Supportive Services for Veteran Families (SSVF) Webinar Series

SSVF Compliance
Federal Financial Report (FFR)
Close-out and "Ask the Auditor" Series - Administrative Costs

August 8, 2018
Link to Audio Recording
Presenters

Jeffrey Houser, SSVF Compliance Officer

Robert Thompson, SSVF Project Coordinator

Rico Aiello, SSVF Project Coordinator

Christina Singleton, Senior Auditor
Internal Controls Assessment Service
Webinar Format

- Webinar will last approximately 1.5 hours
- Participants’ phone connections are “muted” due to the high number of callers
- Questions can also be submitted anytime to SSVF@va.gov
QUESTIONS…

Submit questions and comments via the Questions panel

- Reminder, it is the FFR Financial Status Report that needs to be completed and NOT the FFR Cash Transaction Report.

• Along with all other close-out documentation the FSR **must be completed within 45 days of grant close-out.**
  – Those without extensions are due 11/14/18
  – Those with extension are due 12/14/18
  – Note: The “due date” in the Payment Management System is a default date set by the system, however, our program has the earlier due date of 45 days after end of grant, be sure the appropriate date above is adhered to.

• Failure to complete the required FSR on time would result in grant being non-compliant with program requirements and current year funds (FY19) will be frozen until previous year FSRs are completed.
  – It's essential this information is provided to the appropriate staff responsible for Payment Management System draw downs and internal accounting functions.
On the search criteria screen, enter the following:

- **Payee Account #:** full 7 digit number to include the B1 at the end.
- **Reporting periods:** All
- **Delinquent Reports Only:** No
- **Federal Grant ID Contains:** Leave blank
- **Select Report Status:** All
- **Report Quarter End Date:** Leave blank
- **Click Continue**

**Note:** as a PMS end user your query screen will look slightly different but the setup to pull all existing FSRs is the same.
The search will show all FSRs created in the system by HHS for each Account number, both old and current reports. The key at the bottom shows what status each report is in.
Common Errors

• **DO:**
  – Submit on time (within 45 days after grant close)
  – Complete Boxes 10a-c (often times left blank by grantees)
  – Be sure to show funds that were unused.
  – Ensure PMS system user has appropriate permissions to prepare AND submit FSR
    • User accounts can be updated on the PMS website using link under login boxes
  – Ensure FSR reports match your Financial Expenditure Report (excel spreadsheet submitted with End of Year requirement in GIFTS) subaccount expenses.

• **DON’T**
  – Don’t submit the FSR prior to last draw for grant year.
  – Don’t prepare the FSR but forget to certify/submit
  – Don’t leave old reports that have not been completed left uncompleted. All FSRs must be complete.
Lesson Objectives

• Historical background on SSVF Administrative Costs
• Grantee guidance
• Grantee process
• “Ask the Auditor”
• Q & A
• Next Steps
Historical context

• The SSVF grant program allows grantees to spend a maximum of 10 percent for administrative costs.
• Why does SSVF require more admin documentation?
• Why doesn’t SSVF accept my approved indirect cost rate?
Why was my CAP flagged?

• During the most recent monitoring visit you have received a UMP finding in Section G. Financial Management - “Does the grantee identify, track and account for all costs (including administrative costs) charged to the SSVF grant?”
• Provide guidance on how to account for administrative costs
• Process for closing out the CAP flag
Administrative Costs (10% Maximum)

• Under the SSVF Program, a maximum of 10% of supportive services grant funds may be used for administrative costs. Per Section 62.70 of the 38 CFR Part 62,

• Administrative costs are defined as all direct and indirect costs associated with the management of the program. These costs include the administrative costs, both direct and indirect, of subcontractors.

• SSVF requires grantees to provide support documentation (payroll records, invoices, receipts etc.) for all costs and expenses associated with the administration of the SSVF grant.
Administrative Costs

- **2 CFR 200.302**
  - Financial management systems need to include records that are supported by source documentation.

- **2 CFR 200.403(g)**
  - Include factors affecting allowability of costs. For a cost to be allowable, it must meet certain criteria, and adequately supported is listed as criteria. All costs must also be reasonable, and allocable, and accurate.
  - Without the source documentation, and support for the charges for the administrative and payroll costs, we cannot determine if they are reasonable, or allocable or accurate, or conform to what is included in your approved budget.
Administrative Costs Process
Step 1 - Budget

• Administrative section of an SSVF program budget. (approved by the Program Office)
• Include narrative detail
• Detailed breakout of administrative cost categories
• Grantee must not exceed 10 percent of the total award
Admin Costs Process
Step 2 – Admin logic

• Develop the “logic” behind each line item
• Logical connection between method used to account for the cost and the benefit
• Reasonable, Allocable and Accurate
• Examples:
  – Supporting documentation directly supporting costs
  – Allocation Table

• Methods
  – % of time & effort
  – % of overall FTEs
  – % of square feet utilized
  – % of transactions
  – % of units of service
<table>
<thead>
<tr>
<th>SSVF PROGRAM ADMIN EXPENSES-2015</th>
<th>Total Agency Cost</th>
<th>SSVF Costs-Not Billed</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) Indirect Admin Time 100% Of M&amp;G Staff - Payroll &amp; Taxes</td>
<td>$514,661.00</td>
<td>$108,079.00</td>
</tr>
<tr>
<td>Indirect Admin Time 21% Of M&amp;G For SSVF Program Costs - Payroll &amp; Taxes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2) Related Fringe Benefits 100% Of M&amp;G $2255.00 X 24 = $54,120.00</td>
<td>$54,120.00</td>
<td>$11,365.00</td>
</tr>
<tr>
<td>Related Fringe Benefits 21% Of M&amp;G Costs For SSVF Program</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3) Annual Audit Fees $33,750.00</td>
<td>$33,750.00</td>
<td>$7,087.50</td>
</tr>
<tr>
<td>SSVF Share Based on Grant Being 21.0 % of Agency Budget = $33,750.00 X 21%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4) Payroll Fees Total Agency $ 2465.80 Per pay Period X 24 = $59,179.20</td>
<td>$59,179.20</td>
<td>$11,640.96</td>
</tr>
<tr>
<td>SSVF Cost $40.42 Per Employee X 24 Pays X 12 Employees = $11,640.96</td>
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<td></td>
</tr>
<tr>
<td>5) Gen &amp; Professional Liab. Ins - $21,697.00 (100% )</td>
<td>$21,697.00</td>
<td>$4,556.00</td>
</tr>
<tr>
<td>Gen &amp; Professional Liab. Ins - 21% For SSVF Program</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6) Insurance Umbrella Policy - $7,277.00 (100% )</td>
<td>$7,277.00</td>
<td>$1,528.00</td>
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<tr>
<td>Insurance Umbrella Policy - 21% For SSVF Program</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7) Insurance Property &amp; Casualty - $17,913.00 (100% )</td>
<td>$17,913.00</td>
<td>$3,762.00</td>
</tr>
<tr>
<td>Insurance Property &amp; Casualty - 21% For SSVF Program</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8) Director's &amp; Officer's Insurance - $5,480.00 (100% )</td>
<td>$5,480.00</td>
<td>$1,151.00</td>
</tr>
<tr>
<td>Director's &amp; Officer's Insurance - 21% For SSVF Program</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>$714,077.20</strong></td>
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</tbody>
</table>

**ACTUAL SHARE OF SSVF PROGRAM'S ADMIN COSTS:** $149,169.46

**SSVF ADMIN BUDGET ALLOWED:** $86,624.00

**Cost above Indirect Cost Allocation:** $62,545.46
Administrative Costs Process
Step 3 - Documentation

- Payroll records
- Personal Activity Report (PAR)
- Time Study
- Invoices
“Ask the Auditor”

Christina Singleton
Senior Auditor: Internal Controls Assessment Service (ICAS)
Grants Review Division, Office of Internal Controls
Scenario 1

- Admin costs are not based on actuals. The grantee charges for admin costs based on a percentage (they look each month at total admin expenses, compare to their revenue for that month, and calculate a percentage of admin to revenue; if over 10%, which it always is, then they charge 10%). This is true of all costs, including admin staff time, which is also not based on actuals, but instead based on the same process to get at a percentage.
Scenario 2

• To identify, track and account for all administrative costs, all Administrative staff are completing a one month time study to determine the percentage of time each staff designates to SSVF activities. At the conclusion of the time study, the Fiscal Director will calculate the percentage of time for each Administrative function (Fiscal, Human Resources, CEO, Deputy Director, Data, etc.) This percentage will be used to allocate administrative costs each month. The percentage of time will be used to proportionally charge for administrative costs.
Scenario 3

Is this allowable?

Grantee’s approved Admin budget includes the following:

- CFO 2% of salary
- Executive Director 2% of salary
- Liability insurance 5% of costs
- Audit costs – 1% of costs

Budget to Actual Financial EOY Results include:

- CFO salary (1%)
- Executive Director Salary (3%)
- HR director (1%)
- Finance Director (1%)
- Liability insurance (2%)
- Audit Cost (1%)
- Supplies (1%)
**Scenario 4**

- Grantee estimates administrative costs at the beginning of the year to be $24,000. This is less than the actual administrative costs. Grantee then divides the $24,000 by the 12 month program year, and charges a flat $2,000 every month to cover admin. Grantee can provide an estimate of hours worked on admin, however a formal time study has not been completed.
Scenario 5

- Grantee's admin costs are either directly charged to the grant, or admin staff time has been determined using a time study. Subcontractors breakout all admin costs and allocate some costs based on space, FTE etc. All backup documentation provided and reviewed.
Scenario 6

• All administrative staff track their exact time worked on SSVF, and all administrative costs are allocated based on exact spending for things like postage, based on the number of employees for the program for things like telephone, or based on the proportion of overall square footage that the SSVF staff/program take up relative to the whole organization.
Scenario 7

• Time studies are not completed to justify the amounts being charged to SSVF for administrative staff. The ED does not complete a timesheet.
Scenario 8

- The grantee only charges for admin staff costs under admin. They have a monthly system time study system where staff under admin are paid based on the number of SSVF clients in the program. At the end of each month the finance staff looks at all clients in all programs, determines how many clients are in SSVF, and then allocates admin staff salaries based on the number of SSVF clients in the program for the preceding month. They assess monthly to gauge a real-time estimate on the amount of time that the admin staff work on each program.
Questions

• For questions related to FFR FSR (Financial Status Report) submission requirements, please contact Robert Thompson at:
  – robert.thompson2@va.gov or
  – By phone: 412-335-8966

• For questions related to Administrative Costs, please contact Rico Aiello at:
  – Riccardo.Aiello@va.gov
  – By phone: 215-284-8896
Next Steps

• Grantee will receive a request in GIFTS to schedule a CAP Flagged follow-up with Rico Aiello Riccardo.Aiello@va.gov

• Expectations:
  – Provide evidence and documentation that the corrective action plan has been addressed and can be closed out
  – Submit a plan to address the administrative cost finding
Supportive Services for Veteran Families

Thank you

Powerpoint Presentation will be posted on
http://www.va.gov/homeless/ssvfuniversity.asp

Questions?
Go To: http://www.va.gov/homeless/ssvf.asp
Email: SSVF@va.gov