports document the total number of extra hours worked each day.*

References:

Click [here](#) for Auburn School District Policy [6100](#) Revenues From Local, State, and Federal Sources

Click [here](#) for information about Auburn School District’s Time & Effort processes