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DEPARTMENT OF EDUCATION
LANSING

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PUBLIC INSTRUCTION

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MEMORANDUM

TO: Local and Intermediate School District Superintendents and
Public School Academy Directors

FROM: Sally Vaughn, Ph.D. *Sally*
Deputy Superintendent and Chief Academic Officer
Carol Wolenberg
Deputy Superintendent

SUBJECT: Clarification Regarding Semi-Annual Certifications, Split-Funded Personnel
and Personnel Activity Reports for Federal Funds

The Michigan Department of Education (MDE) is revising the memorandum "Clarification Regarding Semi-Annual Certifications, Split Funded Personnel and Personnel Activity Reports for Federal Funds" that was sent on February 15, 2012.

This guidance on required time distribution documentation was intended to clarify requirements on monthly Personnel Activity Reports or Semi-Annual Certifications for future implementation.

This revision also is included in the attachment in bold type.

The Michigan Department of Education is working on further clarification regarding when to use a monthly Personnel Activity Report or a Semi-Annual Certification across all offices and programs. When this guidance is developed we will announce it in a weekly Thursday message. LEAs may want to wait for this guidance clarification, coming soon, to make changes to your procedures.

Questions regarding this revision can be addressed to Mike Radke, Director of the Office of Field Services, by emailing him at radkem@michigan.gov or calling him at 517-373-3921.

Attachment

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Clarification Regarding Semi-Annual Certifications, Split-Funded Personnel and Personnel Activity Reports for Federal Funds

The Office of Field Services (OFS), in the Michigan Department of Education (MDE), is clarifying compliance requirements related to time and effort reporting. Nationwide attention from USED has increased related to administrative and internal controls. These controls and practices are a condition for receiving federal funds. One area of focus is on time distribution, Personnel Activity Reports (PARs) and semi-annual certifications. The most prevalent single audit exception reported to the Michigan Department of Education is on PARs and semi-annual certifications.

This guidance on required time distribution documentation is intended to clarify requirements on monthly Personnel Activity Reports (PARs) or semi-annual certifications for future implementation.

It has come to the attention of the MDE Office of Field Services that there is confusion regarding documentation LEAs are required to keep to comply with single audits of federal funds. Semi-annual certifications are required for staff 100% federally funded.

OMB Circular A-87 requires that when employees are expected to work solely on a single federal award or cost objective, charges for their salaries will be supported by periodic certifications that these employees worked solely on that program for the semi-annual period covered by the certification. These certifications must be prepared at least semi-annually and be signed by the employee or a supervisor with first-hand knowledge of the work performed by the employee. If a supervisor has first-hand knowledge of work performed by several employees each working on a single cost objective, the supervisor can use a blanket certification that lists all of the employees, the program they worked under, and the period covered; one supervisory signature would be adequate for a blanket certification. These certifications must be updated annually and match current staffing lists.

PARs are required for split funded staff (federal funds plus general funds, Section 31a, etc.).

OMB Circular A-87 states acceptable methods for multiple cost objective staff include written schedules if they are documented by personnel activity reports (PARs) confirming that the schedules were followed (e.g.,

directors, secretaries, counselors). The PARs must be prepared at least monthly, be signed and dated by the employee, and account for the staff person's total activity for all pay periods. Timesheets and other records should be completed after the fact. Employees should never guess the amount of hours they will spend on federal programs before work is actually performed.

Instructional staff may no longer use their lesson plans to confirm their written schedules. LEAs using lesson plans to confirm written schedules must now use PARs. Lesson plans may be used as part of the documentation to support PARs.

The LEA is responsible for maintaining all required documentation related to federal funds received. We recommend that you work closely with your OFS consultant to minimize audit findings.

NOTE: LEAs that have been approved to pilot Schoolwide Consolidation may be eligible to engage in slightly different timekeeping practices than those described in this memorandum.

Please review the examples and forms attached to this memorandum. For clarification or questions, please contact your OFS consultant or call the Office of Field Services at 517-373-4588 to be directed to your consultant.

EXAMPLES OF SEMI-ANNUAL CERTIFICATIONS

Examples of staffing where semi-annual certification is appropriate are fully federally funded Title I, Part A paraprofessionals that do not perform general fund or Section 31a At Risk duties or fully federally funded supplementary elementary (K-3) class size reduction teachers.

Staff members hired for a fully federally funded Title I, Part A summer school are required to have a separate certification for that time period. (See original memo for sample forms)

EXAMPLES OF PERSONNEL ACTIVITY REPORTS (PARS)

PARs are required for split funded staff (e.g., federal funds plus general funds, or federal and Section 31a). The State of Michigan Section 31a At Risk funds cannot be considered as part of a single cost objective for a Schoolwide School program because of the differing eligibility requirements.

An instructional coach paid under Title II, Part A assigned 50% of the time to the classroom as a teacher under Title I, Part A must complete a PAR that documents 50% of the time coaching other instructional staff as separate from the instructional teaching time.

A Title I, Part A teacher who also works as a teacher for eligible students under Section 31a must also complete PARs. Section 31a student eligibility must be reflected in the report.

PARs and semi-annual certifications must reflect 100% of the time employees worked. It is not acceptable to hire a person 50% under general funds and 50% under Title I, Part A and only complete a semi-annual certification for 50% of the time worked. The employee needs to complete a PAR for 100% of their time. (See original memo for sample forms)