

Fiscal Considerations for Title I Funded Programs

Texas Education Agency
Division of Financial Audits
Grant Audits Section

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Before We Begin

You should have

- ✧ PowerPoint Handout
- ✧ Sample – Periodic Certification
- ✧ Sample – Personnel Activity Report (2)
- ✧ Professional Development Evaluation Form

On the Agenda

- ◆ Allowable Activities
 - ✧ Campus Improvement Plans
 - ✧ Comprehensive Needs Assessment
- ◆ Schoolwide Programs
 - ✧ Statutory Authority
 - ✧ Federal Programs That May Participate
 - ✧ Effect of Consolidation
 - ✧ Applicability of Federal Fiscal Requirements
 - ✧ Funding
 - ✧ Accounting
 - ✧ Benefits
- ◆ Federal Fiscal Requirements
- ◆ Time and Effort

Safe Harbor

- ◆ You have now entered the no audit zone
 - ◇ You may
 - » Talk about your specific circumstances without fear of being targeted for an audit
 - » Ask any question related to today's topic
 - ◇ The goal is to provide useful information that will improve subrecipient compliance

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Course Objective

Upon completion of this course, participants will have an understanding of the fiscal and fiscally-related requirements that apply to Title I schoolwide campuses.

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About the Presenter

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About the Presenter

- ◆ Conduct and direct
 - ✧ Audits, investigations, reviews and other monitoring activities
 - ✧ ISD, OECS, RESC, universities, nonprofits
 - ✧ Administration of state and federal formula and discretionary grants
- ◆ Assist law enforcement agencies

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About the Presenter

- ◆ Conduct presentations
- ◆ Develop rules and guidance
- ◆ Respond to inquiries
 - ✧ Fiscal, programmatic and other requirements
 - ✧ State and federal programs
- ◆ Testify in hearings

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About the Presenter

- ◆ Supervise and conduct
 - ◇ Audits, investigations, reviews and other monitoring activities
 - » ISD, OECS, RESC, universities, nonprofits
 - » State and federal discretionary grants
 - » IDEA formula grants
- ◆ Respond to inquiries regarding fiscal, programmatic and other requirements pertaining to state and federal grants

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Purpose of Title I

- ◆ Public Law 107-110, Sec. 1001
 - ◇ The purpose of this title is to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging State academic achievement standards and state academic assessments.

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Allowable Activities

- ◆ Agency auditors consider
 - ◇ Statutory purpose
 - ◇ Specific requirements
 - » Law or rule
 - » Non-regulatory guidance
 - ◇ Grant RFA and instructions
 - ◇ Appendices and handbooks
 - ◇ Approved grant application

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Allowable Activities

- ◆ Allowable activities depend on the type of grant program
 - ◇ Formula grants
 - » Applications tend to be broad
 - › Reliance on checklists
 - Not informative or descriptive
 - » Refer to
 - › Statute and rules
 - › Guidelines, appendices
 - › Provisions and assurances

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Allowable Activities

- ◇ Discretionary grants
 - » Applications tend to be specific
 - › Detailed narrative descriptions
 - Grantee specifies program activities
 - » Specific requirements included in
 - › RFA
 - › Provisions and assurances

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Allowable Activities

- ◆ Some allowed activities are easy to discern
 - ◇ Statutory requirements
 - » Generally, across all NCLB programs
 - › Allowable activities
 - Parental involvement
 - Private/Nonprofit school participation
 - Professional development

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Allowable Activities

- ◆ Other activities are dependent on LEA DIP/CIP
 - ✧ To be allowable activities, plans must adhere to statutory requirements and rules
 - » Should consider non-regulatory guidance
 - › Designing Schoolwide Programs
 - ✧ Failure to include all required components means activity is not allowable

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Allowable Activities

- ◆ Why is an activity not allowable if DIP/CIP does not conform to requirements?
 - ✧ Missing data elements do not provide complete context to activities
 - » Comprehensive needs assessment
 - » Scientifically based research
 - » Description of how resources will be used
 - » List of programs consolidated

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Allowable Activities

- ◆ Comprehensive needs assessment
 - ✧ To be allowable, activity must be directly linked to an identified need
 - ✧ Should be supported by documentation demonstrating how it was conducted
 - » Focus groups
 - » Data disaggregation and analysis
 - » Surveys

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Allowable Activities

- ◆ Other activities are dependent on program structure
 - ◇ Schoolwide programs
 - » Depends on how program is funded
 - › TIPPA funds only, consolidated federal funds
 - Limited to upgrade of educational program
 - › Full consolidation
 - Consolidated funds may be used for any campus function or activity

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Allowable Activities

- ◆ General rule followed by TEA auditors
 - ◇ If activity pertains to classroom instruction, activity is generally allowable
 - » Has to address improvement in student performance
 - » Benefit students
 - » Link to statutory purpose

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Allowable Activities

- ◆ What auditors have observed that is unallowable?
 - ◇ Award banquets
 - ◇ Equipment and supplies used to support regular education program
 - ◇ Field trips to recreational parks and having no clear instructional purpose
 - ◇ Personnel costs for time expended on unrelated work
 - ◇ Promotion of school events
 - ◇ Staff luncheons
 - ◇ Student social events

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Campus Improvement Plans

- ◆ CIPs provide context for expenditures
 - ◇ How does expenditure help students learn?
 - ◇ Identify
 - » Goals
 - » Strategies
 - » Activities
 - ◇ To hold true, must meet plan requirements
 - » TEC 11.251, P.L. 107-110
 - » Failure to meet legal requirements
 - › Expenditures do not have complete context
 - › May not be able to justify use of funds

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Campus Improvement Plans

- ◆ P.L. 107-110, Sec. 1114(b)(2)
 - ◇ Required to have a comprehensive plan for reforming the total instructional program in the school
 - » Describes how the school will implement the components of a schoolwide program
 - » Describes how the school will use Title I resources and other sources to implement the components

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Campus Improvement Plans

- » Lists SEA and LEA programs and other Federal programs that will be consolidated in the schoolwide program
- » Describes how the school will provide individual student academic assessment results in a language the parents can understand, including an interpretation of those results, to the parents of a child who participates in the academic assessments required by Sec. 1111(b)(3)

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Campus Improvement Plans

- ◆ Basic questions that CIP must answer
 - ✧ Does the program, activity, or strategy address a need previously identified in the comprehensive needs assessment?
 - ✧ Is the program, activity, or strategy reasonable and necessary to carry out the intent and purpose of the program?

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Campus Improvement Plans

- ◆ Basic questions that CIP must answer
 - ✧ Is the program, activity, or strategy to be funded adequately described?
 - ✧ How will the program, activity, or strategy be evaluated?

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Comprehensive Needs Assessment

- ◆ Designing Schoolwide Programs, Non-Regulatory Guidance
 - ✧ The needs assessment is critical to developing a schoolwide program, as it reveals the priority areas on which the program will focus. The needs assessment guides the development of the comprehensive schoolwide plan and suggests benchmarks for its evaluation, and, as such, is closely linked to all aspects of schoolwide program implementation.

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Comprehensive Needs Assessment

- ◆ Critical component
 - ◇ Perhaps most important aspect of plan
 - ◇ Provides basis for goals, strategies, activities
 - ◇ Describes what you are trying to address
 - » Decline in attendance
 - » Increase in drop out rate
 - » Drop in passing rate for Algebra
 - » Disparity between student groups

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Comprehensive Needs Assessment

- ◆ Data representing entire campus
- ◆ Not just TAKS scores
 - ◇ Student needs
 - ◇ Curriculum and instruction
 - ◇ Professional development
 - ◇ Family and community involvement
 - ◇ School context and organization

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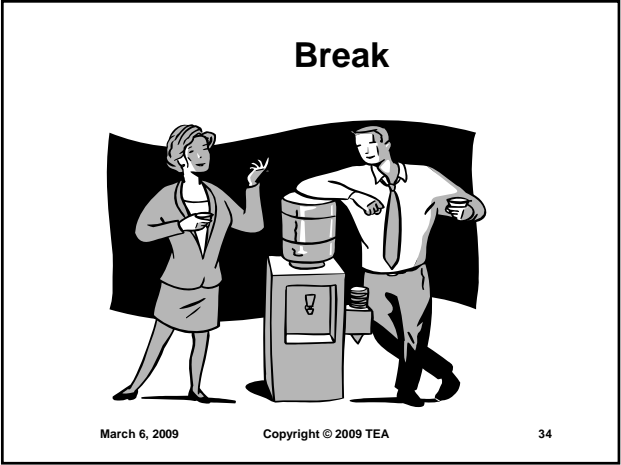
Comprehensive Needs Assessment

- ◆ Use data from the needs assessment to develop a comprehensive plan
- ◆ Detailed comprehensive needs assessment required to be conducted in initial planning year, revised and updated in annual review process

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Schoolwide Programs

- ◆ Statutory purpose
 - ◇ P.L. 107-110, Sec. 1001
 - » The purpose of this title is to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging State academic achievement standards and state academic assessments.

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Schoolwide Programs

- ◆ Statutory authority
 - ◇ P.L. 107-110, Sec. 1114(a)(1)
 - » A local educational agency may consolidate and use funds under this part, together with other Federal, State, and local funds, in order to upgrade the entire educational program of a school

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Schoolwide Programs

- ◆ Statutory authority
 - ◇ Encouraged to consolidate
 - » P.L. 107-110, Sec. 1111(c)(9), 34 CFR 200.29(e)(1)
 - › Each State must encourage schools to consolidate funds from other Federal, State, and local sources in their schoolwide programs
 - ◇ Consolidation must make sense to LEA

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Schoolwide Programs

- ◆ Statutory authority
 - ◇ P.L. 107-110, Sec. 1114(a)(3)(C)
 - » A school that consolidates and uses funds from different Federal programs under this section shall not be required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those particular funds as long as the school maintains records that demonstrate that the schoolwide program, considered as a whole, addresses the intent and purposes of each of the Federal programs that were consolidated to support the schoolwide program

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Schoolwide Programs

- ◆ Statutory authority
 - ◇ P.L. 107-110, Sec. 1114(a)(3)(A), 34 CFR 200.29(b)(1)
 - » A school that consolidates and uses federal funds in a schoolwide program is not required to meet the statutory or regulatory requirements of that program applicable at the school level

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Schoolwide Programs

- ◆ Statutory authority
 - ◇ Still required to meet the intent and purposes of the programs consolidated into a schoolwide program to ensure that the needs of the intended beneficiaries of that program are addressed

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Schoolwide Programs

- ◆ Statutory authority
 - ◇ What does this mean?
 - » Provided that statutory purpose of federal programs is addressed, LEA is not required to demonstrate that expenditures from consolidated federal funds were used to meet specific program requirements

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What Federal Programs Can Be Consolidated?

- ◆ Title I, Part A
- ◆ Other federal programs under the Secretary of Education
 - ◇ Not Reading First
- ◆ Limitations on IDEA

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What Federal Programs Can Be Consolidated?

- ◆ Migrant
 - ◇ Yes by statute
 - » Must meet all needs of migrant students first
 - › Texas' Consolidated State Application outlines the specific needs that must be met prior to consolidating Migrant
 - OME states it cannot be done
 - TEA must pre-approve consolidation of Migrant funds

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Effect of Consolidation on State Requirements

- ◆ Federal law and rule do not apply to state mandated and funded programs
- ◆ LEA must still address the intent, purpose and specific requirements of state funded programs

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Effect of Consolidation on State Requirements

- ◆ May consolidate state funds with federal funds provided that State mandates are addressed in consolidated program
 - ◇ State Compensatory Education
 - » What supplemental programs and services is the LEA providing to eliminate any
 - › Disparity in performance on assessment instruments
 - › Disparity in the rates of high school completion between students at-risk of dropping out of school and all other students

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Applicability of Federal Fiscal Requirements

- ◆ LEA must meet requirements for
 - ◇ Maintenance of effort
 - ◇ Comparability of services
 - ◇ Use of funds to supplement, not supplant

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Applicability of Federal Fiscal Requirements

- ◆ P.L. 107-110, Sec. 1114(a)
 - ◇ Does not waive or limit applicability of federal fiscal requirements
 - ◇ If LEA consolidates local and state funds with federal funds, then use of funds is not required to be tracked separately, uniquely
 - » If properly implemented, local, state and federal funds are effectively commingled
 - › This means that federal fiscal requirements now apply to commingled funds
 - This includes the local and state funds commingled with federal funds

Funding of Schoolwide Programs

- ◆ Three means by which to fund schoolwide programs
 - ◇ Title I, Part A funds only
 - ◇ Consolidation of federal funds
 - ◇ Full Consolidation

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Funding of Schoolwide Programs

- ◆ Title I, Part A only
 - ✧ LEA only uses TIPA funds to support the campus SWP
 - ✧ Expenditures for only educational (i.e., instructional) costs on the campus are allowable from the SWP budget
 - ✧ LEA must track Title I, Part A funds to allowable Title I activity

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Funding of Schoolwide Programs

- ◆ Consolidation of federal funds
 - ✧ LEA uses federal funds to implement the campus SWP
 - ✧ Expenditures for only educational (i.e., instructional) costs on the campus are allowable from the SWP budget

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Funding of Schoolwide Programs

- ◆ Consolidation of federal, state, and local funds
 - ✧ LEA uses federal, state and local funds to implement the campus SWP
 - ✧ Allowable expenditures include any cost on the campus that
 - » Are stated in the CIP
 - » Meet a need identified in the campus' CNA

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Funding of Schoolwide Programs

- ◆ SWP budget must agree to financial and other resources identified in campus CIP

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Accounting for Schoolwide Programs

- ◆ Appendix 9, Use of Funds for Title I, Part A Schoolwide Programs
 - ◇ Option 1
 - » LEA may choose to have a campus account for all expenditures by the special revenue fund code for each federal program as the LEA would on a targeted-assistance campus
 - › Use local option code to identify SWP expenditures

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Accounting for Schoolwide Programs

- ◆ Option 2
 - ◇ LEA may choose to transfer federal program funds to a schoolwide campus budget through a system of locally defined federally funded special revenue fund codes
 - » For instance
 - › Fund 211 >>> Fund 280
 - › Fund 204 >>> Fund 281
 - › Fund 262 >>> Fund 282

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Accounting for Schoolwide Programs

- ◆ Option 3
 - ◇ LEA may choose to have a campus include all federal funds that are eligible to be combined in a schoolwide campus budget in a single, locally defined federally funded special revenue fund code
 - » Do not need to account for uses of funds by fund during fiscal year
 - » No allocation methodology needed

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Accounting for Schoolwide Programs

- ◆ Options 1 and 2
 - ◇ Use a proportional allocation methodology to charge costs to program fund sources
- ◆ Options 2 and 3
 - ◇ SWP budget accounted for in locally defined fund codes
 - ◇ Need to reclassify expenditures to originating fund code

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Accounting for Schoolwide Programs

- ◆ Proportional allocation methodology

Originating Fund	Budgeted Costs	Percent of Total Budget	Payroll Costs	Supplies and Materials Costs	Other Operating Costs	Capital Outlay Costs	Total Costs Charged to Fund 289
204	\$ 10,000	7%	\$ 7,088	\$ 1,050	\$ 1,838	\$ 525	\$ 10,500
211	\$ 100,000	67%	\$ 67,838	\$ 10,050	\$ 17,588	\$ 5,025	\$ 100,500
262	\$ 15,000	10%	\$ 10,125	\$ 1,500	\$ 2,625	\$ 750	\$ 15,000
263	\$ 5,000	3%	\$ 3,038	\$ 450	\$ 788	\$ 225	\$ 4,500
265	\$ 20,000	13%	\$ 13,163	\$ 1,950	\$ 3,413	\$ 975	\$ 19,500
	\$ 150,000	100%	\$ 101,250	\$ 15,000	\$ 26,250	\$ 7,500	\$ 150,000

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Accounting for Schoolwide Programs

- ◆ Maintenance of effort
 - ◇ LEA must still consider potential impact
 - ◇ Maintain records to demonstrate compliance
- ◆ PEIMS
 - ◇ Must still report expenditures by fund code
- ◆ Records
 - ◇ If CIP adequate, records need only refer to SWP
 - » Refer to specific strategy, activity

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Accounting for Schoolwide Programs

- ◆ How is accounting simplified?
 - ◇ May account for expenditures proportionally
 - » Do not have to attribute specific expenditures to specific program requirements
 - » May account for expenditures in a single, locally defined federal fund code
 - › Reclass expenditures to specific fund code 199 and applicable federal fund codes

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Benefits of Consolidation

- ◆ Planning is simplified
 - ◇ Develop goals, strategies and activities that address comprehensive needs
 - ◇ Focus on upgrading entire educational program

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Benefits of Consolidation

- ◆ Program implementation is simplified
 - ◇ Only need to focus on federal statutory purpose
 - ◇ Do not need to worry about specific federal program requirements

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Benefits of Consolidation

- ◆ Accounting is simplified
 - ◇ Do not need to account for uses of funds by fund
- ◆ Fiscal flexibility
 - ◇ Provided that funds meet student needs, LEA may use consolidated funds for any allowable cost

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Non-Regulatory Guidance

- ◆ If all the LEA's TIPA schools operate SWPs, may the LEA consolidate funds it is required to reserve under TIPA and other Federal programs into one district-wide pool?
 - ◇ No
 - » Consolidation and SW are only at campus-level
 - ◇ LEA still must meet required set-asides for homeless, neglected, parent involvement, etc.

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Non-Regulatory Guidance

- ◆ If a school operating a SWP does not consolidate its TIPA funds with other federal, state, and local funds, what activities may TIPA funds support?
 - ◇ Only educational needs of campus identified by needs assessment and articulated in plan
 - ◇ All enrolled students are eligible for services, consistent with plan
 - ◇ Services/activities do not need to be supplemental

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Non-Regulatory Guidance

- ◆ May TIPA funds at SW campus be used for basic operational expenses such as building maintenance and repairs, landscaping, and custodial services?
 - ◇ No if using TIPA funds only
 - ◇ No if using only federal funds
 - ◇ Yes if using local, state and federal funds
 - » Demonstrate that supplanting has not occurred

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Break



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Federal Fiscal Requirements

- ◆ Legal Structure
 - ◇ Statutes
 - ◇ Program Statutes
 - » NCLB P.L. 107-110
 - » IDEA P.L. 108-446
 - ◇ Regulations
 - » Uniform Administrative Requirements For Grants and Cooperative Agreements to State and Local Governments (34 CFR 80)
 - » OMB Circular A-87 (Cost Principles for State, Local, and Indian Tribal Governments)
 - ◇ Guidance
 - » Non-regulatory Guidance
 - » Application Guidance

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Federal Fiscal Requirements

Legal Structure

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graph TD
    A[Program Statute] --> B[Regulations]
    B --> C[Guidance]
    B --> D[34 CFR (EDGAR)]
    B --> E[OMB Circular A-87]
  
```

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Questions to Consider

- ◆ Does the activity meet the intent and the objectives of the enabling legislation?
 - ◇ Intent and Purpose
 - ◇ Intended Program Beneficiaries

http://maverick.tea.state.tx.us:8080/Guidelines/NCLB/NCLBAA09/NCLBAA09PP1100_G.pdf

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Questions to Consider

- ◆ Does the program, activity or strategy address a need previously identified in the campus comprehensive needs assessment?
 - ◇ The needs assessment is critical as it reveals the priority areas on which the program will focus.
 - ◇ Provides basis for goals, strategies, and activities
 - ◇ Driving force of program
 - ◇ Guides program

http://198.214.97.41:8080/Guidelines/NCLB/NCLBA09/NCLBAA09CS7000_X.pdf

Questions to Consider

- ◆ Is the cost allowable as per the OMB Circular A-87 cost principles?
 - ◇ Costs must be allocable to a particular grant award in accordance with relative benefits received.
 - » Be incurred specifically for the grant.
 - » Benefit the grant.
 - » Be distributed in reasonable proportion to the benefits received.

Questions to Consider

- ◇ Costs must be reasonable and necessary for operations of the program.
 - » Reasonable costs are consistent with prudent business practice and comparable to current market value.
 - » Necessary costs essential to accomplishing the objectives of the project.
 - » Must be allowable expenditures under the authorizing program statutes, regulations, and rules.

http://maverick.tea.state.tx.us:8080/Guidelines/Reference%20Materials/705XXXPP1000_G.pdf

Questions to Consider

- ◆ Is the expense supporting an activity/cost approved in the application?
 - ◇ Number of Approved Positions
 - ◇ Professional and Contracted Services
 - ◇ Capital Outlay
 - ◇ Budget Amendments

http://maverick.tea.state.tx.us:8080/Guidelines/NCLB/NCLBAA09/NCLBAA09PP2000_1.pdf

Questions to Consider

- ◆ Did you encumber, obligate and expend funds between the beginning date and ending date listed in the Notice of Grant Award?
 - ◇ An obligation occurred depending upon the expenditure as follows:

Expenditure Type	Date of Obligation
Acquisition of Property	Date of binding written commitment
Personal Services by Employee	When services are performed
Personal Services by Contractor	Date of binding written commitment
Travel	When travel is taken
Utility Services	When the services are received.
Rental or lease of property	When the property is actually used or occupied.

Questions to Consider

- ◆ Obligation of funds (cont.)
 - ◇ All services must be rendered between the beginning and ending dates of the grant.
 - ◇ All materials and equipment must be delivered before the ending date of the grant and must be ordered and delivered in time to substantially benefit the current grant period and in no case after the ending date of the grant.
 - ◇ All travel must occur by the ending date of the grant.
 - ◇ Pre-award Costs (only if approved)

http://maverick.tea.state.tx.us:8080/Guidelines/Reference%20Materials/705XXXXPP1000_G.pdf

What is Time and Effort (T&E)?

Federal law requires all employees paid with federal funds document the time and effort they spend within the program.

- ◆ In other words...
- ◆ Document should reflect the **actual** time spent by the employee on activities of the federal program(s) being charged.
- ◆ Document should account for **all** of the employee's time for the period covered.



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How do I know whether or not I should prepare T&E Reports?

- ◆ Time and Effort reports should be prepared by any employee with salary/wages that are charged:
 - ◇ Directly to a federal award
 - ◇ Directly to multiple federal awards
 - ◇ Directly to any combination of a federal award and other federal, state, or local fund sources

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What determines whether an employee reports monthly or semi-annually?

- ◆ Employees expected to work solely on a single federal award or cost objective will support their salary or wages by a **periodic certifications** (at least semi-annually).
- ◆ Employees that work on multiple activities or multiple cost objectives, will support their salaries or wages by a **personnel activity reports** (at least monthly).

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What must a periodic certification include?

Single federal award or cost objective

- ◆ Periodic Certifications must:
 - ◇ Identify the cost objective
 - ◇ Specify the reporting period covered.
 - ◇ Be signed and dated by the employee or a supervisor with first-hand knowledge of the work performed
 - ◇ Prepared at least semi-annually
 - ◇ Prepared after the work has been completed.
- ◆ Exemption Applies with Ed-Flex Waiver

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Exemption to Periodic Certification

Ed-Flex Waiver

- ◆ **Certification that an Employee is Funded from a Single Fund Source or Cost Objective**
- ◆ This **waiver eliminates the requirement** that charges for salaries and wages be **supported by a semi-annual certification** that the employee worked solely on that program for the period covered by the certification.
- ◆ This waiver is **allowable as long as** the employee's job description clearly states that the employee is assigned 100 percent to the program or single cost objective.

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What is a "Single Cost Objective"?

- ◆ A single cost objective is a single work activity that may be funded by one or more fund sources. Single cost objectives include:
 - ◇ A single federal grant award
 - ◇ A combination of federal Special Education and state Special Education Program funds

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What must a personnel activity report include?

Multiple activities or multiple cost objectives

- ◆ Personnel Activity Reports
 - ◇ Must account for the total activity for which each employee is compensated (i.e., all hours worked, not just the hours worked on a federal award).
 - ◇ Be prepared at least monthly and coincide with one or more pay periods.
 - ◇ Be signed by the employee.
 - ◇ Reflect an after-the-fact distribution of the actual work activity of each employee.

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What is a “Multiple Cost Objective?”

- ◆ More than one federal award.
- ◆ A Federal award or a non-Federal award.
- ◆ An indirect cost activity and a direct cost activity.

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Is T&E documentation required for staff working in a campus with a schoolwide program?

- ◆ Answer: Yes and No
 - ◇ **No**, time and effort documentation is not required for staff who are charged solely to federal/state/local funds that have been combined in a school wide program.
 - ◇ For any employee charged to combined funds in the schoolwide program may be documented as a single-cost objective, “Schoolwide Program,” with non-combined funds being recorded as separate cost objective(s).

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Is T&E documentation required for staff working in a campus with a schoolwide program? (cont.)

- ◆ **Yes**, for any employee(s), in whole or in part, to federal/state/local programs that have not been combined in a schoolwide program.

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Can administrators charge time to federal programs?

- ◆ Answer: Yes and No
 - ◇ **Yes:** Federal program directors can do so as long as they maintain monthly time and effort documentation supporting actual time charged to each federal and state program under their supervision.
 - ◇ **No:** School Administrators are considered general government cost and generally may not charge time to federal awards (pursuant to the supplement, not supplant provision).
 - » The only exception to this rule is when any such official has specific program administration or direct student duties and documents actual time spent in the performance of those duties by completing monthly time and effort records.

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Who are school administrators?

- ◆ Answer: School administrators are:
 - ◇ Superintendents
 - ◇ Assistant Superintendents
 - ◇ Principals
 - ◇ Assistant Principals
 - ◇ Support staff for those listed above.

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Are there common errors in time and effort reporting that I can avoid?

- ◆ Answer: Yes. Some examples are:
 - ◇ Failing to recognize that a change in position, duties, or funding may result in a change in time and effort reporting.
 - ◇ Failing to provide training to staff who are responsible for completing, approving, and/or reconciling time and effort documentation.
 - ◇ Reporting time according to the ratios budgeted without regards to how the individual actually worked.
 - ◇ Failing to adjust actual payroll charges based on reported time and effort when the difference is less than 10%. This 10% standard applies to adjustment for an annual expenditure adjustment to match time and effort.

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Are there common errors in time and effort reporting that I can avoid? (cont)

- ◆ Time and effort not reviewed and signed by appropriate staff.
- ◆ Entire day's schedule not accounted for (only federal time reported).
- ◆ Lack of appropriate time and effort records for employee(s) with supplemental contracts/stipends and extra hours.

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Are there common errors in time and effort reporting that I can avoid? (cont.)

- ◆ These problems can be costly to your district. They result in:
 - ◇ Inappropriate charges to federal programs.
 - ◇ Inaccurate management information for decision making.
 - ◇ Increased risk of audit findings/questioned costs.

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Scenerio #1

- ◆ An educational diagnostician providing only special education services 100 percent of the day is charged 100 percent to IDEA Part B
- ◆ Time and Effort Reporting Required: Periodic Certification

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Scenerio #2

- ◆ An educational diagnostician spends time providing special education services and is paid from IDEA Part B (35%) and the FSP Special Education Allotment (65%). This is reported as a single cost objective.
- ◆ Time and Effort Reporting Required: Period certification


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Scenerio #3

- ◆ Title I Part A, Title I Part C and Title III have combined into a Schoolwide Program. The Schoolwide Program is clearly identified in the CIP. Since the Schoolwide Program can be treated as a single cost objective, personnel providing services under the Schoolwide plan report time as a single cost objective.
- ◆ Time and Effort Reporting Required: None is required because Ed-Flex applies.

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Questions



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Survey Says

Please complete a professional development evaluation form.
Thank You.



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