



TIME AND EFFORT GUIDELINES

Time and effort reports are after-the-fact records that reflect how faculty and staff spent the time for which they were compensated by the educational institution. Time and effort reporting should also be used to estimate the time and effort that employees will dedicate towards the SNAP E&T program at your college. Some employees may need to continue to track their time and effort on the program weekly, depending on the amount of time they dedicate to the SNAP E&T program.

Time and effort reports must be a single, certified document that reflects 100% of an employee's time worked in a given period.

Proper time and effort reporting includes accounting for salary, wages and benefits and certifying actual time charges for:

1. Cost-sharing, matching funds, or leveraged funds required for federal programs.
2. All other activities not funded by a program (grant and non-grant time) for which the individual staff are compensated.

What are the federal policies for time and effort reporting?

As a community college, accounting and fiscal departments should be familiar with the federal time and effort reporting requirements. The policies below guide internal processes and systems of record keeping.

2 CFR 200 "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards" is the federal government's cost principles for colleges and universities. It defines what costs are allowable and allocable to Federal grants and other assistance programs. Salary, wage and benefit charges to grant awards are allowable only if they are supported and documented by an acceptable time and effort report.

2 CFR 200.430-431 sets the criteria for acceptable methods of charging salary, wages and benefits to federal grants. It requires a payroll distribution system that allocates salary, wages and benefits to the appropriate project accounts based upon reliable personnel activity reports. It also requires the institution to develop procedures to confirm how an individual's time should be charged to each grant award.

What Is the Difference between Effort Reporting and Payroll Distribution?

Payroll distributions and effort reports are not the same. Payroll distributions are the distribution of an individual's salary and benefits in the accounting records, while effort reports describe the allocation of an individual's actual time and effort for specific projects, whether reimbursed by the grantor. Payroll distributions to each grant or cost objective are done initially based on budget estimates and then adjusted to agree with effort reports for the final payroll distribution.

- Accounting tracks the detailed payroll accounting transactions to accounts created for individual grant agreements and other institutional activities.
- Certifying is attesting that salaries, wages and benefits charged to the grants (including required match portions) and to other institutional activities (including voluntary match) is *reasonable* in relation to the time and effort actually performed. Time and effort reports must be signed by someone with first-hand knowledge of the work performed.

This is a high-level overview and accounting and fiscal offices are often responsible for maintaining documents related to both time and effort and payroll. It is recommended that lines be added to time sheets for employees to enter hours worked on federal programs like E&T to assist with the administrative burden. Managers typically approve employee time sheets and have first-hand knowledge of hours worked on each program.

Why is time and effort tracking so important?

The federal government requires time and effort reports for all faculty or staff who are compensated, in whole or in part, by a federal grant, or whose efforts are used to satisfy a required or voluntary match or leveraged funds for federal grants.

Additionally, time and effort reporting is important in SNAP E&T because SNAP E&T activities can only be reimbursed for services for SNAP recipients enrolled in your college's SNAP E&T program. If a guidance counselor or student support specialist is spending half of their time serving WIOA participants and half of their time supporting SNAP E&T participants, that must be accurately accounted for, and reflected in time and effort reporting *if their salary or benefits are covered in part by those program fund sources*.

Note: You do not need to provide time and effort reporting for employees not being billed to the SNAP E&T program.

Types of reporting systems

An acceptable effort reporting system must provide records on how individuals participating in federally funded grant programs spend their time. These "systems" are internal processes used to develop, maintain, and implement the recordkeeping required by the federal government. These are often systems you already have in place. Examples of these systems are managers signing employee timesheets, department budgets and allocations, basic accounting practices like itemized invoices, project plans, program data, and more.

Because the federal government mandates effort reporting it is incumbent upon institutions receiving federal funding to maintain accurate and auditable systems and records.

Three examples of acceptable effort reporting systems are:

1. After-the-Fact Activity Report System
2. Plan-Confirmation System
3. Multiple Confirmation System

Classification of Employees	Acceptable Time and Effort Reporting Systems for Employees Funding in Whole or in Part by a Federal Grant
Classified, hourly, student workers	1. After-the-Fact Activity Report Systems
Professional/Exempt	1. After-the-Fact Activity Report Systems 2. Plan-Confirmation System 3. Multiple Confirmation System
Professorial/Faculty	1. After-the-Fact Activity Report System 2. Plan-Confirmation System 3. Multiple Confirmation System

Reminder: these “systems” are internal administrative processes used to meet the federally required recordkeeping policies.

After-the-Fact Activity Report System

An after-the-fact activity report for employee activities on a federal grant is a comprehensive document utilized to retrospectively document and account for the actual efforts and tasks performed by employees in relation to the grant-funded program or project. This report is used in compliance and transparency efforts, and includes an itemized account of personnel, their titles and basic duties, and the associated time allocations. These reports serve as retrospective records, allowing federal agencies, auditors, and grantors to assess whether the employee activities aligned with guidelines, budgets, and established timelines. In essence, they play a role in ensuring accuracy and transparency in the management of grants and contracts by capturing an account of employee contributions.

Plan Confirmation System

A Plan Confirmation System structured process that ensures accurate tracking, documentation, and verification of employee time and effort allocated to federally funded projects. It involves documenting personnel assignments, regular time and effort reporting, revisions of salary distributions based on actual work performed, confirmation by supervisors, compliance checks, detailed record-keeping, and the creation of an audit trail.

Multiple Confirmation System

A multiple confirmation system is a comprehensive approach that aims to enhance accountability and ensure adherence to grant or program regulations. This system involves the retrospective documentation and validation of employee time, effort, and tasks. It encompasses a multi-step process, including the initial tracking of time and effort, confirmation by supervisors,

cross-verification of expenditures and activities, and the creation of a detailed audit trail. By engaging multiple levels of oversight and confirmation, this system strengthens compliance efforts and provides a robust mechanism for ensuring that employee activities align with guidelines, budgetary constraints, and timelines. It offers a layered approach to transparency, allowing federal agencies, auditors, and states to assess the accuracy and integrity of budgets, expenditures, client support, and more.

What is the difference between a plan confirmation system and a multiple confirmation system?

While both systems aim to ensure compliance with grant regulations, a plan confirmation system focuses on upfront planning and adherence to the initial plan, while a multiple confirmation system places greater emphasis on retrospective verification and validation of actual activities and expenditures after they have occurred, while also providing documentation on the upfront planning and initial plan. The choice between the two systems often depends on the specific requirements and preferences of the state or intermediary.

How to Estimate Time & Effort for Your Budget

Your college may already have established procedures for tracking time and effort, especially for federally funded programs.

To begin, estimate the percentage of an employee's time that will be allocated to the SNAP E&T program. For instance, you might have an accountant or fiscal specialist who dedicates 10 hours per week, equivalent to 25% of their total working hours, to the SNAP E&T program. From there, identify the non-federal funding source to cover the cost of this 25% of the employee's salary and benefits.

Below, you'll find an example illustrating how to outline the funding sources for each employee's salary and the corresponding percentage of their salary charged to each fund source.

To reflect time and effort in the budget, the employee's FTE rate is applied to their salary and benefits, calculating the dollar amount. Typically, budgets are done annually, and the state or intermediary reimburses providers on a monthly or quarterly basis, but this will vary state to state. On the spreadsheet below you will see how to estimate both your 50% reimbursement and the 50% amount needed to support the program in your college's budget.

Reconciling

If initial payroll costs are recorded in the accounting system based on estimates, they must be reconciled prior to the end of the grant period and/or the end of the fiscal year. If the grant year and the fiscal year are different, payroll costs must be reconciled before the end of both the grant period and the fiscal year. It is best practice to reconcile quarterly.

If the variance between what was budgeted and actual time worked is greater than 5%, accounting records must be adjusted to reflect actual and any overage that may have been charged to the grant must be reduced from the next grant invoice. For example, if an employee

was changed 40% to a federal Perkins grant, but the employee’s year-to-date time and effort reports showed they’d spent less than 35% of their time working on Perkins activities, the organization must refund the difference to the grant.

See sample T&E form below:

Employee Semi-Monthly Time Sheet															From: MM/DD/YY		To: MM/DD/YYYY		
															7/1/2022		7/15/2022		
Name (Last, First, M.I.)	Title										ID	Division/Department							
	CASE MANAGER											Workforce Education Services							
Program/Funding Source	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Semi-Monthly		Total yearly%	
	FRI	SAT	SUN	MON	TUE	WED	THU	FRI	SAT	SUN	MON	TUE	WED	THU	FRI	Hours	%		
E&T	6.00				3.00	3.00	1.00	3.00				1.00	4.00	2.00	1.00	24.0	32%	30%	
Workforce Program																0.0	0%		
TANF					1.00	4.00	3.00				4.00	3.00	5.00	8.00	6.00	34.0	45%	46.50%	
Needs Grant					4.00	6.00					3.00	1.00	2.00	1.00		17.0	23%	23.50%	
Total Program Hours	6.00	0.00	0.00	0.00	3.00	8.00	11.00	6.00	0.00	0.00	8.00	8.00	9.00	10.00	6.00	0.00	75.0	100%	100%
Annual Leave (Vacation)																0.0			
Personal Leave																0.0			
Sick Leave					5.00											5.0			
Holiday Leave				8.00												8.0			
Total Paid Hours	6.00	0.00	0.00	8.00	8.00	8.00	11.00	6.00	0.00	0.00	8.00	8.00	9.00	10.00	6.00	0.00	88.00	100%	
Leave Without Pay																0			
Comments:	I certify that to the best of my knowledge the above allocation of time expended performing federal and non-federal program duties is reasonable in relation to the work performed.																		
																7/16/2022			
	Employee Signature															Date:			
	Immediate Supervisor Signature															Date:			

This resource was developed with the expertise of Seattle Jobs Initiative (SJI), which helps organizations to build, grow, and optimize workforce, education, and public benefit programs. This includes working with the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS), more than 40 states, counties, and providers to implement and grow high-quality SNAP E&T programs. Learn more about how SJI can help you with SNAP E&T at <https://www.seattlejobsinitiative.com/consulting/>.

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