

“Grantees and Contractors are hereinafter referred to as Contractor.”

Documentation of staff time and effort is required for all staff receiving Federal awards inclusive of the prime contractor, subcontractors, and consultants who are devoting their time to the Nutrition Education and Obesity Prevention Branch (NEOPB), Supplemental Nutrition Assistance Program Education (SNAP-Ed) Program.

600.1 Documentation of Staff Time and Effort

Documentation of personnel expenses for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- a) be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated; and
- b) reasonably reflect the total activity for which the employee is compensated, not exceeding 100% of compensated activities.

If a system of internal control does not fulfill the stated requirements, then the following time and effort methods outlined in 600.2 and 600.3 must be followed:

600.2 Staff Devoting 100 Percent of Time to SNAP-Ed

Semi-Annual Certificate of Activity

All staff devoting 100 percent FTE to NEOPB SNAP-Ed must complete a Semi-Annual Certificate of Activity form (Appendix 13) twice a year. This form must be signed and dated directly after the reporting period by both the employee and supervisor; after-the-fact reporting is unacceptable.

600.3 Staff Devoting less than 100 Percent of Time to SNAP-Ed

All staff devoting less than 100 percent FTE to NEOPB SNAP-Ed are required to complete a bi-weekly time and effort method to document and allocate personnel time spent on allowable SNAP-Ed activities. There are two methods available for use:

1. NEOPB Bi-Weekly Time Log:

A NEOPB Bi-Weekly Time Log (BWTL) (Appendix 10) form is required for any staff devoting less than 100% FTE to SNAP-Ed. The BWTL must include the SNAP-Ed program hours worked, either as direct delivery, administrative, or physical activity, as well as prorated paid time off. The BWTL for each reporting period is available on the NEOPB website.

<http://www.cdph.ca.gov/programs/cpns/Pages/WeeklyTimeLogs.aspx>

2. Quarterly Time Study:

A Quarterly Time Study (QTS) (Appendix 11) may be used as an alternate method. A written justification that provides a reasonable assurance of accuracy of the time estimate must be submitted annually with the Plan to the United States Department of Agriculture (USDA) for approval prior to implementation. The QTS requires individual employees to record their activities every day for one month per quarter. The total time recorded for the month is then projected across the remaining two months of the quarter. No additional timekeeping is required within the given quarter. The month for each quarter is rotated for subsequent quarters (e.g., the first month of the first quarter, the second month of the second quarter, the

third month of the third quarter, and the first month of the fourth quarter).

The QTS is not appropriate if the organization does not have evenly distributed personnel costs. For example if the Contractors program activities are grouped into one or two weeks of a quarter, it is not reasonable and necessary to keep a record of all time spent on the program during those two weeks and project the recorded hours over the remaining weeks that normally have little or no activity. In addition, school districts with several weeks of summer or off-track vacation weeks with little or no activities should not use the QTS.

600.4 Reporting of Absences, Vacation and/or Leave

Paid absences, vacation, and/or leave being reimbursed with SNAP-Ed funds must be reported on the automated system, NEOPB BWTL or QTS. For staff less than 100% FTE, the leave time must be prorated based on the FTE for the employee. Absences, vacation and other leave time not invoiced to NEOPB should not be reported on the automated system, BWTL or QTS.

600.5 Supervisor Signatory Authority for Time Records

The authority signatory on the automated system, BWTL, QTS, or Semi-Annual Certificate of Activity form should have direct knowledge of the staff's SNAP-Ed activities and the agency authorizes the person to sign. The signatory does not need to be a supervisor; that means the Project Director may sign the documents. However, the Project Director cannot be the authority signatory on their own time record document.

600.6 Time Reporting Method and Record Retention

The time reporting method must be in increment of hours and not percentages of time spent on SNAP-Ed activities. The time documents must be completed, signed, and dated by the employee contributing time, based upon actual hours worked for NEOPB SNAP-Ed Program activities. The documents must be signed and dated by a supervisor or designee who can verify the time recorded. The signed and dated document must be maintained on file at the Contractor's office for up to three years after the end of the agreement term and must be available for fiscal review.