

# EDGAR 101: Intro to EDGAR

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## Agenda

1. Overview of EDGAR
2. Financial and Program Management
3. Procurement
4. Timely Spending and Allowable Costs
5. Documentation

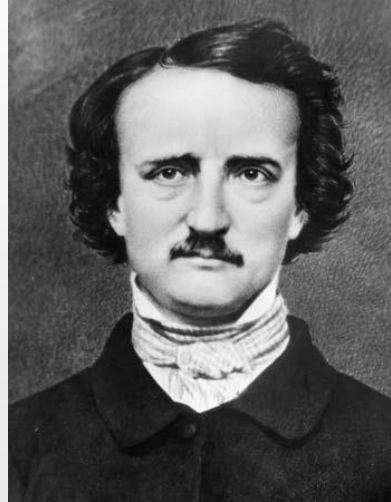


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## Who Is EDGAR?

### **Education Department General Administrative Regulations**

<https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>



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## EDGAR and the UGG

- Includes various grants management rules applicable to all federal awards issued by the U.S. Department of Education (ED).
- The Uniform Grant Guidance (UGG) are federal grants management rules that apply to all awards issued by all federal awarding agencies.
  - Created and amended by the Office of Management and Budget (OMB)
- EDGAR incorporated the UGG back in 2014
  - Parts 74 and 80 of EDGAR were replaced with 2 CFR Part 200

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## Key Sections of EDGAR

- Title 34
  - Part 75 – Direct Grant Programs
  - Part 76 – State-Administered Programs
  - Part 77 – Definitions
  - Part 81 – Enforcement Regulations
- Title 2
  - Part 200 – Cost/Administrative/Audit Rules
  - Part 3485 – Non-procurement Debarment and Suspension
  - Incorporates 2 CFR Part 180, OMB's Guidelines on Debarment and Suspension



## Uniform Guidance Rules

2 CFR Part 200

## Federal rules:

- Program statute
- Program Regulations
- 2 CFR Part 200
- Guidance Documents

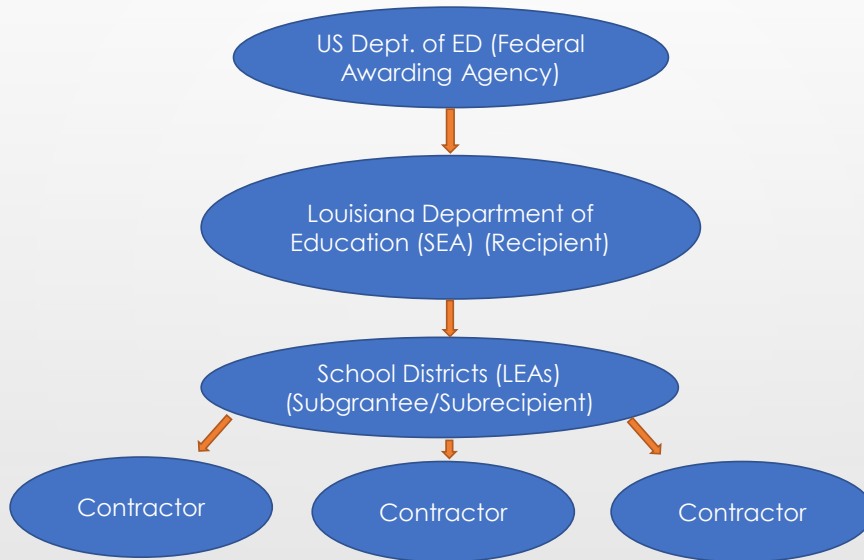


## State and local rules:

- State statute
- State regulations
- State policies
- Local rules
- Policies and procedures

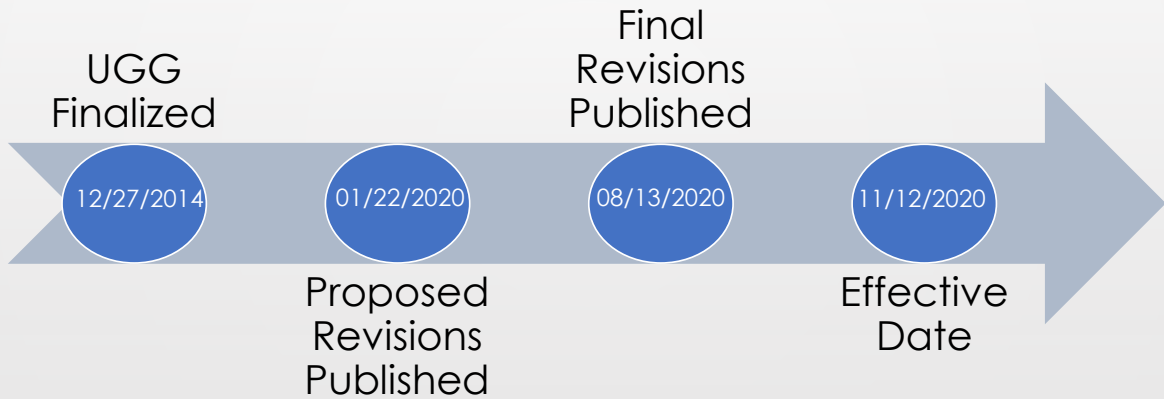
## Common terms

Term	Definition
Contractor	An entity that receives a contract to provide goods or services
Federal Agency	Any agency as defined in 5 USC 551(1)
Non-federal entity	A state or local government, Indian tribe, institute of higher education, or nonprofit organization that carries out a federal award
Pass-through entity	A non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program
Recipient	An entity that received an award directly from a federal awarding agency
Subrecipient	An entity that receives a subaward from a pass-through entity



An entity that receives multiple grants may be a recipient, a subrecipient, and a contractor at the same time

## OMB Revises the UGG



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## OMB Revisions to the UGG – Effective Dates

- Final Revisions published August 13, 2020
- **Effective as of November 12, 2020**
- Except for 200.216 and 200.340, **effective August 13, 2020**
  - 200.216: Prohibition on certain telecommunications and video surveillance services or equipment
  - 200.340: Termination
- **NEW!** OMB Updated FAQs May 3, 2021:  
<https://www.cfo.gov/assets/files/2CRF-FrequentlyAskedQuestions>

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## 2 CFR Part 200

- Subpart A – Definitions – 200.1
- Subpart B – General Provisions
- Subpart C – Pre- Federal Award Requirements
- Subpart D – Post Federal Award Requirements
- Subpart E – Cost Principles
- Subpart F – Audit Requirements

## Subpart A - Definitions 2 CFR 200.1

- Notable changes:
- Definitions
  - Added:
    - "Budget period"
    - "Micro-purchase Threshold"
    - "Renewal award"
  - Revised:
    - "CFDA number" → "Assistance Listings"
    - "Compliance supplement"
    - "Obligations" → "Financial Obligations"
    - "Improper payment"
    - "Period of Performance"
    - "Simplified acquisition threshold"

## Information included in a Federal Award

- Performance goals
- General award information
- General terms and conditions
- Awarding agency or program conditions
- Specific conditions (if applicable)

## Specific Conditions – 200.208

- The Federal awarding agency or pass-through entity may adjust specific Federal award conditions as needed
- Additional Federal award conditions may include items such as the following:
  1. Requiring payments as reimbursements rather than advance payments;
  2. Require evidence of acceptable performance within a given performance period before allowing the next phase to begin;
  3. Requiring additional, more detailed financial reports or project monitoring;
  4. Requiring the non-Federal entity to obtain technical or management assistance;
  5. Establishing additional prior approvals.



## Specific Conditions – 200.208

- If the Federal awarding agency or pass-through entity is imposing additional requirements, they must notify the applicant or non-Federal entity as to:
  1. The nature of the additional requirements;
  2. The reason why the additional requirements are being imposed;
  3. The nature of the action needed to remove the additional requirement, if applicable;
  4. The time allowed for completing the actions if applicable; and
  5. The method for requesting reconsideration of the additional requirements imposed.
- Any additional requirements must be promptly removed once the conditions that prompted them have been satisfied.

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## Financial and Program Management

2 CFR 200.302(b)

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## Financial Management – 200.302(a)

- States follow state accounting law and procedure
- State financial management systems must contain sufficient detail to:
  - Document compliance with federal statute, regulation, and grant terms and conditions
  - Prepare required reports
  - Adequately trace expenditures

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## Financial Management 200.302(b)



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## Internal Controls 200.303

### MUST:

- Comply with requirements (**U.S. Constitution**)
- Evaluate and monitor compliance
- Take prompt action to correct noncompliance
- Safeguard personally identifiable information (PII)
- Compliance Supplement, Internal Controls: "Control activities are the policies and procedures that help ensure the management's directives are carried out."
  - Clearly written and clearly communicated

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## Federal Payment 200.305(b)

Written procedures must describe whether non-federal entity uses:

- 1) Advance Payments
  - Limited to minimum amounts needed to meet immediate cash needs
  - Subject to cash management requirements
- 2) Reimbursement
  - Pass through must make payment within 30 calendar days after receipt of the billing
  - Initial payments made with state/local funds

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## Cash Management 200.305 (a) and (b)

- For non-federal entities, payments must minimize time elapsing between draw down and disbursement (not obligation)
- Cash advances must be maintained in insured accounts
- Accounts must be interest bearing unless:
  1. Aggregate federal awards under \$120,000
  2. Account not expected to earn in excess of \$500 per year
  3. Bank require minimum balance so high, that such account not feasible
- Interest earned must be remitted annually to HHS Payment Management System (**updates to this process**)
  - Interest amounts up to \$500 may be retained by non-federal entity for administrative purposes.

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## Procurement

2 CFR 200.317 – 200.327

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## Procurement – Common Findings



Failure to comply with established procedures



Inadequate justification of the procurement of professional services not subject to competition



Establish controls to ensure staff involved in the procurement processes follow established requirements, and provide training as applicable.

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## Procurement Standards 200.318

- All nonfederal entities must have documented procurement procedures which reflect applicable Federal, State, and local laws and regulations.
  - Open and Full Competition (Maximum Extent Possible)
  - Specific Thresholds for Purchasing
  - Prohibited In-State and Local Preferences
  - Contract Administration System
  - Conflict of Interest Rules
  - Mandatory Disclosures

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## Contract Administration 200.318(b)

- Nonfederal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of the contract

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## Conflict of Interest 200.318(c)(1)

- Must maintain written standard of conduct, including conflict of interest policy.
- A conflict of interest arises when any of the following has a financial or other interest in the firm selected for award:
  - Employee, officer or agent
  - Any member of that person's immediate family
  - That person's partner
  - An organization which employs, or is about to employ, any of the above or has a financial interest in the firm selected for award
- Organizational Conflict (applies to non-gov entities)

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## Conflict of Interest 200.318(c)(1) (cont.)

- Must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors / subcontractors.
- However, may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value.
- Standards of conduct must include disciplinary actions applies for violations.



## Conflict of Interest 200.112 Mandatory Disclosures 200.113

- All non-federal entities must establish conflict of interest policies and disclose in writing any potential conflict to federal awarding agency in accordance with applicable Federal awarding agency policy.
- Must disclose to federal or pass-through agency "all violation of federal criminal law involving fraud, bribery or gratuity violations potentially affecting the federal award."

## Competition 200.319

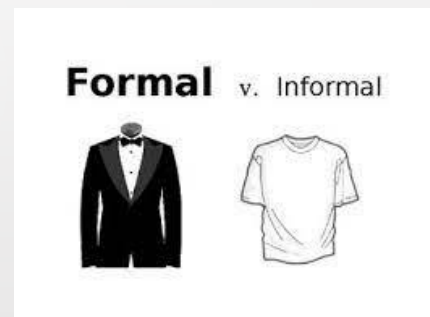
(a) All procurement transactions **for the acquisition of property or services required under a Federal award** must be conducted in a manner providing full and open competition consistent with the standards of this section and §200.320.

...

**(f) Noncompetitive procurement can only be awarded in accordance with 200.320(c).**

## Methods of Procurement 200.320

- Grantee **must have and use documented procurement procedures** for the following methods:
  - (a) **Informal procurement methods**
    - Micro-purchase
    - Small purchase procedures
  - (b) **Formal procurement methods**
    - Competitive sealed bids
    - Competitive proposals
  - (c) Noncompetitive proposals





## Informal Procurement 200.320(a)

- Use when value does not exceed \$250,000 (simplified acquisition threshold), or a lower threshold established by a non-federal entity
- Procurement of property or services required under federal award
- Purpose: to expedite completion and minimize administrative burden and cost

## Informal Procurement, 200.320(a)(1) Micro-purchases

- Distribution. "To the maximum extent practicable, the non-federal entity should distribute ... among qualified suppliers."
- Awards. May be awarded without price or rate quotes if non-federal entity "considers the price to be reasonable based on research, experience, purchase history or other information and documents its files accordingly."

## Informal Procurement, 200.320(a)(1) Micro-purchases (cont.)

- Thresholds. Determined and documented by grantee, based on internal controls, risk, and procedures. Authorized by state, local laws. May be higher than threshold in FAR (\$10,000).
  - Nonfederal entity may self-certify threshold up to \$50,000, if:
    - Low-risk auditee for most recent audit (200.520)
    - Annual internal institutional risk assessment to identify, mitigate and manage financial risks; or
    - For public institutions, a higher threshold consistent with state law
  - Over \$50,000, must have approval of cognizant agency indirect costs

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## Informal Procurement, 200.320(a)(2) Small Purchases

- Used when for purchases greater than micro-purchase threshold, but less than simplified acquisition threshold (\$250,000).
- Price or rate quotations from "adequate number of qualified sources" as determined appropriate by non-federal entity
- Thresholds. Established based on internal controls, risk and procedures, and documented. Cannot exceed the threshold in FAR (\$250,000) but may be lowered.

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## Formal Procurement, 200.320(b)

- Used for purchases that exceed small purchase threshold (\$250,000, or lower, if set by the non-federal entity)
  - Require documented procedures
  - Require public advertising
- Two options:
  1. Sealed bids
  2. Proposals

## Sealed Bids

Used when:

1. A complete, adequate, and realistic specification or purchase description is available
2. Two or more responsible bidders are willing and able to compete effectively
3. The procurement lends itself to a firm, fixed-price contract and selection is principally based on cost.

## Request for Proposal

Used when item is the item to be purchased or the services to be rendered are difficult to describe.

1. Must have a written method for conducting technical evaluations of proposals and making selections.
2. Contract is awarded to offeror whose proposal is most advantageous considering price and other factors.

## Noncompetitive Proposals 200.320(c)

Appropriate only when:

- **Micro-purchases**
- The item is only available from a single source;
- There is a public emergency for the requirement that will not permit delay resulting from **publicizing** a competitive solicitation;
- The Federal awarding agency or pass-through expressly authorizes noncompetitive procurement in response to a written request from non-Federal entity; or
- After soliciting a number of sources, competition is determined inadequate.



## Domestic Preferences for Procurements 200.322

- “To the greatest extent practicable” must provide a preference for the purchase of goods and materials produced in the U.S.
- Must include this section in all subawards, contracts and purchase orders

## Suspension and Debarment 2 CFR 180.300

For contracts over \$25,000 (“covered transaction” 3485.220) you must verify that the person with whom you intend to do business is not excluded or disqualified.

- This MUST be done by either:
  - a. Checking SAM; or
  - b. Collecting a certification from that person; or
  - c. Adding a clause or condition to the covered transaction with that person.

## Prohibition on certain telecommunications and video surveillance services or equipment 200.216

- Effective as of **November 12, 2020**
  - Prohibits grantees from entering into contracts with certain covered entities
- **200.471**: Telecommunication and video surveillance services or equipment are allowable, except:
  - “Covered” telecommunications and surveillance under 200.216
  - Applies to new contracts, services, equipment, and any renewals or extensions

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## Prohibition on certain telecommunications and video surveillance services or equipment 200.216 (cont.)

- OMB FAQ 47: How do you know if an entity has been added to the list of covered entities?
  - Entities added to this list will be incorporated into the excluded parties list in the SAM ([www.sam.gov](http://www.sam.gov)). When a user conducts a search of the excluded parties list, a record will appear describing the nature of the exclusion for any entity identified as covered by this prohibition.
- Recommendation: Check SAM.gov for applicable contracts!

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## Definitions 200.1 (cont.)

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**Equipment:** tangible, non-expendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.



**Supplies:** All tangible personal property other than equipment



**Computing Devices:** If less than \$5,000 per unit, defined as supplies

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## Inventory Procedures – 200.313(d)

- Property records
  - Description, serial number or other ID, source of funding, title, acquisition date and cost, percent of federal participation, location, use and condition, and ultimate disposition date including sale price
- Physical inventory at least every two years
- Control system to prevent loss, damage, theft
  - All incidents must be investigated
- Adequate maintenance procedures
- If authorized or required to sell property, proper sales procedures to ensure highest possible return.

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## Use of Equipment – 200.313(c)

- Equipment must be used by the Non-Federal entity in the program or project for which it was acquired if needed, whether or not the project or program continues to be supported by the Federal award.
- When used it must be shared, provided such use will not interfere with work on the original projects/programs, and it follows this order of priority:
  - First by other programs from same agency
  - Then open to other federal programs
  - Non-federal programs



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## Replacement Equipment 200.313(c)(4)

May use sale price of old equipment towards purchase price of replacement equipment

- Calculate new federal share!

## Disposition – 200.313(c)(1) & (e)

- When no longer needed, may be used in other activities with the following priority:
  - Projects supported by Federal awarding agency
  - Project funded by other Federal agencies
- When property is no longer needed in any current or previously Federally-funded supported activity, must follow disposition rules:
  - Fair market value > \$5,000 = pay federal share back to awarding agency
  - Fair market value of \$5,000 = no money owed back to feds
- Supplies (200.314): Depends on value of residual inventory of unused supplies

# Allowability

## Factors Affecting Allowability

2 CFR 200.403

- ✓ **Necessary** and **reasonable** for the performance of the federal award
- ✓ **Allocable** to the federal award
- ✓ **Consistent with policies and procedures** that apply uniformly to both federally-financed and other activities of the District
- ✓ Conforms to any limitations or exclusions set forth as cost principles in Part 200 or in the terms and conditions of the federal award
- ✓ Accorded consistent treatment as either a direct or indirect cost
- ✓ Adequately **documented**
- ✓ Determined in accordance with GAAP
- ✓ Not included as a match or cost-share, unless authorized by the federal program
- ✓ Net of applicable credits
- ✓ **Incurred during the approved budget period**

## Necessary 200.404

Cost is “generally recognized as ordinary and necessary for the operation of the non-federal entity or the proper and efficient performance of the federal award.”

- Is the cost included in your plan / grant application?
- Is it aligned with the goals of the program / grant?
- Does your agency have the capacity to use what you are purchasing?
- Is the staff knowledgeable regarding the program?

## Reasonable 200.404

“A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a reasonably prudent person under the circumstances prevailing at the time the decision was made to incur the cost”

## Reasonable 200.404

### **Consideration must be given to:**

- Sound business practices
- Arms length bargaining (hint: procurement processes)
- Federal, state and local laws
- Terms of the grant award
- Market Prices for comparable goods or services in the geographical area
- Whether the individuals acted with prudence under the circumstances
- No significant deviation from established prices.

## Allocable 200.405

A cost is allocable to a Federal award or cost objective if the goods or services involved are chargeable or assignable in accordance with relative benefits received.

- Incurred specifically for the award;
- Benefits both award and other work and can be distributed in proportions that may be approximated using reasonable methods; and
- Necessary to the overall operation of the entity and assignable to the award in accordance with this Part.

## Allocable (cont.)

- Do you have enough time to implement the cost? (UGG Section 200.405)
- Is the program that bought the product using it?
- Is the program sharing the use of the item(s)?
  - Was this shared use known at the time of purchase?
  - If so, how are costs being shared?
- How is the use being documented?



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## Applicable Credits 200.406

- Those receipts or reduction-of-expenditure type transaction that offset or reduce expense items – must be credited to the Federal award as either cost reduction or cash refund, as appropriate.
- Examples: purchase discounts, rebates or allowances, recoveries or indemnities on losses, insurance refunds or rebates, adjustments of overpayments

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## Direct v. Indirect Costs

Direct and Indirect costs: 2 CFR 200.413; 200.414

- Most costs are directly charged to the grant.
  - Salaries of administrative and clerical staff should be treated as “indirect”
- For costs that can not be directly charged, grantees have an indirect cost rate.

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## Period of Performance, Budget Period, Renewal (200.1)

New definitions!

- May have more than one budget period within period of performance; renewal starts a new period of performance (200.1).
- Period of Performance- The total estimated time interval between the start of an initial Federal award and the planned end date.
  - Does not commit the awarding agency to fund beyond the approved budget period.
- Modifications to Period of Performance (200.309)
  - Extension = Period of Performance will be extended.
  - Termination = Period of Performance will be amended to end upon termination date.
  - Renewal = A distinct Period of Performance will begin.

## Financial Obligations 200.1

- Financial obligation = Means orders placed for property and services, contracts and subawards made and similar transactions during a given period that require payment during the same or a future period.
- Reimbursement Payment Process
  - Obligation
  - Liquidation
  - Payment
  - Drawdown





## When Obligations Are Made

### 34 CFR 76.707

Type of Obligation	When Obligation Occurs
Acquisition of Property	Date of binding written commitment
Personal Services by Employee	When services are performed
Personal Services by Contractor	Date of binding written commitment
Travel	When travel is taken
Approved Pre-Agreement Cost	On the first day of the grant or subgrant performance period.

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## Pre-Award Costs 2 CFR 200.458

- Those costs incurred prior to the effective date of the Federal award directly in negotiation or anticipation of the award
- Costs must be necessary for efficient and timely performance of the scope of work
- Allowable to the extent they would have been allowable if incurred after the effective date and ONLY with written approval from the Federal awarding agency.

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## Closeout 2 CFR 200.344 (formerly 200.343)

- Subrecipients must prepare closeout reports and final accounting within 90 days after period; pass-through entities have **120 days**
- Unless federal or pass-through gives extension, all financial obligations must be liquidated no later than **120 days** after period ends
  - Effectively limit subrecipient liquidation to 90 days??
- 2 CFR 200.343



## Selected Items of Cost

### 56 Selected Items of Cost

- Allowable
  - E.g., collection of improper payments (200.428); training and education costs (**200.473**)
- Allowable with special conditions
  - E.g., only as an indirect charge (leave payout, 200.431; advisory councils, 200.422); only with necessary documentation (compensation – personal services, 200.430)
- Allowable with prior approval
  - E.g., equipment and capital expenditures (200.438); entertainment (200.439); participant support costs (200.456)
- Unallowable
  - E.g., alcohol (200.423); bad debts (200.426)

## Selected Items of Cost Examples

### **Alcohol 200.423**

- Not allowable

### **Entertainment 200.438**

- Not allowable UNLESS Prior Written Approval of Federal Awarding Agency.
- Field Trips & Holiday Parties are common examples
- Field trips may be allowed where:
  - They have a clear programmatic purpose
  - And are authorized by the federal awarding agency



## Advertising/Public Relations 200.421

### **Allowable for programmatic purposes including:**

- Recruitment
- Procurement of goods
- Disposal of materials
- Program outreach
- Public relations (in limited circumstances)

## Conferences 200.432

### Generally Allowable

- To be a conference, must disseminate technical information beyond the non-federal entity
- Allowable conference costs include rental of facilities, costs of meals and refreshments, transportation, unless restricted by the federal award
- Costs related to identifying, but not providing, locally available dependent-care resources
- Conference hosts must exercise discretion in ensuring costs are appropriate, necessary and managed in a manner that minimizes costs to federal award

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## Participant Support Costs 200.456



- Direct costs in connection with conferences or training projects paid on behalf of participants or trainees (but not employees)
- Allowable, but only with prior approval.

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## Travel 200.475 (new citation)

- Travel costs may be charged on actual, per diem, or mileage basis
- Travel charges must be consistent with entity's **written** travel reimbursement policies
- Allows costs for “above and beyond regular dependent care”
- Grantee must retain documentation that participation of individual is necessary for the project

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## Telecommunication costs and video surveillance costs 200.471

- Telecommunication and video surveillance services or equipment are allowable, except:
  - “Covered” telecommunications and surveillance under 200.216
  - Applies to new contracts, services, equipment, and any renewals or extensions

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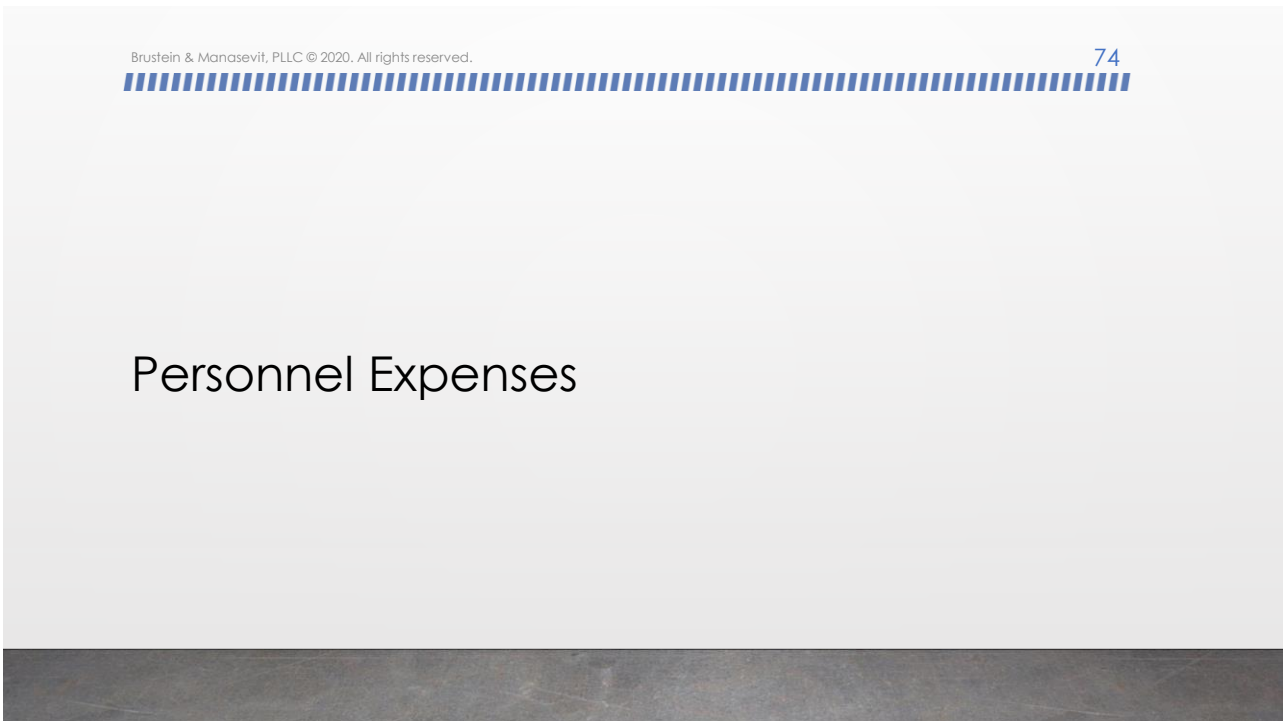


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## Documentation

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## Personnel Expenses

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## Time & Effort - Common Findings



**Organization  
pays salaries  
based on  
budget**



**Organization  
does not have a  
control system,  
for time & effort**



**Effort  
certifications  
are not  
accurate**



**Failure to  
reconcile actual  
effort to funding  
source**

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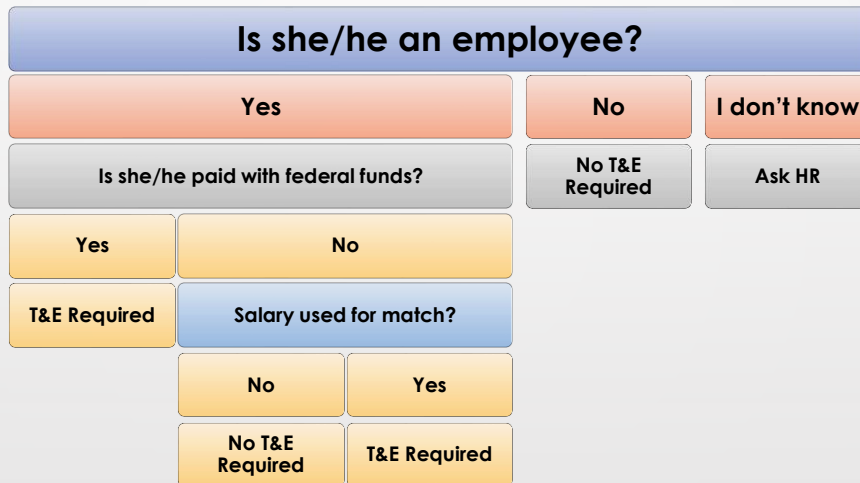
## Who? 200.430(i)(1) & (4)

- Time and effort must be collected for all employees (not contractors) whose salaries are:
  - Paid in whole or in part with federal funds ; and
  - Used to meet a match/cost share requirement.
- Includes:
  - Full time and part time employees;
  - Federal stipends that are considered salary expenses;



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## Does “X” Employee have to keep time and effort records?



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## Why? 200.403(a); 200.430(i)

- Any employee funded by federal grants must maintain documentation showing that their time is allocable to a federal program.
- That documentation must be based on records that **accurately reflect the work performed.**
  - Everything else feeds back into this standard

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# Standards for Documentation of Personnel Expenses 200.430(i)(1)

Time and effort records MUST:

1. Be supported by a system of internal controls which provides reasonable assurance charges are accurate, allowable and allocable;
2. Be incorporated into official records;
3. Reasonably reflect total activity for which employee is compensated;
4. Encompass all activities (federal and non-federal);
5. Comply with established accounting policies and practices; and
6. Support distribution among specific activities or cost objectives.

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## 1. Supported by a System of Internal Controls

- What are the best controls?
  - Anything that will go towards the veracity and accuracy of documentation supporting salaries
  - Verifiable documentation
    - Signatures (not required but a good control)
      - Electronic signatures are allowable!
    - Documentation from person with first-hand knowledge
  - T&E Policies & Procedures 200.430(a)

Signature Style



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## 2. Incorporated Into Official Records

- No federal standard
- However, YOUR non-federal entity maintains documentation, time distribution records **MUST** conform
- For subrecipients, may have specific requirements from pass-through



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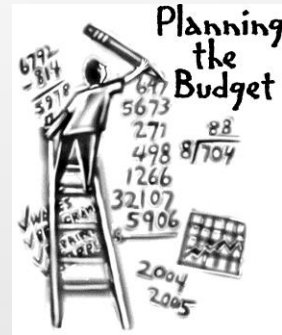
## 3. Reasonably Reflect Total Activity

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## Budget Estimates 200.430(i)(1)(viii)

- Budget estimates alone do not qualify as support for charges to Federal awards but may be used for interim accounting purposes if:
  - Produces reasonable approximations
  - Significant changes to the corresponding work activity are identified in a timely manner
  - Internal controls in place to review after-the-fact interim charges based on budget estimates



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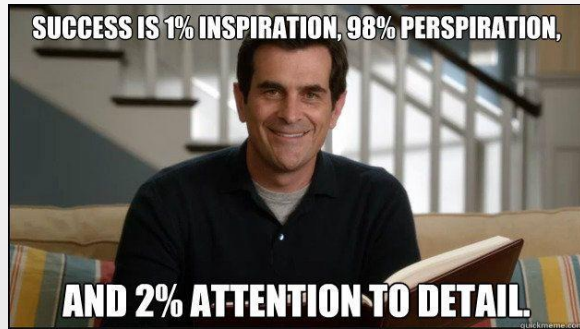
## Reconciliation 200.430(i)(1)(viii)(C)

- All necessary adjustments must be made such that the final amount charged to the Federal award is accurate, allowable, and properly allocated.
- Cannot overcharge the federal program!

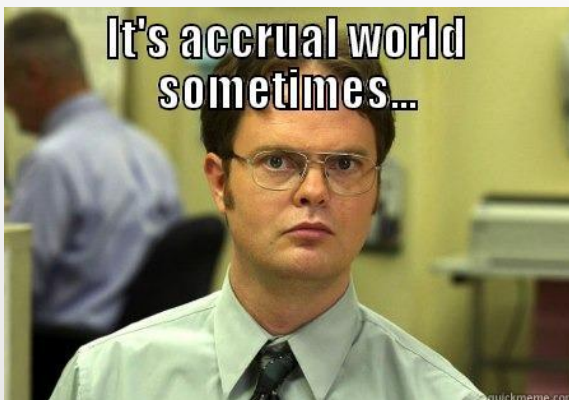
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#### 4. Encompass ALL Activities

All 100% of effort must be recorded, regardless of federal vs. non-federal time.



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#### 5. Comply With Established Accounting Policies and Practices

- Salary expenses, tracking and reconciliation should all follow the entity's standard accounting practices.
- Anomalies are red flags to auditors.

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## 6. Track Time By Cost Objective

### Cost Objective 200.1

- Program, function, activity, award, organizational subdivision, contract, or work unit for which cost data are desired ...
- Examples: set-asides, mandatory spending caps, etc.

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## How do we allocate costs? 200.405

- Any cost allocable to a particular Federal award **may not** be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the Federal awards, or for other reasons.



=Cost Shifting!

- But, still can shift costs that are allowable under two or more Federal awards in accordance with existing Federal statutes, regulations, or the terms and conditions of the Federal award.

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What do we do when a cost benefits two or more projects?

*If you can determine this without undue effort or cost*

Cost should be allocated to the projects based on proportional benefit.



If proportions cannot be determined, then costs may be allocated or transferred to benefitted projects on any reasonable documented basis.

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## Compliance 200.430(i) (2)

- For records which meet the standards, the non-federal entity will not be required to provide additional support or documentation for the work performed.
  - DOL regulations for Fair Labor Standards Act must still be met (i.e. charges must be supported by records indicating the total number of hours worked each day).

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## Noncompliance

### Findings!!

- Repayment of Unallowable Costs!
- ED may require personnel activity reports (PARs), including prescribed certifications or equivalent documentation that support the records as required in this section (200.430(i)(8)).



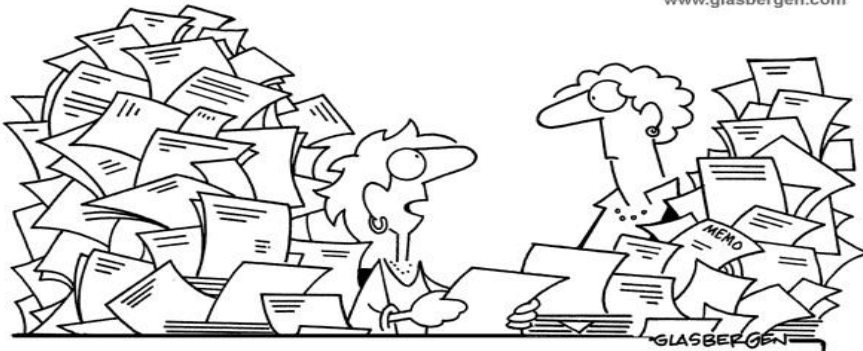
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## Other Documentation



## Know Where your Documents Are!

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**"I am not disorganized — I know exactly where everything is!  
The newer stuff is on top and the older stuff is on the bottom."**

## Allowability Documentation

Retention Requirements For Records – **2 CFR 200.334** (new citation!)

- Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a **period of three years** from the date of submission of the final expenditure report.
- Watch Statute of Limitations! (Example, False Claims Act = 6 years)



## Written Procedures: Must or Should?

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>▪ Cash Management Procedures - 200.302(b)(6) &amp; 200.305</li> <li>▪ <b>Allowability Procedures - 200.302(b)(7)</b></li> <li>▪ Managing Equipment – 200.313(d)</li> <li>▪ Conflicts of Interest Policy - 200.318(c)</li> <li>▪ <b>Procurement Procedures - 200.320</b> <ul style="list-style-type: none"> <li>▪ Method for Conducting Tech Evals of Proposals</li> <li>▪ Establishment of thresholds</li> </ul> </li> <li>▪ Travel Policy - 200.475(b) (new citation)</li> </ul> | <ul style="list-style-type: none"> <li>▪ Time and Effort Procedures - "essential" ED, Cost Allocation Guide (agency specific)</li> <li>▪ Subrecipient Monitoring Procedures – required by Compliance Supplement</li> <li>▪ Grant Application Procedures</li> <li>▪ Record Retention Procedures</li> <li>▪ Audit Resolution Procedures</li> <li>▪ Program-specific Procedures</li> </ul> |
|--|---|

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## Updates needed due to pandemic?

- Compensation / benefits procedures
- Time and effort procedures
- Travel reimbursements
- Allowability procedures
- Inventory management procedures



Stephanie Pransky-Scholz

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## How to Maintain Documentation?

- When original records are electronic and cannot be altered, there is no need to create and retain paper copies. (UGG Section **200.336 (new citation)**)
- When original records are paper, electronic versions may be substituted through the use of duplication or other forms of electronic media provided they:
  - Are subject to periodic quality control reviews;
  - Provide reasonable safeguards against alteration; and
  - Remain readable.

## Questions?



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