Federal and State Monitoring

Title I Directors
Conference September 2014
OMB Omni Circular and Time and Effort Documentation
Topics of Interest

• Overview of OMB Uniform Administrative Requirements, Cost Principals and Audit Requirements for Federal Awards

• Time and Effort
OMB Super Circular

- Subrecipient Monitoring
- Compensation Personal Services
- Single Audit Requirements – Threshold
- Written Policies and Internal Controls
Super Circular Subrecipient Monitoring – Risk Assessment

- Prior Experience with same or similar awards
- Results of previous audits
- Is the LEA required to have a A-133 Audit
- New Personnel or substantially changed systems
- The results of Federal awarding agency monitoring
Super Circular Compensation
Personal Services

- Increases emphasis on internal controls of subrecipient for personnel cost.
- Provides less prescriptive guidance on documentation
Super Circular Single Audit Requirements – Threshold

- Increases the Requirement for an A-133 Audit from current level of $500,000 to $750,000
Super Circular Written Policies and Internal Controls

- Increased requirements for written policies for Federal Grants
- Increased emphasis on LEA’s Internal Control Structure
Time and Effort Requirements

• For any staff paid from a federal grant, the grant rules requires that time and effort certification be maintained.
Required Time and Effort Documentation

• Semiannual Certification
  – Single Cost Objective
    • Works on one Federal Award
    • Totally funded by Federal Award
Required Time and Effort Documentation

- Personnel Activity Report – PAR
  - Multiple Cost Objective
    - Works on more than one Federal Award
    - Is split funded
Reminders for Time and Effort

• Documented Policy and Procedures for Time and Effort
• Ongoing Training of Staff Regarding Time and Effort
• Maintaining Time and Effort Records
Time and Effort Findings

• Not accounting for changes in position, duties or funding source
• Reporting according to how ratios were budgeted when different from actual
• Reports not reviewed or signed by appropriate staff
References and Helpful Links

• United States Department of Education: http://ed.gov
• Office of Management and Budget (OMB) Circular A-87: http://www.whitehouse.gov/omb/circulars/a087/a87_2004.html#atta
• State and Federal Grant Administration Policy and Fiscal Requirements and Procedures: http://www.isbe.net/funding/pdf/fiscal_procedure_handbk.pdf
• http://www.isbe.net/e-bulletins/default.htm
• http://isbe.net/ea/htm/checklist.htm
Contact Information

Illinois State Board of Education
Federal and State Monitoring Division
100 North First Street
Springfield, IL 62777
217-782-7970
Questions and Answers