

DOCUMENTATION REQUIREMENTS FOR GRANTEES ON COST REIMBURSEMENT

General Guidance

Under the Cost Reimbursement method of funding, the grantee is required to finance its operations with its own working capital with payments being made to reimburse the grantee for actual cash disbursements supported by adequate documentation. Costs are only reimbursed when required matching costs have also been incurred.

The following instructions have been assembled by the Office of Inspector General (OIG) and the Grants & Contracts office (G&C) to assist grantees who have been placed on the Cost Reimbursement method of funding for requesting reimbursement of costs incurred and paid under a grant. These instructions should be followed for every Payment Request form submitted to the G&C while the grantee is on this payment system. **If the grantee does not follow these requirements, the G&C will be unable to review and process the submitted reimbursement request, and the entire request will be returned.**

All Payment Requests with appropriate documentation must be submitted to the G&C. Please contact either the G&C at (202) 682-5403 or the OIG at (202) 682-5402 if you have any questions.

Specific Guidelines

For the G&C to efficiently process the grantee's Payment Request for reimbursement, it is essential that you follow the specific guidelines provided below.

A. Submitting the Payment Request for Advance or Reimbursement (Payment Request)

All grantees on the Cost Reimbursement method are required to submit the Payment Request form when requesting a reimbursement. While on the Cost Reimbursement method of funding, please note "*reimbursement*" on the form and not an advance. This documentation will verify the expenditures covered and the required match. The Payment Request, Summary Cover Sheet, and documentation should be faxed to (202) 682-5609/10 or sent via a delivery service to the National Endowment for the Arts, Grants & Contracts Office, Room #618, 1100 Pennsylvania Ave., NW, Washington, DC 20506.

B. Allowable Costs

Payment Requests must be supported by appropriate documentation for the allowable expenditures incurred and paid on the grant. If you are unsure whether a particular expenditure is allowable, consult your approved project budget and/or the appropriate OMB Circulars -- A-110, A-21 and A-122 for Nonprofit and Institutions of Higher Education or A-102 and A-87 for State and Local Governments. The Circulars have been relocated to 2 CFR Parts 220, 225 and 230. Alternatively, contact the G&C if additional assistance is needed.

C. Appropriate Forms of Documentation

To be reimbursed for allowable expenses, the grantee must provide evidence that costs were incurred and paid. Generally, this will take the form of an invoice, receipt or contract supported by a copy of a cancelled check/electronic copy or other document supporting that the transaction was enacted; ie., bank statement, electronic reference, etc. Note that all copies of cancelled checks, submitted as documentation, should include both the front and back of the check. If the back side is not available, a copy of the respective bank statement can be substituted. (For reimbursement of wages and fringe benefits, personnel activity reports are required - see part F below.)

D. Summary Cover Sheet and Attached Supporting Documentation

Accompanying each Payment Request should be a Summary Cover Sheet, which displays summary data regarding the request. The Summary Cover Sheet should include the following information: check numbers, date of check, and payee; amount of expense; form of supporting documentation (i.e. invoice, receipt, contract, personnel activity report, etc.); and a brief explanation of the purpose of the expense (see suggested format in Attachment 2).

All supporting documentation for each expense should be accompanied by a copy of a cancelled check/electronic copy and arranged in the same order as the checks identified on the Summary Cover Sheet. In addition, all documentation must be legible.

Helpful Hints. Summary Cover Sheets must be complete, accurate, and well organized. Pages should be numbered or grouped to facilitate cross-referencing of checks and supporting documentation. For the first Payment Request submitted by a grantee (and/or the person preparing the request), the initial number of transactions documented should be small so that any deficiencies in the submission that are identified by the grants specialist can be corrected with the minimum amount of effort.

1. Listing of Cancelled Checks/Charges. Each cancelled check/charge should be listed either sequentially by check number or in some logical order if grouped by cost category.
2. Date Check Written/Charge Incurred. Provide the date that the check was written or the charge was incurred.
3. Payee. Identify to whom the check was written.
4. Total Amount of Expense. Identify the total amount of the expense reflected in the corresponding check. An explanation in the form of a footnote must be provided if the

total amount of the check is different than the amount used in the supporting documentation.

5. Form of Documentation. Identify the type of supporting documentation (i.e. invoice, contract, receipt, personnel activity reports, etc.).
 6. Explanation. Provide a brief explanation of the purposes for which the costs were incurred if not self evident by the payee.
 7. Signatures. The Summary Cover Sheet must be signed and dated by both the **preparer and an authorizing official** other than the preparer. The authorizing official should ensure that the Summary Cover Sheet and supporting documentation are organized and easy to follow. (An authorizing official is an official at the organization with authority to legally bind the organization.)
- E. Matching Requirements. Unless noted on the grant award letter, all grants are 1:1 matching awards. The grant matching requirement is directly related to the amount of funds for which you may be reimbursed by the NEA. For example, if the grant has a 50/50 matching requirement, the NEA can only reimburse you for 1/2 of the costs documented.
- F. Personnel Activity Reports. For wage and fringe benefit expenses, personnel activity (time and effort) reports are required for nonprofits, and state and local governments. OMB Circular A-122 requires a nonprofit to maintain records of employee time, account for a full day's work, be able to identify the portion devoted to grant projects, and be prepared at least monthly and coincide with one or more pay periods. (A state or local government should see OMB Circular A-87 for specific guidance for preparing personnel activity reports.) A sample format for presenting such information in accordance with OMB Circular A-122 is provided in Attachment 1. However, if the grantee is currently recording such information in another format, please request the OIG's approval of this format before submitting the reports with the grantee's other documentation. The Summary Cover Sheet should indicate the total amount of wages and fringe benefits, the net amount of the pay check, and the amount of wages and fringe benefits applicable to the grant.

Personnel activity reports should be signed by both the employee and the employee's supervisor. The personnel activity reports should also be cross referenced to the Summary Cover Sheet so that one can easily identify the individuals and amount (or percent) of time that they devoted to the specific NEA project for which reimbursement is requested.

NOTE: The NEA does not waive the requirement to maintain personnel activity reports for nonprofit organizations and institutions of higher education under the cost reimbursement method of funding.

G. Use of In-kind Contributions

The use of in-kind contributions (e.g., donated services, goods or facilities for which a dollar value can be established) can only be used for matching purposes if they are allowed in the approved project budget. Furthermore, the use of such contributions must be verified in the format provided in Attachment 3. The NEA reserves the right to disallow any expenditure that is not documented or is in excess of reasonable costs for such services, facilities, or goods provided. Detailed information on in-kind contributions is located in OMB Circular A-110, Section 23 or the Common Rule, Section 1157.24, and 2 CFR 215, as appropriate.

H. Use of Automated (ADP) Prepared Financial Reports

If the grantee uses an automated accounting system that separately tracks expenses associated with the project or activity supported by the NEA, a copy of such documentation may be submitted in lieu of the Summary Cover Sheet with each Payment Request if:

1. Contained on the ADP generated sheets are the account numbers and applicable category of expense (this can be handwritten on the report if necessary), period of time covered, payee and amount of expense. The check numbers and date of issue should also be identified.
2. The following supporting documentation is provided and arranged in the same order as, and cross-referenced to, the information conveyed in the ADP generated report:
 - a. copy of cancelled check/electronic copy; and
 - b. attached to each check is supporting documentation such as personnel activity reports, invoices, etc. (NOTE: An explanation in the form of a footnote should be provided if the total amount of the check is different than the total amount of the supporting documentation.)
3. The ADP report is signed and dated by both the preparer and an authorizing official other than the preparer.

RELIEF FROM THE COST REIMBURSEMENT DOCUMENTATION REQUIREMENTS

The grantee should notify the OIG as soon as the recommendations prescribed in the Audit Report have been met and its fiscal systems and/or financial condition have improved. At that time, the OIG will request additional information in order to make a determination as to whether the grantee can return to the regular method of funding or a less stringent method of funding. If the OIG is not kept apprised of the grantee's financial condition, the grantee will remain on the cost reimbursement funding method as long as it receives grants from the NEA.

Attachments

The following attachments have been included for your use. Please remember that you must include a Summary Cover Sheet with each reimbursement request that is submitted to the NEA.

Attachment 1. Sample Personnel Activity Report.

Attachment 2. Sample Summary Cover Sheet.

Attachment 3. Sample In-kind Contribution Report.

**SAMPLE PERSONNEL ACTIVITY REPORT
(TIME AND EFFORT REPORT)**

Organization Name: _____		
Employee's Name _____	Week Ending _____	
<u>Activity</u>		<u>Distribution of Time</u>
Arts Endowment		
1. Grant		_____ %
2. Grant		_____ %
Other		
3. Project name		_____ %
4. Project name		_____ %
5. Project name		_____ %
Administrative		_____ %
Fundraising		_____ %
Leave		
Sick		_____ %
Vacation/annual		_____ %
Other (specify)		_____ %
TOTAL:		<u>100</u> %
Employee's Signature _____		Date: _____
Supervisor's Signature _____		Date: _____

In preparing personnel activity reports, please note the following:

- The reports must be based on an after-the-fact determination of the employee's actual activities (i.e., these cannot be estimated in advance). For example, the distribution of time might be determined based on notes from personal calendars and/or reasonable estimates of time spent on various activities.
- All of the employee's compensated time must be accounted for in these reports. This would include time spent on activities in addition to the Endowment-supported project(s), as well as leave (sick/vacation/holiday), administrative duties, etc. **NOTE: For nonprofessional employees, grantees must also maintain records indicating the total number of hours worked each day in conformance with the Fair Labor Standards Act (29 CFR Part 516).**
- The reports must be signed by the employee or a responsible supervisory official.
- Reports must coincide with one or more pay periods and be used to reconcile salary and fringe benefit costs to appropriate accounts on a regular (preferably monthly) basis.
- Unless otherwise specified in the grant award letter or if the organizations is on either working capital advance or cost reimbursement method of funding, the Endowment waives the requirement to maintain personnel activity reports for nonprofit organizations and institutions of higher education receiving an award of less than \$50,000 starting with year 2005 awards. However, appropriate records must be maintained to verify any expenses attributed to Federal/matching funds.

NATIONAL ENDOWMENT FOR THE ARTS**SAMPLE SUMMARY COVER SHEET**

GRANTEE NAME: _____

GRANT #: _____

Check No.	Date of Check	Payee	Total Amount Of Expense Claimed	Type of Documentation	Explanation
101	7/01/08	Dane Lewis	\$ 150.00 ^{1/}	Pers. Act. Report	Salary
102	7/05/08	Henry Supply Co.	112.66	Invoice	Supplies - Art
103	7/05/08	The Mike Miller Band	800.00 ^{2/}	Contract	Performance Advance
104	7/12/08	Blue Lights Co.	150.00 ^{3/}	Invoice	Light Fees
VISA	7/12/08	Home Hardware	220.00	Charge, Invoice	Stage Lumber
105	7/12/08	The Mike Miller Band	<u>\$1,200.00</u> ^{2/}	Contract	Performance Fees
Total Grant Costs			<u>\$2,632.66</u>		

^{1/} Gross salary was \$600.00; net check was \$400.00; \$150.00 applies to 25% of time spent on grant.

^{2/} Total contract was for \$2,000 of which \$800 represents advance.

^{3/} Check was for \$200, but included a \$50 payment on a previous billing unrelated to the current grant.

Prepared by:

Signature/Title_____
Date

Reviewed and Approved by:

Signature/Title_____
Date

SAMPLE IN-KIND CONTRIBUTION REPORT

Report of
SERVICES RENDERED, GOODS DONATED, FACILITIES PROVIDED
to the

_____ (name of organization) _____

Project: _____

Donor Organization: _____

Address: _____

Donor's Signature: _____ Phone: _____

Position: _____

Date(s) services were performed, goods were donated, or facilities provided for project:

Services Rendered:

		VALUE
by _____	hours _____	\$ _____
by _____	hours _____	_____
by _____	hours _____	_____
by _____	hours _____	_____
by _____	hours _____	_____

Others listed on reverse; amount from reverse: _____

Total Services \$ _____

Goods Donated:

Item _____	\$ _____
Item _____	_____
Item _____	_____

Others listed on reverse; amount from reverse: _____

Total Goods \$ _____

Facilities Provided:

Place _____	\$ _____
Place _____	_____
Place _____	_____
Place _____	_____

Others listed on reverse; amount from reverse: _____

Total Facilities \$ _____

TOTAL VALUE \$ _____

APPROVED BY:

Name: _____

Title: _____

Date: _____

Note: Please attach an explanation of the bases for the valuation of each item and any supporting documentation.