

TIME DISTRIBUTION RECORDS FOR FEDERAL PROGRAMS

Sheridan County School District No. 2 shall keep records that accurately reflect the work performed for charges to Federal awards for certified staff salaries and wages. The records include annual certifications, semi-annual certifications and monthly personnel action reports dependent on the position of the employee. The records will:

- Provide a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- Ensure that records reasonably reflect the total activity for which the employee is compensated by the District, not exceeding 100% of compensated activities;
- Ensure the records encompass federally-assisted and all other activities compensated by the District on an integrated basis, but may also include the use of subsidiary records as defined in the District's written policies;
- Comply with the established accounting policies and practices of the District; and
- 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 that are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.

The District shall ensure that records are completed within ten (10) days of the period. All documentation for such records must be signed within ten (10) days of the work performed.

Certified employees of the District who are paid in whole or in part with federal funds must keep specific documentation to demonstrate that the amount of time they spent on federal grant activities is allowable or chargeable to the grant. Time distribution records are in addition to the standards for payroll documentation. For personnel costs to be allowable, they must be necessary, reasonable, and allocable to the federal

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cost objective to which they are being charged and appropriately documented.

Classified employees of the District who are paid in whole or in part with federal funds must keep specific documentation to demonstrate that the amount of time they spent on federal grant activities is allowable or chargeable to the grant. This includes an employee whose salary is paid with state or local funds, but is used to meet a required "match" in a federal program. Records for time distribution will be maintained through the district's time management system and reflect actual time worked. Each classified employee's time will be reflected in the individual schedule for the school location with which they are working. For personnel costs to be allowable, they must be necessary, reasonable, and allocable to the federal cost objective to which they are being charged and appropriately documented.

Single Cost Objectives:

Documentation is required of employees who spend 100% of their time working on a single cost objective. This documentation must be signed after the fact by the employees and/or a supervisor who has firsthand knowledge for the work performed by the employee.

Multiple Cost Objectives:

An employee is considered to work on multiple cost objectives if they work on: more than one federal award; a federal award and a non-federal award; an indirect cost activity and a direct cost activity; two or more indirect cost activities which are allocated using different cost bases; or an unallowable activity and a direct or indirect cost activity.

All cost objectives must be included but non-federal cost objectives may be included as single "non-federal activities" cost objectives.

Blanket Certifications: The District may issue blanket certifications that cover time and effort documentation for

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multiple employees working on a single cost objective. Such blanket certification must specify the covered time period and comply with the documentation requirements listed under the multiple cost objectives section above.

Stipend/Extra Duty Pay: If a stipend or extra-duty pay is paid to employees out of a federal award in addition to an employee's regular work, an extra duty agreement issued by the district indicating time and rate of pay will serve as documentation. Stipend and extra-duty work must be documented separately from an employee's regular work, even if such work is for a single cost objective.

Signatures for Former/Unavailable Employees: A supervisor who is aware of the work performed by an employee who is no longer employed with the District may sign the documentation so long as they note that the employee is unable to sign on the employee signature line.

Digital Signatures: A digital signature is acceptable to the extent the District has sufficient internal controls in place to verify the digital signature could only be created by the relevant employee or supervisor, such as through a unique login ID or a secret password. PDF signatures are not acceptable.

Reconciliation: Payroll charges must match the actual distribution of time recorded on time and effort documentation. At least quarterly, the District must review the time distribution records and compare actual costs to budgeted distributions. When percentages of time are distributed differently than planned, modifications must be made to distribute the charges so they will be a perfect match to the actual time worked on each cost objective. Reconciliation of all necessary adjustments must be made such that the final amount to the federal award is accurate, allowable, and properly allocated.

Reference: Uniform Grant Guidance (2 CFR §200.430).

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