



BUFFALO BOARD OF EDUCATION

815 City Hall

Buffalo, New York 14202

December 13, 2019

Corrective Action Plan for Single Audit Report

On December 13, 2019, Freed Maxick issued the Board of Education Single Audit Report on federal grants. Their report included a finding relating to time and effort certifications.

Finding: 2019-001 Allowable Costs- Time and Effort

Auditor Observation:

The Board's control process to ensure that payroll expenditures are properly allocated to each applicable grant program includes the preparation, maintenance and review of time and effort certifications. During the audit it was noted instances where certifications were not completed and reviewed timely, or, in some cases, were not completed at all.

Auditor Recommendation:

We recommend that the Board review and establish written control procedures related to their standards of documentation of personnel expenditures to ensure that the Board is in compliance with requirements of the Uniform Guidance. In particular, we recommend the Board establish monitoring procedures over their time and effort certifications to confirm they are being completed and maintained in a timely manner, and to verify all time and effort is being appropriately charged to the related federal programs.

Management Response:

- 1) There are three main areas that the District plans to include in its corrective action plan, each of which will begin immediately, but have different anticipated implementation dates:
 - a) Initially, the District will revise and formalize written procedures related to the documentation of personnel expenditures, specifically related to time and effort certification collection, to be in compliance with the Uniform Guidance. A communication will be drafted to remind District staff involved in the process of the importance of their timely compliance, while a more robust monitoring system will be implemented.
 - b) The District will also examine best practices relative to the duties, responsibilities, and reporting structure for grant managers, who are integral to the process of ensuring personnel and non-personnel expenditures are appropriately charged to their related federal programs. Necessary organizational changes will be implemented after this analysis.

c) Additionally, to improve the efficiency and accuracy of the time and effort collection process, the District will research electronic systems that comply with the Uniform Guidance time and effort collection requirements. This may include incorporating time and effort certifications into an automated time keeping system.

2) Responsible persons:

- a. Revise and formalize procedures for time and effort certifications - Keith Robertson, Assistant Superintendent of Budget and Grant Management
- b. Grants department reorganization - Keith Robertson, Assistant Superintendent of Budget and Grant Management
- c. Research and implement alternative methods to complete time and effort certifications - Julie Carbone, Financial Controller

3) Timing:

- a. Revise and formalize procedures for time and effort certifications – February 2020
- b. Grants department reorganization - August 2020
- c. Research and implement alternative methods to complete time and effort certifications - December 2020