

SESSION OBJECTIVES

- Review federal guidance for personal compensation
- Identify common pitfalls related to federal grant personnel costs
- Discuss documentation of time and effort
- Look at an example personnel activity report
- Answer participant questions

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WHY IT MATTERS...

2023

• \$8,879,367 in Personnel Costs Budgeted

51% of Perkins

• Estimated ~70% federal grant funds

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WHAT IS A PERSONNEL COST?

Personnel

- Stipends
- Tutors/Interpreters/ Hourly Employees
- Faculty/Instructors/WBL Coordinators/ Simulation Center Staff
- Direct administrative charges for grant management for personnel working on grant
- Employee reviewing/making curriculum updates
- Employee delivering training
- Substitutes

Not Personnel

- Contracts with firms or individuals who are not paid as employees for any work by the organization
- Travel costs incurred by an employee
- Memberships or registrations

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WHEN IS TIME & EFFORT REPORTING REQUIRED?

Anytime an employee is paid in whole (easy) or in part (harder) with federal dollars

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Personal Compensation 2 CFR § 200.430

- Compensation Costs Allowable if:
 - Costs support Perkins Act objectives (Section 135)
 - · Costs are reasonable for services rendered & follow policy
 - Costs are consistently applied (federal or non-federal pay is same)
 - Personnel appointment is made according to internal policies
 - Costs are documented

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BUT S/HE ONLY WORKS ON CTE...

- Documentation must support the distribution of the employee's salary or wages 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.

So basically everyone...

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STANDARDS OF DOCUMENTATION 2 CFR § 200.430(I)

"Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed."

Note: Work PERFORMED; not work planned



TIME & EFFORT REPORTING 2 CFR § 200.430

- Personnel Activity Report (PAR in guidance)
 - Required if employee works on multiple activities or cost objectives
 - PAR must:
 - Reflect after-the-fact distribution of time (i.e. timesheet)
 - o Account for TOTAL activity for which employee was paid
 - Be prepared monthly (minimum) AND coincide with pay periods
 - Be signed by employee
 - Recommend signed by supervisor for internal control purposes

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COST OBJECTIVE

- What is a Cost Objective? (9/2012 ED DCL)
 - "Function, organizational subdivision, contract, grant, or other activity for which cost data are needed and for which costs are incurred"



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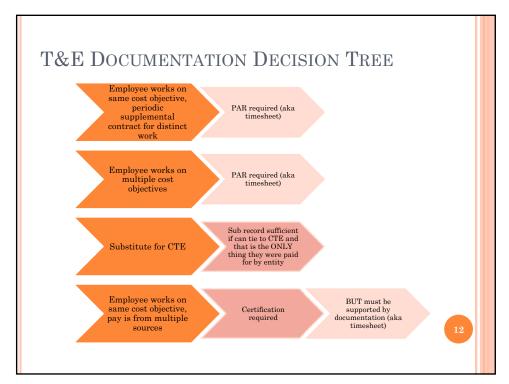
T & E (CONTINUED)

- 9/2012 ED Dear Colleague Letter permits a substitute system for documenting time and effort IF employee works on a consistent schedule on the same (single or multiple) cost objectives.
 - Semiannual certification required
 - Signed by employee
 - Signed by supervisor
 - Significant deviations must be documented using a PAR (timesheet)

In audit, the semiannual certification would need to be supported by something (schedules, contracts, sign-in sheets)!

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T & E FOR TUTORS (ADMIN HANDBOOK)

Must be for CTE students ONLY

Individual or Group

- Individual: must demonstrate that each hour was with a CTE student
- Group tutoring: At least one student must be CTE

Documentation must

- · Match hours worked to students served
- Confirm that students meet CTE student definition
- · Match Perkins payroll costs

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TUTORING (CONT.)

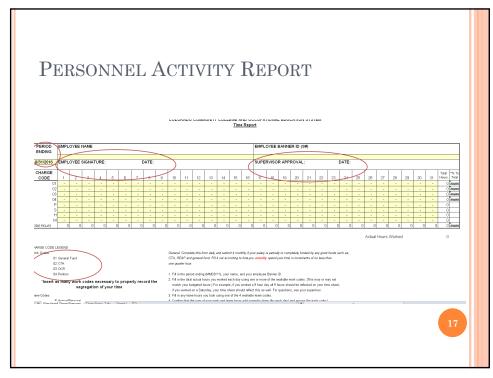
- Postsecondary CTE student
 - Postsecondary student enrolled in 6+ CTE credits in the semester they receive tutoring
 - Postsecondary student with a declared CTE major/minor
 - Postsecondary student, who, in the term they receive tutoring is enrolled in 50%+ CTE courses
- Secondary CTE student
 - Any student enrolled in a CTE course



COMMON PITFALLS (PERKINS SPECIFIC)

- Not including personnel costs in the grant application
- Not tracking time and effort as required
 - Not tracking 100% of time
 - Not documenting time
 - Not tracking CTE related work/students (in this context)
- Paying employees based on budget estimates
- Not understanding allowable activities & costs

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HOW THE PROCESS IDEALLY WORKS

- Documented procedure for entire organization that applies to all grant funded employees
- HR & Finance teams can identify which personnel are grant funded
- Grant Manager signed off on person being hired PRIOR to hiring
- Employee notified they are grant funded and provided training on documenting time and effort
- Timesheets completed with each pay period
 Signed by employee AND supervisor
- Finance does reconciliation of budget to actual AND Grant Manager sees this for budgeting and grant management purposes

Personnel Costs are obligated at the time the employee performs the work $% \left\{ \mathbf{r}_{i}^{\mathbf{r}_{i}}\right\}$

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