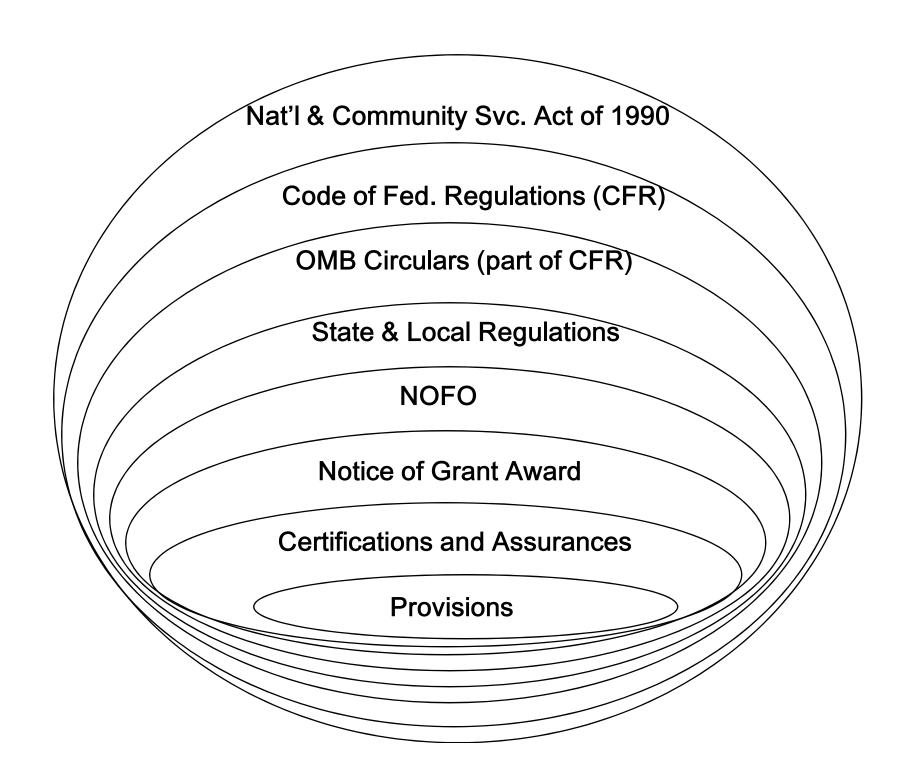
## **New Program Start Up**

Taking Financial Management Home November 28, 2007

## **Session Objectives**

- To discuss information presented in Memphis, TN at the Program Start-up Institute with Program and Fiscal Staff.
- To provide participants with information related to the Fiscal Assessment and discuss next steps.
- To review ideas for additional training.



## **CNCS Grant Provisions**

## Created by CNCS officials and include:

- Guiding principles for Grant Activities
- Contain both Program and Fiscal guidelines

## Highlights:

- Limit on consulting
- Living allowance distribution

Grant Provisions <u>www.cns.gov</u>

# How & when do I use the OMB Circulars?

The Circulars provide information relevant to the grant in the following areas:

- –Cost Principles
- AdministrativeRequirements
- -Audits



## **Summary of Relevant OMB Circulars**

#### Summary of Relevant OMB Circulars

	Educational Institutions	Non-Profit Organizations	State & Local Governments		
Uniform Administrative Requirements	45 CFR 2543 & Circular No. A-110	45 CFR 2543 & Circular No. A-110	45 CFR 2541 & Circular No. A-87		
Cost Principles	Circular No. A-21	Circular No. A-122	Circular No. A-102		
Audits	Circular No. A-133	Circular No. A-133	Circular No. A-133		

Each of the specific circulars can be downloaded from the internet at the following address:

Http://www.whitehouse.gov/OMB/circulars/index.html

# Standards of Allowability

- Reasonable
- Necessary
- Allocable
- Authorized and legal
- Limits on costs
- Consistent
   Treatment

- Accounting Principles
- Not Double Charged
- Net of applicable credits
- Documented
- Cost Accounting Standards

# **Cost Principles**

## Examples of costs listed in Circular:

- Advertising and public relations costs
- Compensation for personal services
- Memberships, subscriptions, and professional activity costs
- Recruiting costs
- Rental costs
- Training and education costs
- Travel costs



## **Administrative Requirements**

## Examples of items addressed in Circulars:

- Pre-Award policies
- Special award conditions
- Standards for financial management systems
  - Procurement
  - Records Retention
  - Program Income
  - Financial Reporting
- Cost sharing or matching

## **Audit Requirements**

### OMB-133 Audit

- Standards for obtaining consistency and uniformity among Federal agencies for the audit of organization's expenditure of Federal funds.
- Applicable to organizations that expend \$500,000 or more of federal funds in a year.



# **Budgeting**



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## **Budgetary Controls**

- Budget should link programmatic and financial activities
- Reviewing budgets and actual expenses can prevent cost overruns when monitored on a regular basis
- Overruns may result in disallowed costs
- Helps staff responsible for specific activities to maintain control over expenditures

# **Budget Management**

AmeriCorps programs must obtain prior approval for:

- Changes to increase or reallocate funds for the member support category
- Purchase of equipment over \$5,000 that was not included in the original budget
- Cumulative reallocation exceeding 10% of total budget Changes in scope, objectives or goals of program
- Substantial changes in level of participant supervision
- Additional sub-grants or contracts

# **Proper Documentation**



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## **Documentation Objective**

## All documentation should support:

- What is the service or goods obtained
- Why the transaction is allowable for the grant purposes
- The value of the contribution

# Documentation should also ensure that costs:

- Conform to grant/contract limitations
- Are treated consistently
- Determined in accordance with Generally Accepted Accounting Principles (GAAP)

## Time & Activity Reporting – Summary

All salaries and wages charged to grants must be supported by signed timesheets

## **Exceptions:**

- State, Local and Indian Tribal Governments must comply with requirements of OMB A-87
- Educational Institutions must comply with requirements of OMB A-21

# Time & Activity Reporting – OMB A-122

# OMB A-122 requirements of documentation for timesheets:

- Must reflect an after-the-fact distribution of the employee's actual activity
- Must account for the total activity of each employee
- Must be prepared at least monthly and must coincide with one or more pay periods
- Must be signed by the employee or supervisor having first hand knowledge

## Cash and In-kind Match



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# Matching Requirements and In-kind Contributions

### Match

- Must be verifiable from recipient records
- Must not be included as contribution for other federally-assisted programs
- Must be necessary for accomplishing program objectives
- Must be allowable according to cost principles (OMB Circulars) and grant provisions

## **AmeriCorps Match Requirements**

## Statutory requirements:

## AmeriCorps Budget Section II

Member support match must be minimum
 15% non-federal cash

## AmeriCorps Budget Sections I & III

Operating expenses are a minimum 33% of total operating costs

# Valuing In-Kind Match

Use Fair Market Price



- Consider what it would cost to obtain similar good or service
- Value of donation should be placed by the donor
- Review donorís letter or form to ensure the value is reasonable

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## **Exception: Volunteer Match**



Do not count as match -

The value of <u>direct community services</u> performed by volunteers



### Do count as match -

- Services that contribute to <u>organizational</u> <u>functions</u>
- Count services such as accounting, training of staff or members that are elements of the grantee's cost allocation plan

## **Documenting In-Kind Contributions**

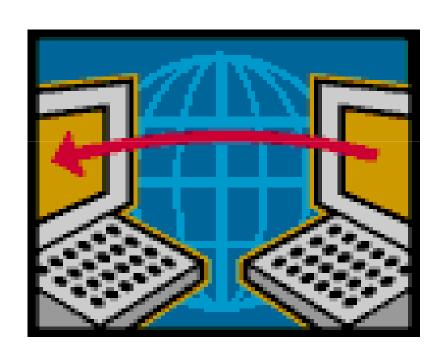
- Document the <u>donor's basis</u> for determining value of personal services, material, equipment, building, and land
- Obtain written acknowledgement from the donor to include:
  - Date and location of donation
  - Detailed description of item/service
  - Estimated value of contribution, how value was determination



Name and signature of donor

Keep a copy of the receipt in your files

# **Financial Reporting**



# Critical elements for all financial reports

- Timely Ensure all deadlines are met
- Accurate Use accounting data that has been reviewed
- Complete Reports should contain all pertinent information relating to reporting period

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# **Efficient Accounting System**

### System must be capable of:

- Distinguishing grant versus non-grant related expenditures
- Identifying costs by program year
- Identifying costs by budget category
- Differentiating between direct and indirect costs (administrative costs)
- Maintains Federal/non-Federal matching funds separately from grant funds
- Records in-kind contribution as both revenues and expenses

# Major Processes for Preparation of the Financial Status Report

- There should be proper documentation in the files to support all information reported in financial report.
- All financial reports should be prepared with information that comes directly from the organization's accounting system.
- There should be a review and reconciliation of the information to ensure accuracy prior to report submission.

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# **Financial Status Report**

### Financial Status Report (FSR) Form 269A (Short Form)

- File on a semi-annual basis (special conditions may require quarterly reporting)
- Report collects:
  - Identifying information (automatic in eGrants)
  - Project period of the grant and reporting period dates (automatic in eGrants)
  - Total program costs, including match
  - Unliquidated obligations
  - Indirect cost rate calculations
  - Remarks
  - Certification

# Timing of Draws from Payment Management System

- Funds are intended to be available when needed
- Draws should matched timing of allowable program expenditures
- Funds can be drawn as needed:

Example – Payroll to cover salaries and allocable payroll taxes based on time charged to the Federally-funded program



## **Internal Controls**

## Written Policies & Procedures



# Document Internal Controls through Policies & Procedures

Documented Policies and Procedures are important because:

- They are the standards for the organization's operations
- They help in maintaining information that is crucial to operations that would otherwise remain in employees' "heads"
- They help in orienting new employees and substitutes if the appropriate personnel are absent

# Examples of Key Items To Include in Policies & Procedures

- Authorizations of transactions
- Payroll procedures
- Cash receipts procedures
- ProcurementPolicies

- Travel regulations
- Financial Reporting
- Budgeting
- Record Retention
- Conflict of Interest

### Other Webinar Ideas

- Financial Management Issues
  - Drawing Down Funds (HHS)
  - Financial Reporting
    - Financial Status Report
    - Federal Cash Transaction Reports
  - Budget Management
    - Allowable costs
    - Amending budgets

## Other Webinar Ideas

## **Grants Management**

- Matching Funds & In-kind Contributions
- Timekeeping (staff & members)
- Member Management
  - Background Checks
  - Evaluation
  - Living Allowance Distribution
  - Time keeping

## Other Webinar Ideas, Cont.

- Subgrantee Oversight
  - Reimbursements
  - Financial Reporting for subgrantees
  - Training subgrantees
  - Monitoring subgrantees

## Resources



**Tools and Sample Documents** 

## **Separation of Duties Worksheet**

#### SEPARATION OF DUTIES WORKSHEET

Enter names and titles of staff who have responsibilities at top. Place checkmark below name if person has responsibility for that function. Check to see if there are other audit or bookkeeping duties not named.

NAME Approves Purchase Orders Verifies Receipts of Orders Prepares Requests for Funds Authorizes Disbursements Prepares Checks Signs Checks- Manual Signs Checks- Machine Custodian/Check Signing Device Custodian of Blank Checks Compare Checks with Vouchers Distribute Checks Post Disbursements Computes Cost Allocation Receives Cash Post Receipts Deposits Receipts Custodian of Petty Cash Petty Cash Replenishment Audits Petty Cash Bank Reconciliation Maintains General Ledger Prepares Financial Reports Approves Financial Reports Approves Financial Reports	1 &		 	 	 	 
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# Sample In-Kind Contribution Form

The ABCD Tutoring Program
1299 N Main Street, Suite 110, Great City, Good State 00000-1234, (800) 555-1212, Fax 321-1234

#### In-Kind Contribution Form

Date of Contribution	Description of Contributed Item (s) or Service	Purpose for W hich Contribution W as Made	Real or Approximate Value of Contribution	How Was Value Determined? (i.e. Actual, appraisal, fair market value)	W ho Made This Value Determination?	Was Contribution Obtained With or Supported By Federal Funds? (If so, indicate source)		
				_				
Name of Contr	ibuting Organization/Agency/Busines	ss/Individual:				<u> </u>		
Address of Above Contributor:								
Printed/Typed	Name of Contributor's Authorized Si		Title:					
	uthorized Signee:		Date:					

# **Sample Time Sheet**

Sample	Time Sheet					
Name:		Pay Period Fr	om:	To:		
Date	Description of work performed	Grant 1 AmeriCorps	Grant 2 - Reasons to Read	Grant 3 - State DOE	Other	Total Hours
Sun						
Mon						
Tues						
Weds						
Thur						
Fri						
Sat						
			Total Hour	s Worked		
	Employee Signature					
	Supervisors Signature					

## **Job Descriptions**

### **Should Include:**

- Job Title:
- Reports To:
- Supervises:
- Basic Function:
- Duties and Responsibilities:
- Qualifications:
- Classification:

## More on Financial Reporting

- eGrants: <a href="http://www.cns.gov">http://www.cns.gov</a>
  - Direct grantees
  - Financial Status Reports
- WBRS: <a href="http://wbrs.net">http://wbrs.net</a>
  - Subgrantees
  - Periodic Expense Reports
  - Financial Status Reports
- HHS Payment Management System: <u>http://www.dpm.psc.gov</u>