

Monthly Certification of Time-and-Effort Reporting

Individuals paid out of a federal grant award in full or partially, or out of matching funds to that award, must report their time and effort to the responsible funding agency. An employee will complete either a semi-annual or monthly time and effort report, based upon their assigned activities. A “cost objective” is a function, organizational subdivision, contract, grant, or other activity for which cost data are needed and for which costs are incurred. If an employee works on multiple activities or “cost objectives,” a distribution of the employee’s salary and wages must be supported by a Personnel Activity Report (PAR) or equivalent documentation. If an employee is solely paid out of non-federal funds but works on adult education and literacy activities, that employee should submit the monthly reporting form. These certifications must meet the following:

- Be prepared and submitted monthly
- Account for the total activity for which each employee is compensated from federal and non-federal funding sources
- Be signed by both the employee and supervisory official having firsthand knowledge of the work performed by the employee
- Be submitted by the 15th working day of the month to report the activities completed the previous month

If an employee works on multiple activities or “cost objectives,” a distribution of the employee’s salary and wages must be supported by a Personnel Activity Report (PAR) or equivalent documentation. A PAR is required if an employee works on:

- More than one Federal award
- A Federal award and a non-federal funds
- Two or more activities paid for out of one or more federal grant awards

Suitable documentation to support the PAR can be a weekly schedule, contract, or time sheet used for budgeting, salary, and wage payments. This supporting documentation is kept by the provider and must be available upon request.

For short-term work that is charged to a grant, such as short-term substitute teachers, substitute paraprofessionals, extended contract time, etc., the approved time sheet or similar type of documentation would suffice as appropriate time and effort reporting. The monthly reporting form furnished by the System Office should not be submitted by short-term employees. All supervisory staff should keep timesheets and other suitable documentation on file locally for backup in these cases.

If payroll processed is based on a budgeted or estimated time and activities, then the records must be compared to the submitted time-and-effort reports quarterly. If the difference is 10% or more, payroll charges must be adjusted at the time of the records comparison. The following quarter's estimates must be adjusted to more closely reflect the actual activity. The review process is intended to reconcile time and effort with payroll.

If the anticipated time and effort is less than 10% different from the actual time and effort, an accounting adjustment is not required until the end of the program year. All time and effort reporting discrepancies are to be reconciled at the end of the program year. Reconciled discrepancies should be reflected in the final report submitted to the System Office at the end of the program year.

All time and effort reports will be submitted via the Learning Management System (LMS) Moodle. Each quarter, random verification of time and effort reporting compliance will be conducted. Failure to be in compliance regarding time and effort reporting will be addressed in a corrective action plan. All providers will receive a reporting schedule for the proposed time and effort submission dates.

References

Education Department General Administrative Regulations (EDGAR) Sources:

EDGAR-200.430 (i)

EDGAR-200.430 (i) (1)

EDGAR 200.430 (i) (4)

Brustein, M., & Manasevit, L. (2015). The Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards. In *The administrator's handbook on EDGAR* (3rd ed., pp. 141-142). Washington, DC: BrandyLane Publishers, Inc., Brustein and Manasevit, PLLC.

Brustein, M., & Manasevit, L. (2015). Actions to ease the Burden of Time-and-Effort Reporting. In *The Administrator's Handbook on EDGAR* (3rd ed., p. 237). Washington, DC: BrandyLane Publishers, Inc., Brustein and Manasevit, PLLC.