



Eric J. Holcomb, Governor Devon McDonald, Executive Director

то:	All ICJI Staff and Subgrantees
FROM:	Devon McDonald, Executive Director
RE:	Pro-Rating Timesheets and Other Expenses Grant Management Directive 6

## **EFFECTIVE DATE:** July 7, 2020

**Issue:** Often, the first fiscal report submitted for a grant will include a pay period for subgrantee employees that contains days worked prior to the beginning of the grant period of performance. Similarly, the last fiscal report will often include a pay period that contains days worked after the grant period of performance has ended.

How can a subgrantee ensure that they are submitting the correct documentation with their fiscal report that only covers eligible workdays within the award period?

Answer: 2 C.F.R. 200.309 states that a non-Federal entity may charge to the Federal award only allowable costs incurred <u>during the period of performance</u>. In addition, 2 C.F.R. 200.430 notes that compensation for personal services includes all remuneration, paid currently or accrued, for services of employees <u>rendered during the period of performance under the Federal award</u>, including but not necessarily limited to wages and salaries.

Because work performed on days prior to or following the award period was not rendered during the period of performance, this work is not an allowable cost and cannot be charged to the Federal award. Subgrantees must only seek reimbursement for the portion of the pay period that falls within the award period.

**Example:** Subgrantee A is awarded a federal grant with an award period of January 1, 2020, through December 31, 2020. The first paycheck submitted for Fiscal Report 1 includes the time period from December 30, 2019 – January 10, 2020. Subgrantee A cannot be reimbursed for work performed on December 30 or December 31 of 2019, because the award period did not begin until January 1, 2020. Subgrantee A must only seek reimbursement for those dates including and after January 1, 2020.

\*While this issue most commonly occurs with employee salaries, <u>all</u> expenses that cover a portion of time outside of the grant period of performance <u>must</u> be pro-rated. This includes salaries, employee benefits, utilities, supplies, and any other costs that cannot be specifically attributed to only days within the grant period of performance.