





Federal Reporting Requirements for HRSA Award Recipients

Healthy Grants Workshop May 14, 2025

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Office of Federal Assistance and Acquisition Management (OFAAM)

Vision: Healthy Communities, Healthy People



Today's Topics

- Federal Funding and Transparency Act
- □ Federal Financial Report
- Noncompeting ContinuationProgress Reports
- □ Property Reports
- Closeout
- □ FAQs
- □ Resources & Training







Reporting Requirements

 As a HRSA award recipient, you must report on your use of HRSA funds. These requirements are a condition of your HRSA award.

www.hrsa.gov/manageyour-grant/ training/workshops





Federal Funding and Transparency Act (FFATA)

FFATA Subaward Reporting moved to SAM.gov

What's changed?

- The FFATA Subaward Reporting System (FSRS.gov) was decommissioned on 03/06/2025.
- Starting 03/08/2025 FFATA subaward reporting capabilities are now available in the System for Award Management (SAM.gov).

What's the same?

 FFATA reporting requirements: Federal prime awardees (contractors and grantees) will report subaward and executive compensation data regarding first-tier subawards.

**This transition will have minimal impact for grant recipients who do not participate in subaward reporting, searching, or role management.





FFATA Subaward Reporting moved to SAM.gov

- Notifications sent to active FSRS.gov accounts (user logged in within 2 years).
- SAM.gov held training webinars.
- Banner posted in EHBs to remind grantees of the change.
- HRSA revised the Notice of Award (NoA) FFATA term to direct recipients to SAM.gov for reporting.

- More information can be found at: www.SAM.gov/FSRS
- Recipient's system-related inquiries should be directed to the Federal Service Desk (www.FSD.gov)
- Direct your FFATA-related inquiries to <u>HRSAPostAwards@hrsa.gov</u>





Knowledge Check #1

Where do recipients report FFATA information?

- A. Electronic Handbook (EHB)
- B. Grants.gov
- C. SAM.gov
- D. HRSA Grants Management Office







Knowledge Check #1 - Answer

Where do recipients report FFATA information?

Answer: C – SAM.gov





Federal Financial Report (FFR)

Grantees must submit Annual and Final FFRs to HRSA in PMS:

- Complete the FFR in the Payment Management System (PMS).
- Annual FFRs are currently aligned with the PMS quarterly reporting due dates.
- Final FFRs are due to HRSA 120 days after the grant end date.
- EHBs sends email reminders before and after FFR due dates.







Federal Financial Report Overview

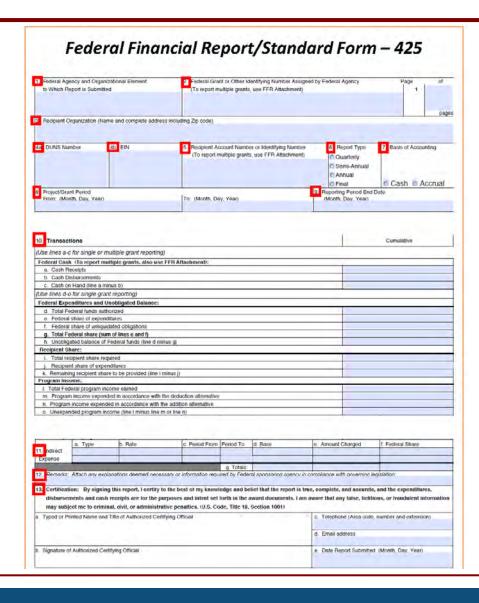
FFR Walkthrough – Submission Schedule

BUDGET YEAR END DATE	ANNUAL REPORT DUE Jan. 30, Apr. 30, July 30, or Oct. 30
August 31	January 30
September 30	January 30
October 31	January 30
November 30	April 30
December 31	April 30
January 31	April 30
February 28/29	July 30
March 31	July 30
April 30	July 30
May 31	October 30
June 30	October 30
July 31	October 30





Annual FFR/SF-425



Example of the FFR Form





Knowledge Check #2

True or False

The budget period ended April 30th and the FFR due date is July 30th; do I report all funds expended to the date of July 30th?







Knowledge Check #2 - Answer

The budget period ended April 30th and the FFR due date is July 30th; do I report all funds expended to the date of July 30th?

Answer: False - Expenditures should include all costs incurred through the reporting period end date specified on the FFR.





Non-Competing Continuation (NCC) Progress Reports

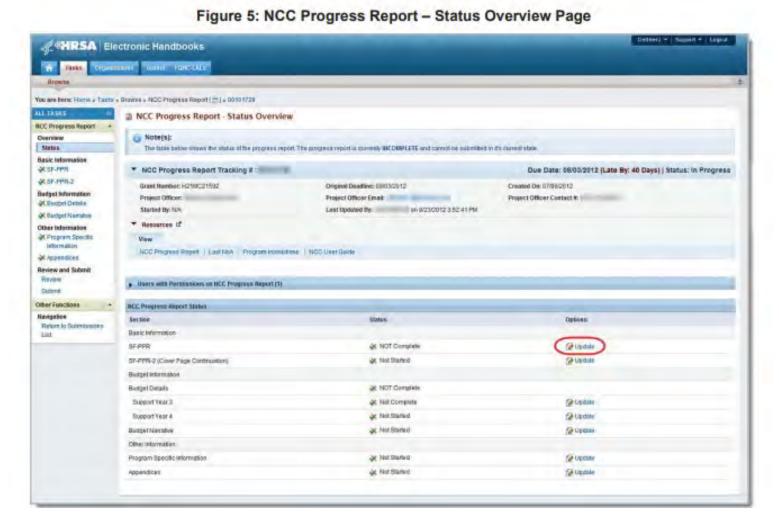
- Annual progress report detailing progress made since submission of the last application.
- Submit in EHBs.
- Instructions and <u>EHBs User Guide</u>
 available on HRSA's webpage:
 <u>www.hrsa.gov/grants/manage-your-grant/reporting-requirements</u>
- Reminder: SAM registration at <u>www.sam.gov</u> must be active.







NCC Report Submission Components



Screenshot of a generic NCC Report Submission





Property Reports

Tangible Personal Property

Property of any kind, except real property, that has physical existence. It includes equipment and supplies. Copyrights, patents or securities are not included.

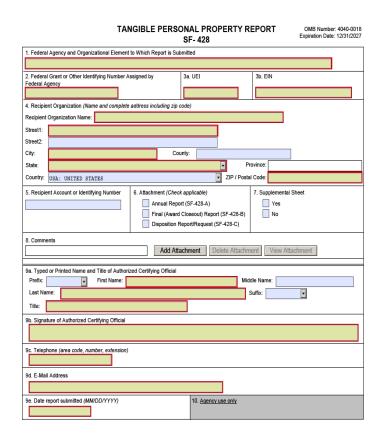
DEFINITIONS

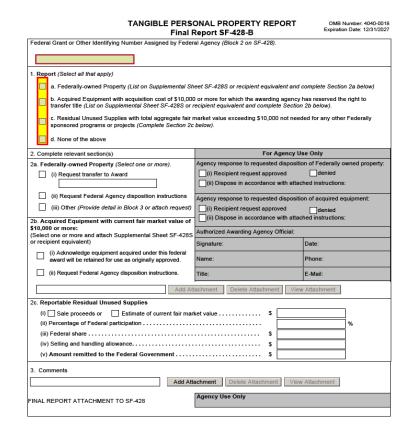
- Equipment (2 CFR 200.313): Tangible personal property (including IT systems) with a useful life >1 year and a per unit cost that equals or exceeds \$10,000.
- Supplies (2 CFR 200.314): All tangible personal property other than those described in the equipment definition with a per unit cost less than \$10,000.

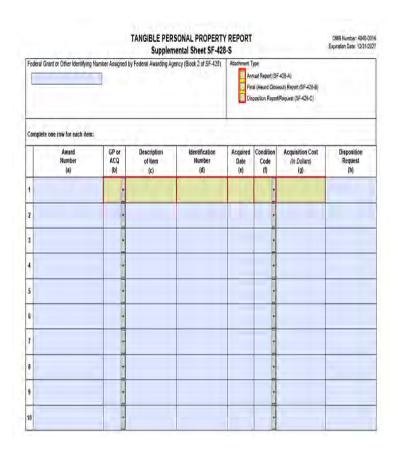




Tangible Personal Property Report: SF-428 Form









SF-428 forms provide final tangible personal property information for grant closeout.



Knowledge Check #3

True or False

My award was issued on June 1, 2020 and is just now closing out in June 2025. Can I use the SF-428 Forms with an expiration date of 6/30/2020 when I submit my Tangible Personal Property Report?







Knowledge Check #3 – Answer

My award was issued on June 1, 2020 and is just now closing out in June 2025. Can I use the SF-428 Forms with an expiration date of 6/30/2020 when I submit my Tangible Personal Property Report?

Answer: No – You must use the most up-to-date SF-428 Forms with an expiration date of 12/31/2027.





Closeout

Effective October 1, 2023 - Change in Federal Award Closeout Provisions 2 CFR 200.344

- Recipients must submit all (financial, performance and other reports) and liquidate all financial obligations no later than 120 calendar days after the end of the period of performance.
- HRSA must complete closeout actions no later than one year after the end of the period of performance.
- If recipients don't comply with submitting final reports timely HRSA must report the recipient's material failure to comply with the terms and conditions of the Federal award in SAM.gov.
- Visit Federal Register Notice





FAQs

Q1: Our award was issued before 10/01/2024. Should we report on equipment using the \$5K threshold?

A: No. Follow <u>2 CFR 200.313</u> which increases the definition of equipment from \$5K to \$10K that "may be retained, sold, or otherwise disposed of with no further responsibility to the Federal agency"(2 CFR section 200.313(e)(1)).

Q2: Our award expired before 10/01/2024. Should we follow the \$5K threshold for equipment?

A: Yes. Use the previous \$5K threshold listed in 45 CFR Part 75. Awards active as of 10/01/24, will follow the new provisions at 2CFR § 200.314(a) and the increased supply threshold of \$10K.





Resources and Technical Assistance Information

- HRSA EHBs Help Desk:
 - **•** (877) 464-4772
 - 8:00 am 8:00 pm EST
- EHBs Help & Ticketing System:
 http://www.hrsa.gov/about/contact/eh
 bhelp.aspx
- Grants Management Specialist or Program Officer listed on your Notice of Award (NoA)
 - Boxes 9 and 10













Time and Effort Reporting and Documentation

Healthy Grants Workshop

May 14, 2025

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Office of Federal Assistance and Acquisition Management (OFAAM)

Vision: Healthy Communities, Healthy People



Learning Objectives

- Recognize the federal requirements for time and effort
- Identify common issues with time and effort reporting
- Describe how time and effort should be charged
- Recognize types of time and effort documentation
- Discuss how your organization's internal control including policies and procedures for time and effort is part of the reporting process





Polling Question

Are you familiar with the requirements for time and effort reporting?







What is Time and Effort Reporting?

- Effort is defined as the amount of time spent on a particular activity
 - Includes time spent working on a sponsored project in which salary is:
 - ✓ Directly charged, or
 - ✓ Cost-shared (also known as match)
- Individual effort can be expressed as a percentage of the total amount of time spent on work-related activities
 - Examples include:
 - ✓ Project management
 - ✓ Research
 - ✓ Administration
 - ✓ Instruction
 - Effort reporting is the required method of certifying that the effort charged or cost shared to each award has been completed

Why is Time and Effort Reporting Needed?

Time and effort reporting is required to document that:

Federal funds were charged only for time actually worked

Personnel costs are for allowable activities

 Federal programs paid only their proportionate share of personnel costs





Who Must Keep Time and Effort Records?

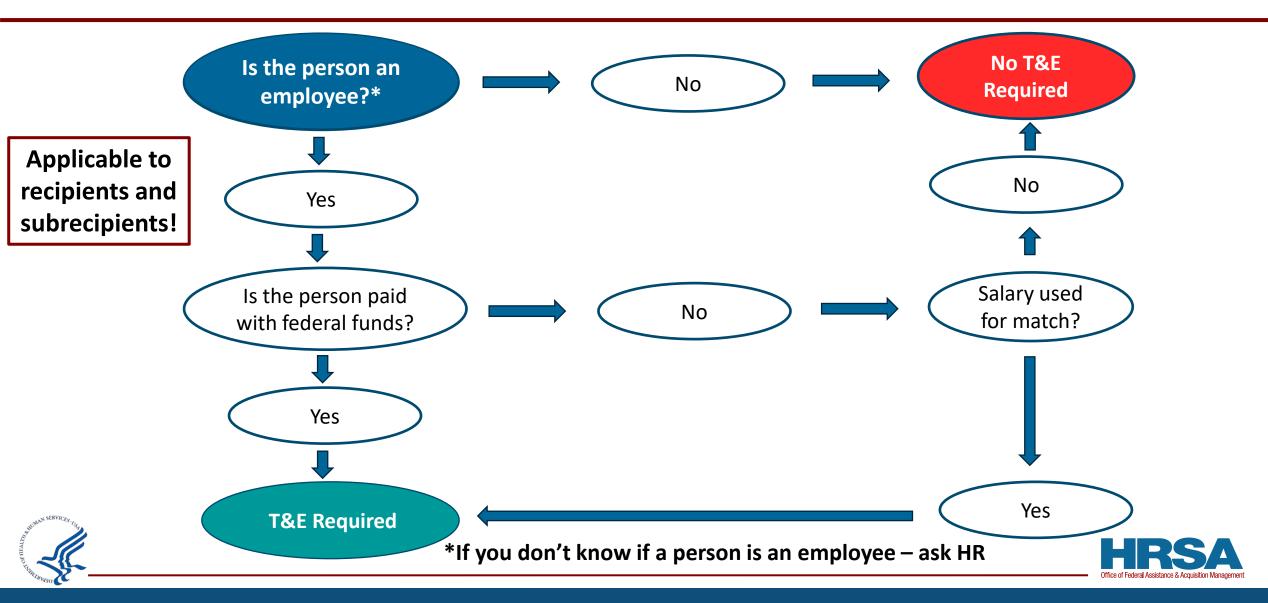
Time and effort records must be maintained for all employees*:

- 1. Who are paid in whole or in part with federal funds and/or
- 2. Whose salaries are used to meet a match/cost share requirement

*not required to be maintained for contractors since they are not considered employees; but note that subrecipients **are required** to maintain time and effort records.



Who Must Keep Time and Effort Records (cont.)



Knowledge Check #1

True or False?

Do Time and Effort Reporting and personnel activity reports need to be maintained by everyone including contractors who are paid with the grant funds?







Knowledge Check #1 - Answer

Do Time and Effort Reporting and personnel activity reports need to be maintained by everyone including contractors who are paid with the grant funds?

Answer: False - Contractors are not considered employees, and therefore are not required to maintain time and effort records.





Common Issues with Reporting Time and Effort







Common Issues with Reporting Time and Effort

Identified in Single Audits and HRSA Site Visits:

- Using grant funds to pay employees based on budgeted hours
 - MUST be based on actual hours
- No allocation for employees whose salary is charged to multiple sources
- Using percentage of grant funding to determine an employee's percentage of time worked
 - MUST be in proportion to the time spent to achieve the purpose of the grant





Common Issues with Reporting Time and Effort (cont.)

 Inconsistent application of requirements across all sources of funding

 Charging time to federal awards when no work on the federal award occurred to make up for funding shortfalls

- Total time charged across sources exceeds 100%
 - Cannot exceed 100%





Time and Effort Expense Charges







Time and Effort Expense Charges

The actual percentage of employees' time must be documented by funding source and recorded (to the general ledger)

- Final amounts cannot be based on estimates or budgets
- Total must not exceed 100%
- Documentation must be maintained to support allocations





Use of Percentages

Can time and effort records use percentage of time? Yes!

Because practices vary as to the activity constituting a full workload, records may reflect categories of activities expressed as a percentage distribution of total activities.

Must be supported by documentation!





Use of Percentages Example 1

Example 1: Lisa is budgeted to spend 50% of her time on a health services grant and 50% of her time on a research grant. For a given week, if she spends four days doing project management for the health services grant and one day on research, then she should record 80% of her time on the health services grant and 20% of her time on the research grant. No matter what the budget is, she should always record the actual percentage of time worked on both programs.





Use of Percentages Example 2

Example 2: John is budgeted to spend 100% of his time on a Healthy Start grant. For a given week, if John spends 30 hours on the Healthy Start grant and 10 hours of his time doing work on a federal contract, then he should record 75% of his time to the Healthy Start grant and 25% of his time to the contractual work. He should not record 100% to the Healthy Start grant and 25% to contractual activities. Remember, total effort cannot exceed 100%. Similarly, he should not simply record 100% to the Healthy Start grant as effort should be based on actual hours.





Use of Budget Estimates

Budget estimates alone do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, if:

Approximations are reasonable



- Significant changes in the corresponding work activity are identified and entered into the records in a timely manner
- Supported by a system of internal controls to review after-the-fact interim charges
- Adjustments made to the final amount charged to the award must be accurate, allowable, and properly allocated

Reconciliations required!





Knowledge Check #2

True or False?

Do budget estimates qualify as support for charges to federal awards?







Knowledge Check #2 - Answer

Do budget estimates qualify as support for charges to federal awards?

Answer: False - Budget estimates are not sufficient for time and effort reporting. Reconciliations must reflect the actual time worked on time and effort reports.





Time and Effort Documentation







Documentation of Personnel Expenses

All salaries and wages must be based on records that accurately reflect the work performed (45 CFR 75.430(i)(1))

- Be supported by a system of internal controls which provides reasonable assurance that charges are accurate, allowable and allocable
- Be incorporated into official records
- Reasonably reflect total activity for which employee is compensated
- Encompass all compensated activities (federal and non-federal)
- Comply with established accounting policies and practices and
- Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award

Compliance vs. Noncompliance

- If records meet the standards → Compliance (45 CFR 75.430(i)(2))
 - No additional support or documentation for the work performed will be required.
- If records DO NOT meet the standards → Noncompliance (45 CFR 75.430(i)(8))
 - HRSA may require personnel activity reports including prescribed certifications, or equivalent documentation.
 - May result in an audit finding.

ALWAYS maintain detailed records!





Time and Effort Internal Control Examples

- Written policies and procedures
- Review and supervisory approval of records
- Periodic internal 'review' or time studies
- Certification
 - Attesting that salaries, wages, and benefits charged to the grant are reasonable and accurate in relation to the work performed
- After-the-fact reconciliation and adjustments
- Review of the process as personnel and positions change
 - Review of job descriptions
- Quarterly budget to actual reviews
 - Update budget if actual time and effort consistently differs from estimate



Time and Effort Policies and Procedures

 Recipients must have written policies surrounding time and effort reporting

Must be consistent (applied to both federal and non-

federal activities)

Time and effort policies

Time and effort reporting







Time and Effort Certification

Certification

"I ______ herby certify that I spent X% of my time working on during the time period ."

- Recommend completing at a minimum semi-annually
- Include process in your documented policies and procedures
- Complete for all employees including 100% funded by one federal source
- Signed by employee AND supervisor





Knowledge Check #3

True or False?

Time and effort reporting does not apply to exempt employees who do not fill out timesheets.







Knowledge Check #3 – Answer

True or False?

Time and effort reporting does not apply to exempt employees who do not fill out timesheets.

Answer: False





Time and Effort Certification – Example

- Example data:
 - Michael Jones is an employee who worked 50% of his time on the Healthy Start program, 20% on the homeless grant, 20% school based grant, and 10% on the postpartum women grant during the period February 10, 2020 through February 21, 2020.





Time and Effort Certification – Example (cont.)

Example

ABC HealthCare, Inc.

1200 Pennsylvania Ave Washington, DC 20500



Time and Effort Certification

1 Michael Jones certify that I spent

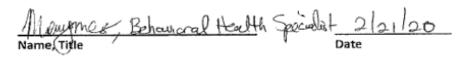
50 % of my time working on the Halthy Start Grant

20 % of my time working on the Homeless Grant

20 % of my time working on the School-Based Growt

10% of my time working on the Postportum Women Growt

during the time period of 2|10-2|21|20.

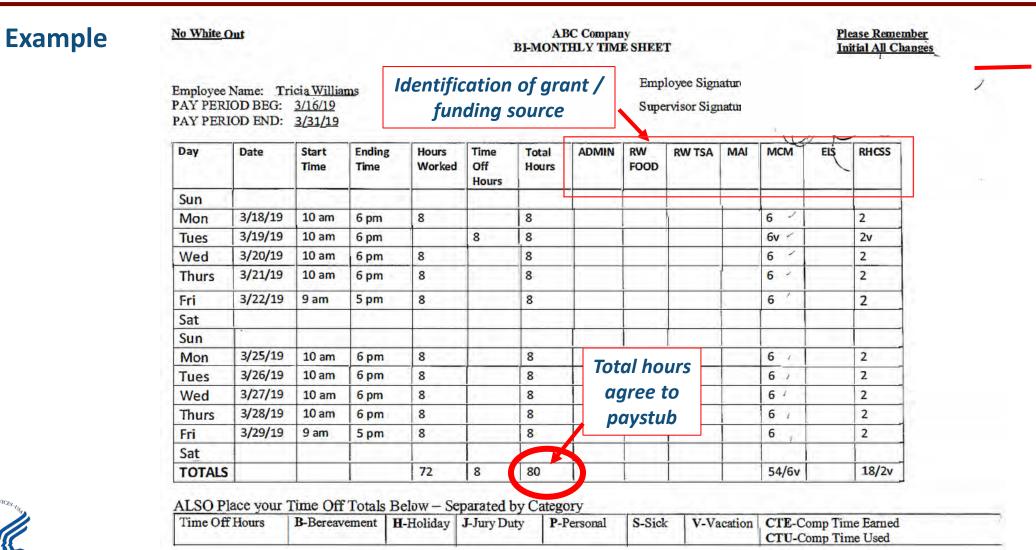


Maurean World, Program Director 2/21/20
Supervisor, Title Date





Personnel Activity Reports



Signature of

employee and

supervisor

Personnel Activity Report – Pay Stub

Check number: 7657

Example

Tricia Williams 801 Market Street Philadelphia, PA 19107

Employee Pay Stub

Total hours agree to time and effort reporting form (Bi-Monthly time sheet)

Tricia Williams, 801 Ma	rket Stree	t Philade	elphia, PA 19	107		
Earnings and Hours	Qty	Rate	Current Y	TD Amoun		
Hourly Vacation Hourly	72.00 8.00	20.00	1,440.00 160.00	18,080.00 360.00		
	80.00		1,600.00	18,440.00		
Taxes			Current YTD Amount			
Medicare Employee Addi Tax Federal Withholding Social Security Employee Medicare Employee PA - Withholding			0.00 -159.00 -109.12 -25,52 -81.00	0.00 -1,506.00 -1,143.28 -267.38 -819.00		
			-374.64	-3,735.66		
Adjustments to Net Pay			Current YTD Amount			
Dental Insurance (taxable	e)	-	-15,67	-188.04 -1 600.00		
No.			-15.67	-1,788.04		
Net Pay			1,369.69	12,916.30		

***-**-1111	Single/Withhold		Fed-3/5PA	A-1/0
Pald Time	Off	Earned	YTD Used	Available
Vacation		4.00	18,00	30.00

Pay Period: 03/16/2019 - 03/31/2019

Status (Fed/State)

SSN

Pay Date: 03/31/2019

Allowances/Extra





Time and Effort Reconciliation

After-the-fact Activity Report Reconciliation Example



						Actual	ı	Budget	
	Beginning Payroll DATE	EMPLOYEE	STATE SHR	GRANT CODE	%	TIMESHEET	%	PAYROLL	VARIANCE
Г	9/25/2019	ANDREW	\$2,982.01	0302	15	447.3			\$447.30
	9/25/2019	ANDREW		0454	85	2.534.71	100	2.982.01	(\$447.30)
	9/25/2019	ANNE	\$2,346.28	0506	21.05	493.89	25	586.57	(\$92.68)
	9/25/2019	ANNE		0560	78.95	1,852.39	75	1,759.71	\$92.68
	9/25/2019	JANET	\$3,930.40	0560	100	3,930.40	100	3,930.40	-
	9/25/2019	JEAN	\$1,537.88	0560	100	1,537.88	100	1,537.88	-
	9/25/2019	JULIE	\$657.60	0560	100	657.6	100	657.6	-
	9/25/2019	LANCE	\$2,620.89	0560	100	2,620.89	100	2,620.89	-
	9/25/2019	MISTY	\$2,083.09	0454	100	2,083.09	100	2,083.09	-
	9/25/2019	PATRICIA	\$2,597.12	0559	37.5	973.92	50	1,298.56	(\$324.64)
	9/25/2019	PATRICIA		0560	62.5	1,623.20	50	1,298.56	\$324.64

- Initial payroll costs in accounting system = charged according to budget
- Adjusted to actual on a periodic basis
 - Monthly
- Final charges at the end of the grant period = actual time spent on the grant





Knowledge Check #4

Can PTO be charged to the grant?

A. Yes

B. No







Knowledge Check #4 – Answer

Can PTO be charged to the grant?

A. Yes

B. No







Key Reminders for Time and Effort



- Charges for personnel must be based on ACTUAL TIME
- Must be incorporated into OFFICIAL RECORD
- Be DOCUMENTED
- Be supported by INTERNAL CONTROLS
- Represent TOTAL COMPENSATED ACTIVITY
- Be CONSISTENT for all funding sources





Resources

- 45 Code of Federal Regulations Part 75
 - https://www.ecfr.gov/cgi-bin/text-idx?node=pt45.1.75

- HRSA Manage Your Grant
 - https://www.hrsa.gov/grants/manage/index.html
- Internal Controls Tip Sheet
 - https://www.hrsa.gov/sites/default/files/hrsa/grants/manage/internal-controls-tip-sheet.pdf
- Financial Management Requirements
 - https://www.hrsa.gov/sites/default/files/hrsa/grants/manage/financial-management-requirements.pdf





Questions?







HRSA







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