### Notes: New Recommendation: Accept as written

### PURPOSE

This policy and its accompanying procedure establish school district requirements and guidelines for time and effort reporting and management of effort commitments for all federally-funded programs/projects.

Federal requirements provide that salaries and benefits charged to a federal award(s) must be based on appropriate documentation. Effort reporting is a required process by the federal government to verify that direct charges for salaries and benefits to federally sponsored programs are reasonable and reflect actual work performed. This requirement applies to all federal awards and sub-awards, including those received directly from the federal government, unless specifically exempted by the Office of Management and Budget (OMB).

### TIME AND EFFORT REPORTING REQUIREMENTS

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.

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..

Failure to verify time and effort within the certification period or improper allocation of employee's time according to contractual agreement can lead to breach of contractual agreement, loss of future awards, and adverse public image. Criminal charges may be brought against an individual who certifies a falsified report (Federal False Claims Act).

### • • • • • • • •

# LEGAL REFERENCE:

OMB A-21 Revised 05/10/04, Cost Principles for Educational Institutions http://www.whitehouse.gov/omb/circulars\_a021\_2004

OMB A-87 Revised, Cost Principles for State, Local, and Indian Tribal Governments <u>http://www.whitehouse.gov/omb/circulars\_a087\_2004/</u>

# ADOPTED:

# AMENDED: