

South Carolina Department of Education Update

SCASBO 2023 Spring Conference

“Passing the Torch- Shaping the Future”

March 9, 2023

Budget Data

- Projected Weighted Pupil Units for FY 24 (local districts only) - 1,177,200
- Projected Weighted Pupil Units for FY 24 (Charter Authorizers) - 116,960
- Estimated SE Average Teacher Salary-\$58,048
- Average Teacher salary used for funding formula-\$55,104



Budget (Ways & Means)

- State Aid to Classrooms- \$260.9 million in recurring new funding
 - Roll-up:
 - Student Health and Fitness (3127)
 - Student Health and Fitness- Nurses (3136 and 3536)
 - EEDA Career Specialists (3118)
 - PMD (3199I)
 - Total \$187.4 million (General Fund) and \$136.9 million (EIA)
 - SMSS increases by \$2,500 per cell
 - Hold harmless to FY 22
- Health Insurance Increase (3.7%)
 - *With the funds that the Department of Education receives for health insurance for school districts, the department shall allocate the funds to school districts proportionately utilizing weighted pupil units. The department shall allocate to districts funds received for retirement benefits through the State Aid to Classrooms formula.*



Budget (Ways & Means)

- Teacher Supply Increase- \$3,033,850 recurring
 - Increased from \$300 to \$350 per teacher
- Bus Driver Salary Increase- 20% -\$17,300,000 recurring
 - *Proviso 117.149 School Bus Driver salary and fringe funding to school districts shall be increased by \$2,500 for FTEs making \$83,000 and under and three percent for FTEs making over \$83,000.*
- CERDEP- \$12,480,883 recurring (\$2.2 Million General Fund and \$10.2 Million EIA)



Budget (Ways & Means)

- Computer Science Education - \$3,000,000 EIA Recurring
- CTE- \$9,500,000 Recurring
 - \$2,750,000 for multi-district career centers
- Instructional Support for Districts (LMS, LOR, and AMS)- \$10,240,000 non-recurring



Budget (Ways & Means)

Capital Funding for Schools-\$120 million non-recurring

- Up to \$20,000,000 for districts that are consolidating with another districts.
- Up to \$10,000,000 of the funds shall be made available to a local school district consolidating at least three schools within a single district into a single school campus and consolidating other district-owned educational buildings or buildings that support district functions into a single building
- Up to \$20,000,000 of the funds shall be made available for the department to allocate to school districts for the purpose of funding facilities upgrades aligned with school safety priorities.
- The remaining funds shall be set aside by the department to create a source of state funding for local school district infrastructure based on need.



Budget (Ways & Means)

- Reading Instruction Assessment for Elementary Teachers-\$300,000 recurring
 - Pilot a reading instruction assessment
- High Intensity Tutoring-\$15,000,000 non-recurring
 - Includes vacation academies
- Literacy Instruction Program -\$42,000,000 non-recurring



Budget (Ways & Means)

- Math Resources and Support (Teach to One)-\$1,822,000 recurring
- Instructional Materials- \$30,000,000 non-recurring
- Bus Purchase/Leases-\$32,597,933 non-recurring EIA and Lottery
- SCDE Agency Systems & Performance Reviews- \$1,000,000



Budget (Ways & Means)

- Projections/SMSS
- Fiscal Impacts
- General Fund Unassigned Fund Balance



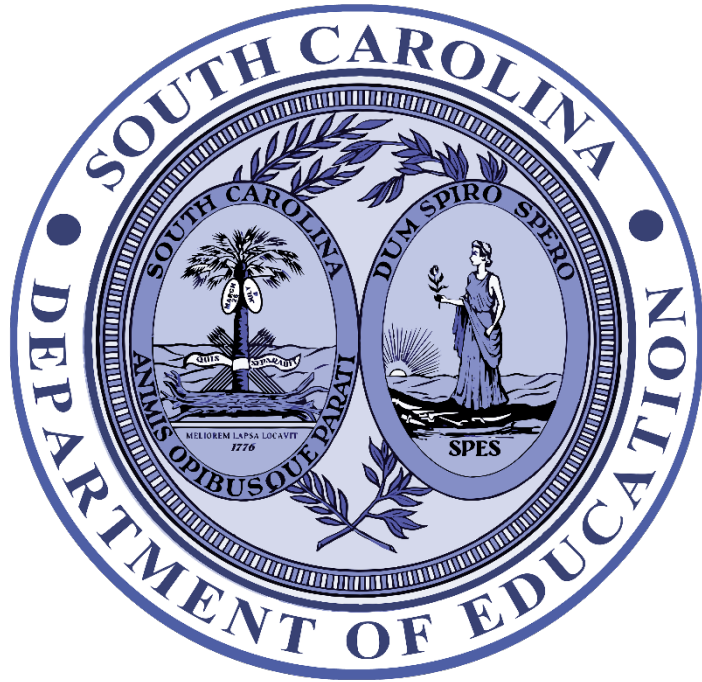
Questions ?





Questions ?





Financial Services

3/9/23

Daniel Haven
Finance Office

PowerSchool & Pupil Accounting Dates

- Pupil Accounting
 - Classify pupils for State Aid to Classroom funding
 - Membership and attendance data
 - 135th Day
 - 3/27/2023 - 4/14/2023



SC Educator- Dates

- Deadline Dates for FY 22-23
 - June 30th - Final Staff updates
 - SC Educator will close for the 2022-2023 school year at 5pm



In\$ite/ESSA

- The Office of Financial Services provided detailed instructions on how to submit your FY22 In\$ite/ESSA data to the SCDE. In\$ite & ESSA reports were due January 16, 2023.
- Proviso Reference: 1.24 & 1A.14 School Districts and Special Schools Flexibility, and 1A.18 Report Card Information



Funding Flexibility

- All transfers must be completed and submitted to SCDE by June 30, 2023
- Flexibility Provisions:
 - At least seventy-five (75) percent of the school district's expenditures must be utilized within the In\$ite categories of instruction, instructional support and non-instructional pupil services
 - must maintain the integrity of the program guidelines as outlined in the Funding Manual



FY 2022 Administrative Cost Reporting

- Districts are to post the Administrative Cost Report to the district website no later than 60 days after the December 1 audit submission deadline
- Reference In\$ite Crosswalk on SCDE website
- Provide Daniel Haven (dbhaven@ed.sc.gov) with a copy of the report or a link to the report on your website



Financial Services Contacts

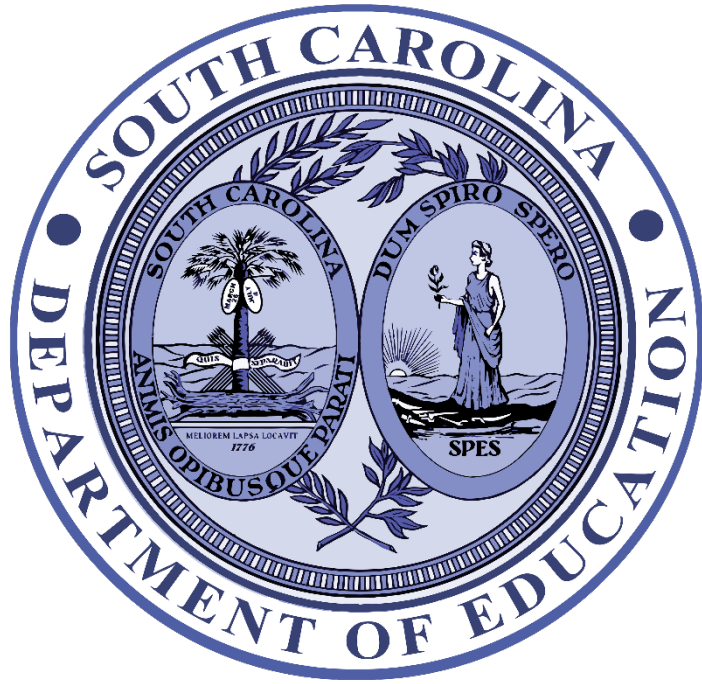
Financial Services Manager

- Melanie Cooper - mcooper@ed.sc.gov 803-734-8135

Fiscal Analyst III

- Michael Scheele- mscheele@ed.sc.gov 803-734-8145





Fiscal Practices

Daniel Haven
3/9/2023

Fiscal Practices Summary

As of March 8, 2023 - 6 Districts on Declaration

- 6 - Watch Status
- 5 - due to audit findings and/or other conditions that the department believes could have a significant effect of the district
- 1 - due to submitting annual audit more than 60 days after the December 1st audit deadline



Fiscal Practices Summary (Continued)

- At least 2 other districts coming on for late annual audits
 - May also be other factors related to declaration once we have an opportunity to review the audit
- All Fiscal Practice information can be found on the Department's website



Reasons for a Declaration of Fiscal Watch

- Audit being submitted more than 60 days after the December 1st deadline
- Ongoing investigation by state and/or federal law enforcement or investigatory agency
- Un-auditable financial records



Reasons for Fiscal Watch (Continued)

- Financial practices noticed outside of acceptable accounting standards
- Identified significant deficiencies, material weaknesses, direct and material legal noncompliance, or management letter comments that the department believes could have a significant effect on the financial condition of the district



Fiscal Practices – Going Forward

- Before a declaration/continued declaration is issued to a district
 - Communication via phone or email that declaration or continued declaration is being discussed
 - District will have opportunity to provide documentation for clarification to committee regarding concerned finding or situation



Any
Questions



Fiscal Practices Contact Information

Daniel Haven, Fiscal Analyst

(803) 734-0721

dbhaven@ed.sc.gov





Grants Accounting Update

3/9/2023

Steven Strother
Finance Office

Reimbursement Process

- **Friday** - Submit claims in order for them to be paid the following Wednesday
- **Monday** - Claims submitted by Friday reviewed and approved
- **Tuesday** - Federal Draw prepared
- **Wednesday** - Payments processed



Claims Deadlines

Expenditure Dates

- Quarter 1 (7/1 - 9/30)
- Quarter 2 (10/1 - 12/31)
- Quarter 3 (1/1 - 3/31)
- Quarter 4 (4/1 - 6/30)

Claims Deadlines

- Due by 11/15
- Due by 2/15
- Due by 5/15
- Due by 8/15

-
- Some grants may require earlier final claims or amendment deadlines - Always refer to GAN



Period of Performance End Date Reminder

- For all Federal subawards active (not yet liquidated) as of October 17, 2022
- Subrecipients will have 90 days after the Period of Performance end date to receive, pay, and claim goods and/ or services obligated by the Period of Performance end date



Period of Performance End Date (Continued)

- Goods and/or services must be *obligated* by the end of the Period of Performance
- Goods and/or services must be paid and claimed based on date of receipt of goods and/or services



Period of Performance End - Example

- Period of Performance end - September 30
- Goods and/or services obligated by September 30



Period of Performance Example (Continued)

- Goods and/or services received by September 30
 - Claimed by November 15 as a 1st Quarter claim
- Goods and/or services received after September 30
 - Claimed by December 30 as a 2nd Quarter claim



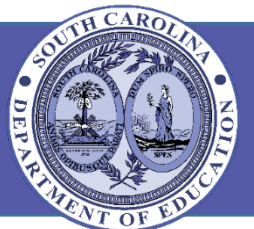
Subawards Close on 90th Day

- Subrecipients should be aware that subawards close on the 90th day after the Period of Performance end date
 - *A full 45 day claiming window may not be allowed*
- *Take into consideration the Accounts Payable cycle of your entity*
 - Invoices may be required submission earlier than the grant close-out date in order to be paid and claimed by that date



Off-Cycle Final Claim Dates

- Be aware of the off-cycle final claims dates that may occur due to Period of Performance end dates
- Final Claim dates may not always fall on 45th day after close of Quarter
- If the Period of Performance end date dictates a different date
- Refer to your GAN *and/or* to the Final Report Date in GAPS



State Grants in GAPS

- 90 day liquidation does not apply to state grants
- Final report date for state grants is 45 days after the grant end date unless otherwise noted on GAN
- Always consult GAN for final claim deadlines, amendment deadlines, etc.
- Some grants have earlier final claims deadlines than the typical August 15th Final Claims date



New Language for Indirect Cost Rate Changes

- For Federal subawards only
- “The negotiated indirect cost rate or the indirect cost allocation plan approved for the subgrantee applies to this subaward”
- Modeled after terms in federal awards to agency
- Apply your approved IDC rate for current year
- To prevent Amendments to subawards (GAN) when subgrantees indirect cost rate changes



SCAPS – Food Service Claims

- Due by the 10th of each month for prior month claims
- Approved by the 15th of the month
- Paid on the 15th of the month



Food Service – Late Claims

- A Final Claim for reimbursement shall be submitted to the State Agency not later than 60 days following the last day of the full month covered by the claim
- Claims not submitted within 60 days shall not be paid with program funds



All Amendments and/or New Budgets - Deadline

- For all grant expenditures that will be incurred on or before June 30, 2023
- Should be *entered* into GAPS by June 30th 2023
 - Unless an earlier deadline is referenced on GAN
- No amendments will be allowed entry into GAPS from July 1, 2023 through August 15, 2023



Amendments for Expenditures in FY24

- Amendment requests/ new budgets for expenditures occurring on July 1, 2023 or after can be entered into GAPS beginning August 16, 2023



Final Claims Deadline

- Expenditure claims submitted to SCDE Finance after August 15, 2023 for expenditures from July 1, 2022 through June 30, 2023 will not be paid
- *Deadline will be strictly enforced*



1st Quarter Claims for FY24

- 1st Quarter claims for FY24 will not be allowed entry until after August 15th, 2023



Reports for Subrecipients

- To monitor Budget, Amendments, Claims
 - Budget Summary and Detail Reports
 - Expenditure Summary and Detail Reports



Budget Detail Report

| Sub Grant Name | Function Code | Object Code | Amendm ent | Amount | Approval Status | Expenditure Amount | Net Budget Balance |
|--|---------------|-------------|------------|-------------|------------------------------------|--------------------|--------------------|
| 20 Title II Supporting Effective Instruction (267) | 224 | 400 | No | \$0.00 | Approved | \$0.00 | \$0.00 |
| 20 Title II Supporting Effective Instruction (267) | 264 | 100 | No | \$4,000.00 | Approved | \$0.00 | \$4,000.00 |
| 20 Title II Supporting Effective Instruction (267) | 264 | 100 | No | \$4,000.00 | Approved | \$0.00 | \$4,000.00 |
| 20 Title IV SSAE (210) | 100 | 400 | No | \$10,800.00 | Approved | \$0.00 | \$10,800.00 |
| 21 Title I Regular (201) | 100 | 400 | Yes | \$4,000.00 | Submitted to Sub Recipient Finance | \$0.00 | \$0.00 |
| 21 Title I Regular (201) | 100 | 400 | Yes | \$5,000.00 | Submitted to Sub Recipient Finance | \$0.00 | \$0.00 |
| 21 Title I Regular (201) | 188 | 400 | No | \$6,043.32 | Approved | \$0.00 | \$6,043.32 |



Budget Summary Report

| Allocation | Budgeted Amount | Unbudgeted Amount | Expenditure Amount | Net Budget Balance | Budget Pending | Expenditure Pending |
|----------------|-----------------|-------------------|--------------------|--------------------|----------------|---------------------|
| \$14,708.07 | \$13,181.00 | \$1,527.07 | \$13,181.00 | \$0.00 | \$0.00 | \$0.00 |
| \$612,068.24 | \$612,068.24 | \$0.00 | \$556,337.34 | \$55,730.90 | \$0.00 | \$8,768.82 |
| \$59,472.34 | \$59,472.34 | \$0.00 | \$33,816.69 | \$25,655.65 | \$10,790.78 | \$0.00 |
| \$4,341,063.00 | \$4,341,063.00 | \$0.00 | \$0.00 | \$4,341,063.00 | \$4,341,063.00 | \$0.00 |
| \$10,000.00 | \$10,000.00 | \$0.00 | \$0.00 | \$10,000.00 | \$10,000.00 | \$0.00 |
| \$89,746.50 | \$89,746.50 | \$0.00 | \$0.00 | \$89,746.50 | \$89,746.50 | \$0.00 |
| \$127,725.95 | \$0.00 | \$127,725.95 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| \$11,406.14 | \$0.00 | \$11,406.14 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |



Expenditure Detail Report

| Sub Grant Name | Function Code | Object Code | Fiscal Quarter | Expenditure Amount | Expenditure Approval Status | Date Submitted To SCDE |
|--|---------------|-------------|------------------|--------------------|-------------------------------|---------------------------|
| 22 Adult Education - Institutionalized | 182 | 200 | 2021 - 22 - [Q4] | \$1,989.04 | SCEIS Document Number | 8/15/2022 2:19:01 PM |
| 22 Adult Education (243) | 182 | 100 | 2021 - 22 - [Q4] | \$60,773.60 | Submitted to Finance Approver | Has Not Submitted To SCDE |
| 22 Adult Education (243) | 182 | 200 | 2021 - 22 - [Q4] | \$22,026.82 | Submitted to Finance Approver | Has Not Submitted To SCDE |
| 22 ARP - IDEA | 100 | 100 | 2021 - 22 - [Q4] | \$14,351.25 | SCEIS Document Number | 8/15/2022 2:14:03 PM |



ESSER Reporting – Quarterly Reports

- Only report funds claimed in GAPS during quarter
- Do not report quarter expense *occurred* in
- Only Quarter in which claim was *submitted* in GAPS
- Example - claim *submitted* between January 1, 2023 and March 31
 - Reported by the April 5 report due date



ESSER Reporting – Quarterly Reports

- Required to submit quarterly report for each ESSER grant still open
 - even if no claims for that grant were submitted during the quarter
- If there are no expenditures to report for ESSER II or III during the quarter, simply indicate on the report “0”



ESSER Reporting Requirements

- Online ESSER quarterly report forms on the ESSER webpages
- ESSER II: [ESSER II Funding Information](#)
- ARP ESSER: [ARP ESSER Funding Information](#)



SAM.gov Reminder

- All school districts must maintain an active registration in the federal System for Award Management ([SAM](#)) to receive federal funds
- Must be renewed annually *before it expires* so that the registration does not lapse



GovGrants®

- Currently in a state of Contract discussion
- Programmatic and Finance issues
- Assure that we all have the best product possible

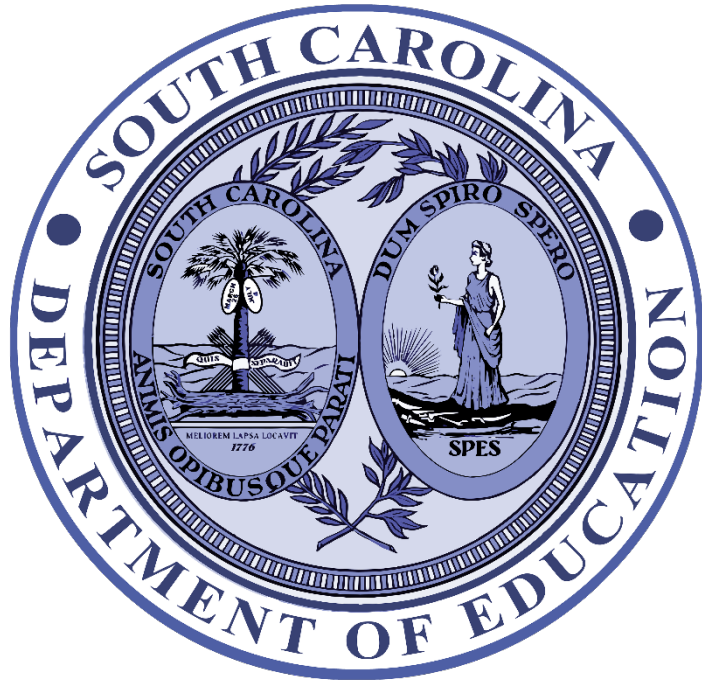


What to do

- Continue to use GEMS and GAPS for Budgeting, Claims, Etc.
 - Until Issues are resolved
 - Another RFP
 - Build internal system that will combine the necessary functions







New Funding Formula and LEA Level Maintenance of Effort (MOE)

Steven Strother
3/9/2023

IDEA MOE

- State and local fund revenue is combined in the LEA's General Fund (GF)
- Difficult to identify expenditures as state or local



Old Formula: Determining Local or State

- Total State/Local expenditures for Special Education (SPED) in GF SPED Functions
 - *Minus*
 - Revenue to LEA through SPED *State Funding* Categories
- = Total Local *Expenditures*



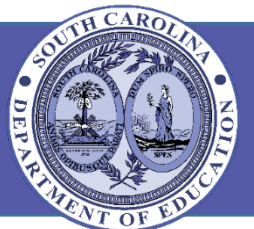
Revenue and Function Reference (Old Method)

| Description | | Revenue | Function |
|--------------------------------|-----|----------------|-----------------|
| Trainable Mentally Handicapped | TMH | 3315 | 122 |
| Speech Handicapped | SH | 3316 | 126 |
| Emotionally Handicapped | EH | 3321 | 128 |
| Educable Mentally Handicapped | EMH | 3322 | 121 |
| Learning Disabilities | LD | 3323 | 127 |
| Hearing Handicapped | HH | 3324 | 125 |
| Visually Handicapped | VH | 3325 | 124 |
| Orthopedically Handicapped | OH | 3326 | 123 |
| Autism | AU | 3331 | 161 |
| Preschool Handicapped | | | 131-138 |



IDEA MOE and New Funding Formula

- Challenges
 - Determining State and Local Expenditures related to Special Education
 - Student weightings are no longer designated by special education categories
 - Difficult for LEAs to maintain Effort with Local Only methods (Total Local and Local Per-Capita)
 - No way to reset previous MOE calculations when state funding methods change



Determining the Best Method of IDEA MOE

- SCDE sought Technical Assistance from the Center for IDEA Fiscal Reporting (CIFR)
- SCDE will reconvene a small group of CFOs to finalize a recommendation
- SCDE will then meet with LEAs to review determined method
- SCDE will hold session at Fall SCASBO Conference



Local Share Percentage as Local Expenditures

- Consider Local Share Percentage as Local Expenditures
- Multiply Local Share % by Total amount of GF expenditures in SPED functions to determine Local Amount
- See following example



Example

| Child Count | 1449 | LEA Name | | | |
|--|------|-----------------|------------------------------|-----------------|------------------------|
| Compliance Standard - Fiscal Year 2021-2022- LEA Effort - Final Expenditures | | | | | |
| | | | 2021-2022 Final Expenditures | | |
| Object Description | Code | Total | Local (26.24%) | State | State and Local |
| Educable Mentally Handicapped | 121 | \$ 710,726.65 | \$ 186,494.67 | \$ 524,231.98 | \$ 710,726.65 |
| Trainable Mentally Handicapped | 122 | \$ 585,299.79 | \$ 153,582.66 | \$ 431,717.13 | \$ 585,299.79 |
| Orthopedically Handicapped | 123 | \$ 691,313.36 | \$ 181,400.63 | \$ 509,912.73 | \$ 691,313.36 |
| Visually Handicapped | 124 | \$ 86,699.00 | \$ 22,749.82 | \$ 63,949.18 | \$ 86,699.00 |
| Hearing Handicapped | 125 | \$ 60,456.43 | \$ 15,863.77 | \$ 44,592.66 | \$ 60,456.43 |
| Speech Handicapped | 126 | \$ 1,233,018.59 | \$ 323,544.08 | \$ 909,474.51 | \$ 1,233,018.59 |
| Learning Disabilities | 127 | \$ 3,490,280.83 | \$ 915,849.69 | \$ 2,574,431.14 | \$ 3,490,280.83 |
| Emotionally Handicapped | 128 | \$ 607,502.33 | \$ 159,408.61 | \$ 448,093.72 | \$ 607,502.33 |
| Preschool Handicapped Child 5/6 | 133 | \$ 362,919.48 | \$ 95,230.07 | \$ 267,689.41 | \$ 362,919.48 |
| Preschool Handicapped | 137 | \$ 704,695.13 | \$ 184,912.00 | \$ 519,783.13 | \$ 704,695.13 |
| Autism | 161 | \$ 187,614.03 | \$ 49,229.92 | \$ 138,384.11 | \$ 187,614.03 |
| Psychological | 214 | \$ 939,374.62 | \$ 246,491.90 | \$ 692,882.72 | \$ 939,374.62 |
| | | | | | \$ - |
| | | | | | \$ - |
| Grand Totals | | | \$ 2,534,757.82 | | \$ 9,659,900.24 |
| Per Capita Amounts | | | \$ 1,749.32 | | \$ 6,666.60 |



Additional Tab to LEA MOE Calculator

- Propose additional tab added to LEA MOE Calculator
- Include each districts Local Share Percentage
- Method is standardized and auditable



Upcoming Eligibility and Compliance

- MOE *Eligibility* for FY24 - Due June 2023
 - Eligibility will test FY24 Budget (New Formula) to prior Actuals
 - LEAs should meet without Local Only calculation (If new method is not available)
- MOE *Compliance* for FY23 - Due in January 2024 using FY23 Audited figures
 - First *Compliance* Calculator under New Funding Formula
 - Agreed upon method must meet audit compliance



Food Service Fringe and Indirect Cost

- Proviso 1.5
- 1.5. (SDE: Employer Contributions/Allocations) It is the intent of the General Assembly that the appropriation contained herein for “Public School Employee Benefits” shall not be utilized to provide employer contributions for any portion of a school district employee’s salary that is federally funded.
- State funds allocated for school district employer contributions must be allocated by the formula and must be used first by each district to cover the cost of fringe benefits for personnel required by the Defined Program, food service personnel and other personnel required by law. Once a district has expended all state allocated funds for fringe benefits, the district may utilize food service revenues to fund a proportionate share of fringe benefits costs for food service personnel.



New Funding Formula and Proviso 1.5

- No State Aid to Classrooms - Fringe Benefits Employer Revenue Stream in New Funding Formula
- Currently considering what calculations might be necessary with New Funding Formula
- SCDE will provide guidance shortly



MOEquity Update

- Updates, due dates, etc. for MOEquity reporting will be forwarded to finance officers via email



Proviso 1.3 Reminder

- According to Proviso 1.3 - each school board of trustees must make available by September first each school year its annual budget
- budget shall include an itemized list of the average salaries
- The budget must be available on the district's website



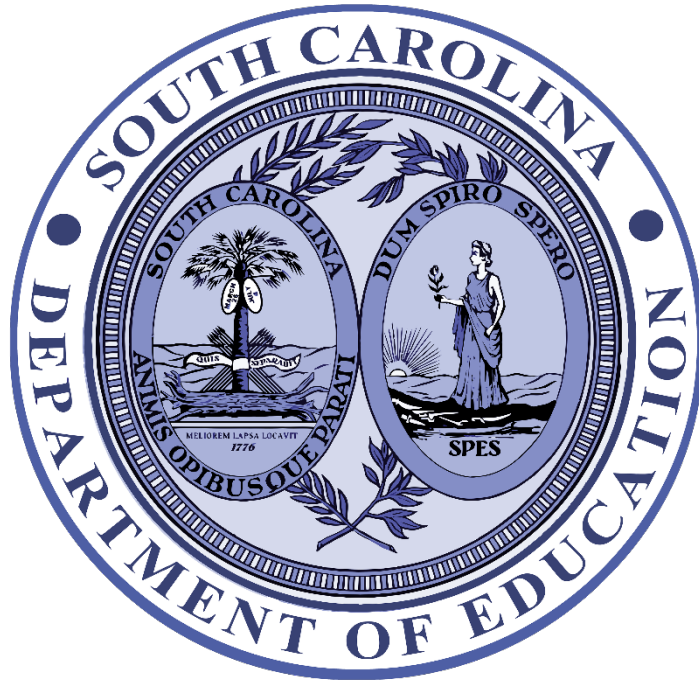
Proviso 1.3 (Continued)

- Use the template provided by SCDE to record approved General Fund Budget in the categories provided and post the information to your website by September 1st
- Once posted, send the link to the posting to Daniel Haven at dbhaven@ed.sc.gov



Any
Questions





SCASBO 2023 Spring Conference

Office of Auditing Services Update

March 9, 2023
Melissa A. Myers
Director, Office of Auditing Services

Topics

- Status of LEA Annual Audit Submission
- Penalties for Late Audit Submission
- LEA Desk Reviews
- Subrecipient Risk Assessment
- External Audits in Progress
- Time and Effort



Status of LEA Audit Submission



Status of Annual Audits

- Audits for FY 2021-22 were due on December 1, 2022
- Seven districts did not submit timely audits and received correspondence from the State Superintendent
- Four districts still have not submitted an audit report



Penalties for Late Audit Submission



Penalties for Late Audit Submission

- Submission of the audit report more than 60 days after the deadline will automatically result in a district being placed in a fiscal practices designation of at least fiscal watch (January 31 or later)
- Submission of the audit report more than 30 days late will result in the district being rated as high risk for the audit submission criteria in the annual subrecipient risk assessment process (January 1 or later)



Penalties for Late Audit Submission

- Submission of the audit report after December 1 but within 30 days of the due date (on or before December 31) will result in a medium risk rating for the district for the audit submission criterion on the annual subrecipient risk assessment



Notice of Late Audit Submission

- Correspondence was distributed from the State Superintendent of Education to the district superintendent for audits not received timely. The district CFO and school board chair were copied on the letter.



LEA Desk Reviews



LEA Desk Reviews

- The Office of Auditing Services performs desk reviews on a sample of audit reports received each year.
- Federal award findings are forwarded to the program office to provide a management decision. Program offices will contact districts to determine status of corrective actions for findings noted and may request support documentation to show that the findings have been corrected.



LEA Desk Reviews

- A close-out letter will be issued to the district superintendent, chief financial officer, and the independent auditor will be copied. Letters are issued within six months of acceptance of the audit report through the Federal Audit Clearinghouse.



Subrecipient Risk Assessment



Subrecipient Risk Assessment

- We are currently rating subrecipients for FY 2021-22.
- For this year's assessment, we will consider if the district's System for Award Management registration expired during the fiscal year and rate districts accordingly in the "Other Material Factors" criterion if there was an expired registration during the fiscal year.
- School business officials will be given a "heads up" if the score is medium risk or high risk prior to the official letter going out.



Subrecipient Risk Assessment

- Based on total risk score, LEAs are identified as high, medium, or low risk
 - 9-18 Low risk
 - 19-29 Medium risk
 - 29+ High risk
- Risk scores will also be used to make federal award grant decisions for discretionary awards and to determine if any additional levels of state support would be required through the award period.



Subrecipient Risk Assessment

- Ensure that your district's federal program director is listed in DEIM so that they will be copied on the correspondence
- Notification will come directly from the State Superintendent's Office for high risk districts
- Risk scores should be issued no later than April 2023



External Audits in Progress



External Audits in Progress

- ESSER I and II Monitoring Reviews
 - 21 ESSER I monitoring reviews have been completed
 - Three additional districts are in the process of being monitored for ESSER I
 - ESSER II monitoring visits are in progress for eight LEAs
- Limited Scope Audits - audits of district's use of funds subgranted by the SCDE
- State Audits - in progress for two LEAs



Other Audits in Progress

- Transportation audits



ESSER and Vehicle Purchases

- SCDE Office of Emergency Programs has noticed an increase in requests by districts to purchase vehicles using ESSER funds
- Period of availability to spend ESSER II funds ends on September 2023; period of availability to expend ARP ESSER funds ends on September 2024
- Due to limited time remaining to expend ESSER funds, SCDE's position is to approve vehicle leases and not vehicle purchases; Cost must be necessary, reasonable, and allocable



ESSER and Vehicle Purchases

- If your district has already purchased a vehicle with ESSER funds, ensure that proper support (mileage logs, etc.) is maintained to document the use



Time and Effort



Time and Effort

- Employees who work in whole or in part on a federal cost objective must complete time and effort documents
- Part D of the SCDE Assurances state that the applicant “will also comply with the Office of Management and Budget 2 CFR Part 200 Subpart 2 - Cost Principles related to the allowability, reasonableness, and allocability of costs consistent with the approved budget and also by maintaining required support for salaries and wages. Required support includes certification and/or personnel activity records depending upon the amount of time spent on cost objectives.



Acceptable Forms of Time and Effort Documentation

- Monthly Personnel Activity Report (PAR)
- Timesheet that meets requirements of a PAR
- Blanket semi-annual certification
- Individual semi-annual certification

* Time and effort documents must be completed after-the-fact!



Time and Effort

- If an employee's salary is fully supported by one federal cost objective, a semi-annual certification is required.
- If an employee's salary supports more than one cost objective, a Personnel Activity Report (PAR) is required.
- A timesheet can be a PAR if all required elements for both documents are present.



Time and Effort

- Contractors paid with federal funds are not required to maintain time and effort documentation



SCDE Guidelines for Retaining Documentation to Support Expenditures

- The SCDE Guidelines for Retaining Documentation to Support Expenditures provides examples of various acceptable time and effort documents
- <https://ed.sc.gov/finance/auditing/manuals-handbooks-and-guidelines/guidelines-for-retaining-documentation-to-support-expenditures/guidelines-download/>



SCDE Guidelines for Retaining Documentation to Support Expenditures

- A timesheet may be a PAR if all of the required elements of the PAR are present on the timesheet. The timesheet is then considered a multi-purpose record. This time & effort information should contain the following elements in order to be considered a multi-purpose record:
 - i. Grant Number and/or Grant Name (Cost Objective)
 - ii. Employee's Distribution (%) of time between each grant award or cost objective
 - iii. Employee's Full Name
 - iv. Employee's Position



SCDE Guidelines for Retaining Documentation to Support Expenditures

- Timesheet as a PAR (continued)
 - v. Specific Dates (*i.e., daily & work week ending*)
 - vi. Specific Times (*i.e., time/in & time/out*)
 - vii. Calculation of Time Worked (*i.e., daily & work week ending*)
 - viii. Calculation of Other Time (*i.e., Sick, Vacation, Holiday*)



SCDE Guidelines for Retaining Documentation to Support Expenditures

- Timesheet as a PAR (continued)
 - ix. Employee's Signature and date
 - x. Supervisor's or Approving Agency Official's Signature and date



PAR Only Requirements

- Grant Number and/or Grant Name (Cost Objective)
- Employee's Distribution (%) of time between each grant award or cost objective
- Employee's Full Name
- Employee's Position



PAR Only Requirements (continued)

- Calculation of Time Worked (Daily, Monthly)
- Calculation of Other Time (*i.e., Sick, Vacation, Holiday*)
- Employee's Signature and date
- Supervisor's or Approving Agency Official's Signature and date



Individual Semi-Annual Certification Requirements

- Completed for a six-month period
- Signed and dated by the employee and the supervisor or someone with first-hand knowledge of the work performed
- Certification statement should state that the employee worked 100% of his/her time on what specific federal program



Blanket Semi-Annual Certification

- Completed for a six-month period
- Lists all employees who work in the same specific federal cost objective
- Certification statement should state that the listed employees worked 100% of their time on what specific federal program
- Signed and dated by the supervisor or other approving official with first-hand knowledge of the work performed



Questions Received

- Q1 - Can we submit PARs from our HR department?



Questions Received

- A1 - This depends on your district's procedure. If your district requires all PARs to be forwarded to your HR department first, we can accept the PARs from HR as long as the required employee and supervisor signatures are present. Although HR may know how your salary is budgeted, PARs should not be approved by HR but should be approved by the employee's supervisor, unless someone in HR is the employee's supervisor. Time and effort documents must be completed after-the-fact.



Questions Received

- Q2 - Can we review how to document stipends that are paid out of Title I, Title II, and ESSER?



Questions Received

- A2 - A blanket certification can be used to list all employees being paid a stipend out of federal funds. A separate blanket certification should be used for each cost objective.



Questions Received

- Q3 - If a non-federally paid employee is working an afterschool program under federal funds, would they be able to sign a semi-annual certification because they are working 100% of the after school time in the federal program?



Questions Received

- A3 - A semi-annual certification for just the portion of time worked for the after-school program will suffice. The certification could include the hours worked for the afterschool program.

(I, Melissa Myers, certify that for the months of January through June 2023 between the hours of 3:00 p.m. and 6:00 p.m., I worked solely for the 21st Century program).

- A blanket certification listing all employees working for the program is also allowable.



Questions Received

- Q4 - What is the simplest way to be in compliance with the law, especially for hourly stipends (afterschool, summer, PD on off-contract days)? Are there specific forms that we can or must use? How much documentation is actually required for this? Our payroll system isn't something I have access to in order to print any time records. Auditors would need to request this from Finance and/or Payroll.



Questions Received

- A4 - An individual or blanket semi-annual certification is recommended for these scenarios.



Questions Received

- Q5 - What about substitutes? Not sure how we would possibly gather forms for those subs every single day if that is something that is required. For subs, our external auditors have asked for semi-annual certifications for these. I put a note that the person is a sub so we don't have a form for them. I've never been told that is a problem.



Questions Received

- A5 - If substitutes are contracted through a temporary agency, they do not have to complete time and effort documents. However, if the substitute teachers are paid through a salary account(object code 100) and as an employee, time and effort is required. A timesheet that meets the requirements of a PAR can be completed for each day worked that was paid through a federal cost objective.



Questions Received

- Q6 - Can you provide access to updated documentation templates/examples?



Questions Received

- A6 - Updated examples will be posted in the SCDE Guidelines Memo at <https://ed.sc.gov/finance/auditing/manuals-handbooks-and-guidelines/guidelines-for-retaining-documentation-to-support-expenditures/guidelines-download/>
- An e-mail would be sent to program officers to share the memo with subrecipients



Questions Received

- Q7 - In regards to the blanket semi-annual certification, would it be employees in a single cost center or all employees paid under the same funding source?



Questions Received

- A7 - If all employees in a single cost center support the same federal cost objective, the blanket semi-annual certification is allowable.



Additional Questions?



Contact

Melissa Myers, Director, CSBO
Office of Auditing Services
(803) 734-8453
mmyers@ed.sc.gov

Hershula Davis, Audits Manager, CSBO
Office of Auditing Services
(803) 734-6022
hdavis@ed.sc.gov

