



**U.S. Department of  
Housing and Urban  
Development**

**Office of Housing Counseling**

**Model  
Personnel  
Activity  
Reports  
(PAR) that  
Comply  
with OMB  
Circular  
A-122**

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## Introduction

The Office of Management and Budget (OMB) *Circular A-122: Cost Principles for Non-Profit Organizations* defines costs that non-profit organizations may allocate to grant awards and defines how non-profit organizations must account for the costs.<sup>1</sup> Housing counseling AGENCIES (HCAs) should adhere to OMB Circular A-122's guidance concerning personnel records management in order to maximize the impact of their grant funds and to also avoid grant noncompliance issues. The following is a comprehensive overview of sections within the circular which pertain to housing counseling personnel recordkeeping.

While compliance with OMB Circulars is expected, this should be done in context of compliance with the various HUD regulations that intersect with these requirements. Specifically, the HUD Housing Counseling Handbook 7610.1-REV5 (HUD Handbook) provides HCAs with guidance on supervisory review of employees' client activity, record keeping, client file management, and proper follow-up with clients. These compliance elements must be considered as an HCA develops a universal compliance strategy to meet each requirement irrespective of origin. Compliance with the requirements in this OMB circular alone is not sufficient. Rather, in addition to the applicable OMB Circulars (A-110, A-122, A-133), each HCA must also comply with the HUD Handbook in tandem with all other laws, rules and regulations.

## Understanding OMB Circular A-122

HUD-approved housing counseling agencies are required to use OMB Circular A-122's guidance concerning reimbursement requirements for costs incurred under federal grant awards or contracts. Costs are considered as direct or indirect:

Costs must be reasonable and allocable under a grant award and be incurred specifically for the grant award

### Direct Costs

Specific and identifiable costs that are incurred to provide services or products for a grant award, service, or activity, such as a housing counselor's salary and benefits.

### Indirect Costs

Costs that cannot be identified for a specific grant award, service, or activity of an organization, but are incurred as the result of multiple grant awards, services, or activities. Indirect costs generally fall within two categories: facilities and administration.

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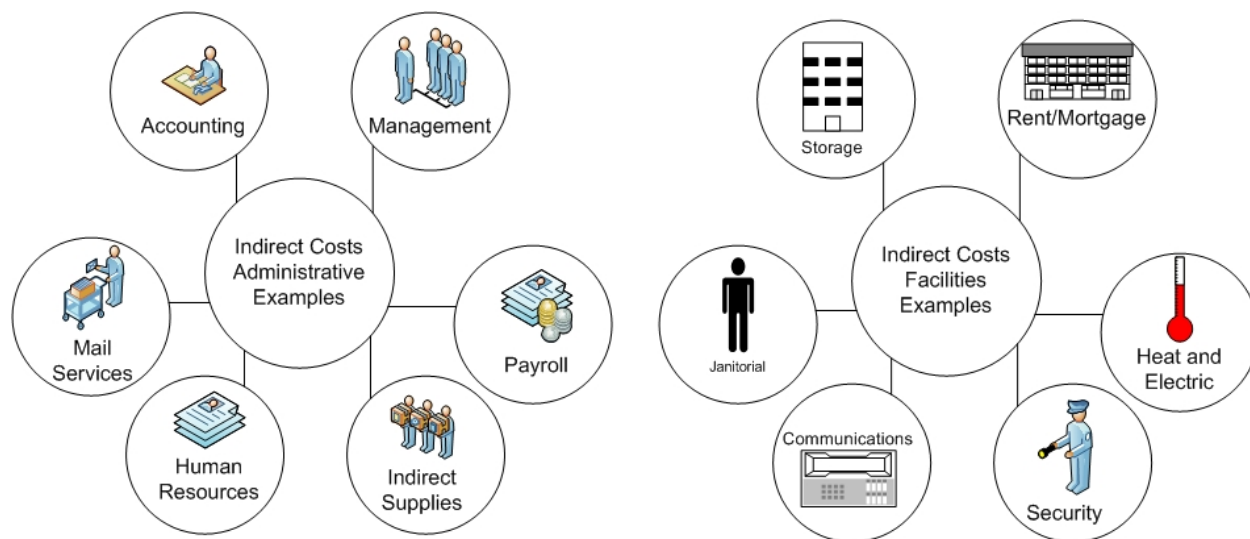
<sup>1</sup> A full-text copy of OMB A-122 can be found at [http://www.whitehouse.gov/omb/circulars\\_a122\\_2004](http://www.whitehouse.gov/omb/circulars_a122_2004).

**TIP** Written agreements can be obtained for questionable costs if obtained prior to incurring the cost. A local housing counseling agency seeking a waiver or written agreement should contact their HUD intermediary; or, if they have received a direct grant from HUD, their local Grant Technical Representative.

## Indirect Cost Examples

- ✓ The salary and benefits of the Executive Director (ED) of an organization with multiple programs beyond housing counseling can be an indirect cost when an organization employs a program manager to oversee housing counseling activities and the ED's salary and benefits are not directly allocated to a counseling related grant. Although the ED is crucial to the organization's operations, the salary and benefits are not directly allocated to a specific housing counseling grant.
- ✓ The building operations and maintenance expenses of a building owned by an organization.

The figure below shows several examples of indirect administrative costs, and indirect facilities costs.



## OMB Circular A-122 Attachment B- Selected Items of Cost

The predominate cost associated with providing housing counseling services under a grant is personnel compensation.

Compensation can include, but is not limited to, salaries, wages, directors and executive committee member's fees, incentive awards, fringe benefits, pension plan costs, allowances for off-site pay, incentive pay, location allowances, hardship pay, and cost of living differentials.

Organizations must maintain reports that identify the distribution of work activities for each employee (professionals and nonprofessionals)<sup>2</sup> whose compensation is charged, in whole or in part, directly to awards. In addition, organizations must

include work activities of employees who perform two or more functions or activities if a distribution of their compensation between the functions or activities is needed to determine the organization's indirect cost rate(s).

Reports maintained by non-profit organizations to satisfy these requirements must meet the following standards:

- ✓ The reports must reflect an after-the-fact determination of the actual activity of each employee. Budget estimates (i.e., estimates determined before the services are performed) do not qualify as support for charges to grant awards.
- ✓ Each report must account for the total activity for which employees are compensated and that are required to fulfill their obligations to the organization.
- ✓ The reports must be signed by the employee, or by a responsible supervisory official who has firsthand knowledge of the activities performed by the employee. The distribution of activity should represent a reasonable estimate of the actual work performed by the employee during the periods covered by the reports. It is suggested that both the individual employee and responsible supervisory official sign the report.
- ✓ The reports must be prepared and completed by individual employee and signed by the agency manager each pay period or once each month as long as the report coincides with one or more pay periods. No report should encompass partial pay periods.
- ✓ Charges for the salaries and wages of nonprofessional employees, in addition to the supporting documentation, must also be supported by records indicating the total number of hours worked each day maintained in conformance with the Fair Labor Standards Act (FLSA) (29 CFR Part 516). For this purpose, the term "nonprofessional employee" shall have the same meaning as "nonexempt employee," under FLSA.
- ✓ Salaries and wages of employees used in meeting cost sharing or matching requirements on awards must be supported in the same manner as salaries and wages claimed for reimbursement from awarding agencies

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<sup>2</sup><http://www.flssa.com/coverage.html>

## Allocable and Allowable Costs

Within any grant program, there is an important distinction made regarding direct allocable costs and direct allowable costs.

**An allocable cost** is that which directly benefits the stated grant activities, but is reported as a *percentage* of the costs involved.

**An allowable cost** is that which directly benefits the stated grant activities and is reported as directly related to the activity performed (i.e. cost of clients served). Allowable costs are generally allocated at 100% of cost.

The difference between allocable costs and allowable costs associated with a grant are defined in the example below. Here, a housing counselor's salary is considered an allowable cost as it is used to directly serve clients. The Director of Housing Counseling's salary, on the other hand, is an allocable cost represented by a percentage (25%) that corresponds with the percentage of the director's time directly benefitting the program.

**TIP** The percentage of time allocated by a staff member may not exceed 100%.



## Administrative Costs

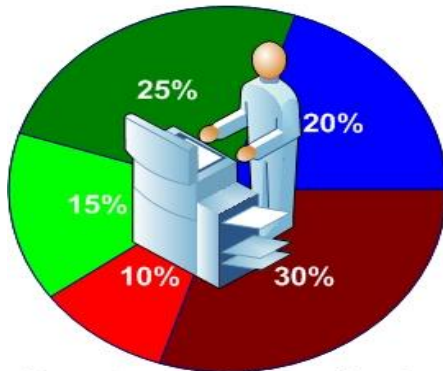
Administrative costs can be either directly related to the grant activity, or can be indirectly related to the grant activity. The examples below show how you can distinguish between direct and indirect costs of administrative activities.

**Direct Administrative costs** are those which can be attributed to specific administrative activities related to a specific grant program area. In the graphic below, copying services are shown as an administrative cost split between five program areas.

**Indirect Administrative Costs** are those costs which cannot be identified readily and specifically within a particular program area. In the graphic below, a receptionist's salary is shown as an allocable indirect cost as it is difficult to determine exactly how the receptionist's time is split among four programs.

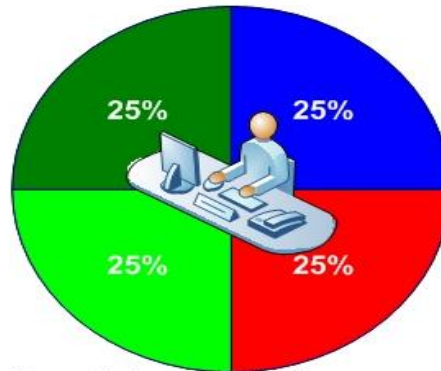
## Administrative Costs

Allocable Direct Administrative Costs



Percentage of copying services by five program areas. Costs can be identified readily and specifically with a particular program area.

Allocable Indirect Administrative Salary Costs



Receptionist utilized by four program areas. Costs cannot be identified readily and specifically with a particular program area.

Within your calculation of indirect costs, it is important to consistently and accurately gauge the usage of this receptionist within each program area. If you have four equally sized and weighted program areas with fairly equal workloads for this receptionist, then it would be appropriate to assign each program area with 25% of the costs associated with this administrative activity.

## Indirect Cost Rate

Agencies incurring indirect costs associated with a grant activity cannot automatically seek reimbursement for those costs. When you are seeking reimbursement for indirect costs within a grant program, it is important to contact your Government Technical Representative to establish your proposal for an indirect cost rate. *Only after receiving an approved indirect cost rate* will you be able to seek reimbursement for such costs. In many cases an agency will seek out other private fundraising dollars, or other non-federal dollars to cover indirect costs in order to avoid the process of applying for an indirect cost rate approval.

## Implementing Practices in Compliance with A-122



This section describes business practices that agencies can implement to comply with OMB Circular A-122.

### Personnel Activity Reports (PARs)

The primary element in any agency's approach to being compliant with OMB Circular A-122 is to develop and implement a Personnel Activity Report (PAR) for every staff member whether their costs are direct or indirect. A PAR allows an agency to accurately report the amount of time each staff member spent performing various activities under specific grants. Using a PAR for one grant is relatively simple. However, most housing counseling agencies have multiple sources of funding, many of which are federal sources of funding that require adherence to OMB A-122. The PAR is spreadsheet or other form that allow an agency's staff to record the time they spend performing specific activities.

**TIP** The PAR must always record actual time and activities of each staff member. Time budgets, time estimates, or other projections of staff time and activities should not be recorded on the PAR. Prior to recording activity on a PAR, an agency must implement effective processes, procedures, and policies to ensure that data recorded on the PAR is accurate.

**TIP** Attachment 1, a Microsoft Excel spreadsheet, provides an example of a PAR.

### PAR Signature Line

Each employee and the employee's supervisor are required to sign and date the PAR. This signature affirms that the report coincides with one or more pay periods and has been prepared at least monthly. The supervisor must have firsthand knowledge of the activity performed by employee. The employee has to affirm with his/her signature that this report is an after-the-fact determination of actual activity for the referenced pay period. Whether these affirmations are stated in writing located at the signature line or are found on elsewhere on the PAR, it is advisable that the PAR contain some variation of acknowledging language affirming these items.



## Managing Personnel Time with PARs



Recording and reporting time on a PAR can be accomplished through several methods ranging from paper-based time sheets to computer software designed for time reporting to sophisticated software integrated with accounting, project management, or payroll systems. The most important aspect of implementing a time reporting process is to establish a set of policies and procedures that can be consistently used throughout an agency.

### Time Keeping Practices

#### Contemporaneous Versus Reconstructive Time Keeping

Procedures and policies that dictate how counselors are to record their time should specify if time is to be recorded as they perform activities or recorded at some specified time after they have performed activities. If counselors enter time keeping records after providing services (called reconstructive time keeping), they need to rely on notes, call logs, client management systems, and emails to reconstruct the required time keeping records. A best practice would be for counselors to use contemporaneous time keeping, which involves entering time spent on eligible activities as the activities are being completed throughout the day.

Contemporaneous time can be captured through time entry software or a log system. Although many counselors use the reconstructive method, or attempt to blend the two methods, contemporaneous time keep is always a more accurate detailed account of time than a reconstruction of activities. Reconstructive time keeping can be used, while not the preferred method, as long as the agency employs the use of time capture software or technology that time stamps the activities of staff in a log format.

**TIP** An agency should survey their staff to determine the methods and behaviors most often used for time keeping in order to establish consistencies throughout the agency.

#### Contemporaneous Time Keeping Best Practices for Housing Counselors

The use of contemporaneous time keeping can be difficult for those individuals who are accustomed to reconstructive time keeping. Counselors need to understand how their activities and actions involving clients translate into grant dollars and program income. The greater knowledge counselors have regarding how keeping their time contemporaneously translates into actual revenue, the more accurate and timely these time keeping practices will become. Specific employee performance goals should be employed to make sure each staff member understands that proper timekeeping supports programmatic success.

Many agencies place the mission of serving clients over the importance of administrative tasks of time keeping. When agencies serve clients, the first step is usually the client intake process. However, if you are to take a holistic view of the client case cycle, the first step in the client intake process is the proper time keeping of the previous client in order to generate the proper revenue to keep the program running.

### **Reconstructive Time Keeping Best Practices of Housing Counselors**

Reconstructive time keeping is a process that can be used when contemporaneous time keeping is not conducive or productive. During workshops, group events, or days where clients are scheduled back-to-back, a counselor may not be able to stop counseling activities to perform contemporaneous time keeping activities. Below are best practices for reconstructive time keeping:

- ✓ Use case notes, call logs, workshop logs, or other documentation to help reconstruct time spent within each grant activity after active counseling activities have been completed
- ✓ Not perform time keeping functions in front of clients to avoid presenting the image that the counselor is more focused on capturing time versus providing counseling services
- ✓ Not be used to make up for unaccounted time during contemporaneous time keeping
- ✓ Avoid use of average or estimated time taken for a specific activity or task

### **Integrating PARs with Client Management Systems**

The two most widely used Client Management Systems (CMSs) are CounselorMax and Home Counselor Online (HCO). Each CMS provides a client activity log that includes fields for time spent with each client. This time entered for specific client activities can be used to support the PAR. The data collected from these client activity logs can be exported from the CMS and analyzed for input in the PAR. Many times the data collected in the CMS presents a level of detail not required for the completion of a PAR. While it is recommended that the PAR include a column for documenting the source of the data, it is not necessary to include in a PAR the level of detail that can be exported from many of these CMSs. Many CMSs allow for the allocation of a specific client to a particular grant in the client intake process. Agency staff should have a clear understanding of each grant funder's requirements and ensure that they allocate a client to the appropriate funding source.

**More than 25 CMSs have met HUD standards and more than 30 CMS' are in the process of meeting HUD's standards.**

Based on the advances with CounselorMax, HCO, and other systems, there are several reports that can be pulled into the PAR to accomplish many of OMB A-122's requirements. However, there are specific requirements that must be adhered to with respect to PARs that cannot be met by existing client management systems. HUD-approved organizations have expressed to both HUD and CMS developers the need for integration of systems for improved data importing and exporting. The integration of the PAR and a CMS is the preferred alternative, with the ability to manually update the PAR as needed.

## Source Documents substantiating PARs

Within an organization's accounting department, or during the normal course of business, each organization collects, creates, transmits and receives documentation related to income and expense of revenues. The identification, classification, and archiving of these documents is critical to any agency's compliance with basic accounting standards, but more importantly, compliance with various OMB circulars. Examples of source documents include vendor invoices, bank statements, credit card statements, cancelled checks, and payroll records.

## Comparing Categorical Time Budget Data to your PARs

Agencies should consider completing a quarterly Categorical Time Budget for each employee. A Categorical Time Budget will determine how that employee's time will be distributed among specific categories of work as needed to reach grant performance goals, stay compliant with regulations, and meet client needs. Activity categories that can be included in the time budget include: direct client interaction, file administration, grant reporting, program outreach, and training and professional development. After each quarter, agency staff should compare the Categorical Time Budget distribution to the employee's PAR data.

Categorical Time Budgets are beneficial as they ensure that previous estimates used to determine projected costs in the pre-award phase of grant remain accurate through the entire grant cycle. The initial Categorical Time Budget should be completed by the individual staff member, and managers should review these budgets for anomalies or discrepancies.

While PARs provide grant-related time tracking, the use of a time budget can be a organization-wide way to track a staff member's total time allocation across multiple grants including indirect cost-related time which are not allocated to a particular grant activity. Thus, the use of a time budget should cover both direct and indirect costs.

**TIP** Agencies can use PARs to monitor and manage counselor time as related to **cost-per-client ratios**. Cost per client ratios are scored when an agency applies for HUD funding. Agencies may lose critical points on the funding application if their cost-per-client ratios are deemed too high or too low.

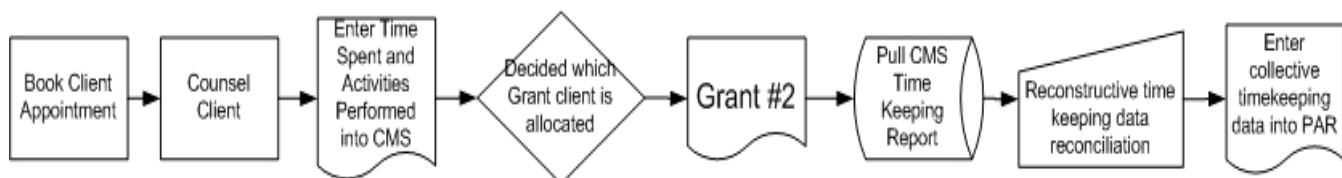
## Step-by-step Examples of Counseling Activities Captured in a PAR

**Basic example.** In this example, a housing counselor is serving a client and plans to bill all client activities to one grant. Refer to Graphic #1 on the following page to see the counselor activities that will be captured in a PAR.

1. Field incoming phone call and schedule client in electronic calendar system.
2. Email or mail intake documents needed prior to the counseling session.
3. Counsel the client.
4. Complete data and document input into CMS, including counseling notes.
5. Determine the grant in which the client activity will be assigned.
6. Using the client management system or timekeeping software pull a timekeeping report.

7. Determine any other time or activity related to the client that needs to be added to the timekeeping report pulled from the CMS, i.e. Reconstructive Timekeeping.
8. Enter collective timekeeping data into PAR.
9. Review the PAR with appropriate supervisor as necessary.
10. Counselors and Supervisor sign PAR using agency's PAR completion schedule.

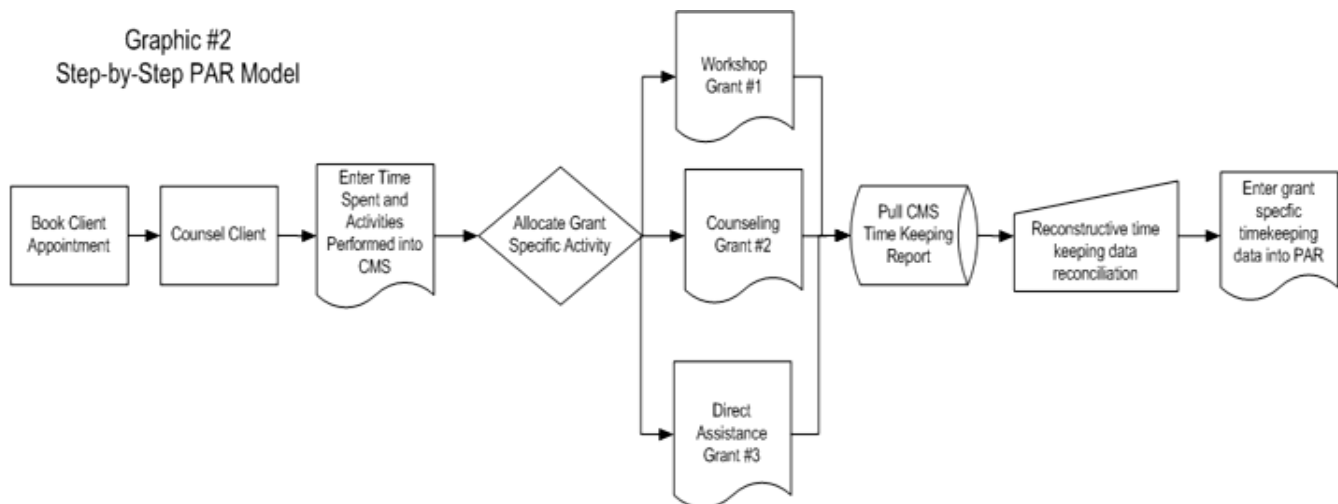
Graphic #1  
Step-by-Step PAR  
Model



**Advanced example.** In this example, a housing counseling agency provides one client with three separate services, and will bill each service to three separate grants. Refer to Graphic 2 on the following page to see the counselor activities that will be captured in a PAR.

1. Field incoming phone call and schedule client in electronic calendar system.
2. Email or mail intake documents needed prior to the counseling session.
3. Counsel the client.
4. Complete data and document input into Client Management System CMS, including counseling notes.
5. Determine and notate the grant in which the client activity will be assigned. A separate client file in an agency's CMS may need to be created depending on the level of activity and scope of the different grants.
6. Using the CMS or timekeeping software, pull a timekeeping report and separate by grant in which it will be reported.
7. Determine any other time or activity related to the client that needs to be added to the timekeeping report pulled from the CMS, i.e. Reconstructive Timekeeping.
8. Enter grant-specific timekeeping data into PAR.
9. Review the PAR with appropriate supervisor as necessary.
10. Counselor and Supervisor sign PAR using agency's PAR completion schedule.

Graphic #2  
Step-by-Step PAR Model



## Common Housing Counseling Agency Grant Reporting Mistakes

### Redirecting Resources Covered by a Grant to Activities Not Covered by a Grant

An agency applied for a foreclosure prevention services grant with the expectation that a specific housing counselor's salary and benefits would be covered by this grant award. During the award period, foreclosure prevention activity was not as high as anticipated so the counselor's duties were expanded to include activities *not* covered by the award, which may lead to grant noncompliance. To avoid this happening in the future, the agency management must have a clear plan to market each counseling service to ensure the expected volume of clients to meet grant requirements. In addition the agency must ensure that any staffing allocation changes are supported by those grants that are being used for the activities. Personnel activity reports can assist this agency in tracking employee time related to each grant activity. The program manager in charge of staff time allocation must also be fully aware of each grant's guidelines and limitations. There must be communication between the direct client program functions of an agency and those functions performed by accounting and grants management.

### Reporting Activity Not Covered by the Grant Agreement

A grant award for rental counseling services has a grant period beginning October 15th. The October report included the clients counseled for the *entire* month of October because the reporting agent didn't refer to the grant agreement that specified the start date of the grant period. This can be avoided by referencing the grant agreement each time a report is completed.

### Reporting the Same Costs to Multiple Grant Awards

An agency received a state grant and a HUD grant covering similar counseling activities. Training costs were allowable expenses under both grants. The agency sent an employee to an appropriate training class, but billed the employee's tuition to both grants. The program manager didn't record all the expenses reported to each grant and reference them as they completed the report on the other grant. This could have been avoided if the program manager made a comprehensive list of costs incurred and allocated those costs to each grant.

### Inaccurately Allocating Indirect Costs to a Grant Award

An agency received a HUD grant to cover direct and indirect costs related to homeownership education, foreclosure prevention, and HECM counseling. The agency also received a grant from a local county government to cover foreclosure prevention workshops. The agency allocated indirect space rent for the foreclosure workshops to both awards, which is an inappropriate cost allocation to the HUD grant. The agency did not use a tracking method or documentation related to the use of the space to indicate that the space was used solely for foreclosure prevention workshops. There must also be documentation (i.e. a lease) or cost itemization that clearly defines the lease terms. If a workshop takes 10 hours to perform, the monthly cost to rent this space should be prorated to show the actual cost to rent this space for the specific grant activity. *If this space is used at different times for other purposes, only the cost to use the space for the specific grant activity is an allowable grant expense.* To remedy this situation, the agency can use a calendar or other time tracking method to ensure indirect costs are not allocated to two separate grants.

## Adhering to OMB A-122: Best Practices

### Corporate Governance

While most housing counseling agencies believe that the mission and purpose of their agency connotes a built-in adherence to ethics, stated values and acceptable professional conduct, this is not sufficient. Each agency needs to delineate their core values, ethical standards, and a code of professional conduct by which their organization operates. The effective and practical implications of having these documents will mean a more accurate and meaningful accountability to funders, clients and employees alike.

A Statement of Values, Ethical Standards, and Code of Conduct should include how each item assists the agency in being accountable, honest, and transparent. The agency should have a set of standards that prevents and discloses conflicts of interest. In some cases, the expectations surrounding a nonprofit organization's operations and activities can be *higher* than that of public sector or private sector counterparts. This heightened expectation in accountability stems from the organization's stated mission to serve the community, to help those in need, or to help solve a social problem. A lack of focus on corporate accountability can have a negative impact on a non-profit organization's ability to serve its intended mission.

## National Industry Standards for Homeownership Education and Counseling

HUD encourages housing counseling agencies to adopt the National Industry Standards for Homeownership Education and Counseling, and to have all agency employees sign the National Industry Standards Code of Ethics (“Code of Ethics”) and Conduct for Homeownership Professionals (“Conduct”).

The Code of Ethics and Conduct standards should be adhered to in an organization’s daily activities. These standards set a high bar for homeownership educators and counselors. By adopting these standards an organization can help display its commitment to both the community and to compliance requirements. This set of standards includes housing counseling agency compliance with important OMB circulars related to agency recordkeeping and reporting requirements.

**TIP** For more information about National Industry Standards for Homeownership Education and Counseling, visit [www.homeownershipstandards.com](http://www.homeownershipstandards.com).

## Executive Administration Responsibilities

Accountable governance starts at the top. Board and Executive Administration structure, composition and responsibility are all guided by an organization’s focus on accountability. This accountability is guided by a variety of elements including adopted documents that align employee activities with the agency’s mission.

## Goal Setting and Employee Performance Measurement

While PARs track activities that have already occurred, the best way to ensure maximum grant utilization is to implement an employee performance plan with rigorous goal setting. Employee performance plans need to include both individual employee performance goals and team-oriented goals.

## Employee Performance Plan

The most successful housing counseling agencies use an annual employee performance plan. The basic components of this plan include a training and professional development schedule, professional networking opportunities, and direct client activity related goals such as:

- ✓ Number of new clients to counsel
- ✓ Number of files closed out
- ✓ Number of workshops conducted
- ✓ Number of open client files

Quality control related goals can also be included in employee performance plans, including

- ✓ Client no-show rates
- ✓ Client satisfaction rates

## Goal Setting

Housing counseling agencies need set proactive goals that directly relate to client activities and outcomes. Setting a goal for the number of clients each housing counselor intends to counsel within a specified timeframe helps counselors manage their schedules and keeps them focused on grant activities. Goals can also be used to help with the administrative burden that comes with adhering to various grant reporting requirements. Because many required reports depend on accurate data entry, or contemporaneous time keeping, including these activities in employee performance plans helps emphasize their importance and ensure that accurate information is recorded.

## Employees Performing Activities Billed as Indirect and Direct Costs

In many housing counseling agencies the activities that can be allocated to indirect costs are conducted by individuals who also perform activities that can be allocated to direct costs. Whenever possible, agencies should limit the number of employees who perform functions within both types of cost centers. Most housing counselors who do not perform any supervisory role should be able to account for their time as direct costs. Most housing counseling executive managers, directors, and accountants should have limited direct interaction with clients to limit the confusion that is created when attempting to accurately complete a PAR. If executive management or other administrative staff is required to have direct client interaction, this could be accounted for with the use of a separate column on the PAR that clearly indicates if the activities are indirect or direct.

## Single Client, Multiple Activities, Multiple Grants

Maintaining time records is complex when counselors provide multiple services for a client and becomes very complex when counselors provide multiple services under multiple grants for a client. In many cases when a client approaches a housing counseling agency it is not known which service(s) a client may need or which grant will be used to provide funding for the services. When an agency has separate grants that fund separate activities that could involve a single clients, the agency must clearly delineate the activities. Clear delineation of counseling activities can be accomplished through division of labor or a separate case identification number for the separate activities.

**There are strict prohibitions against billing a single client activity to two separate funders, effectively being paid twice for a single activity.**

## Role of the Intermediary in OMB Circular A-122 Compliance

In every grant agreement with each sub-grantee, affiliate, or other partner whose activities fall under the compliance areas outlined in OMB Circular A-122, there should be specific language regarding how each partner is expected to comply with these requirements. In addition to specific contract language, each intermediary should take steps to complete the following tasks to ensure every down-line cost is properly accounted within each grant award.

- ✓ Train sub grantees on compliance with OMB Circular A-122
- ✓ Perform audits of sub-grantee compliance with OMB Circular A-122
- ✓ Identify all grant sources for each sub-grantee, cross reference each grant received by a sub-grantee to ensure they don't conflict with the grant awards provided by the intermediary



- ✓ Provide technical compliance assistance to sub-grantees
- ✓ Allow for timely submission of PARs through the use of an online document uploading system
- ✓ Compliance with OMB A-122 is the equal responsibility of both parties

## **Practical Implications Learned From OMB A-122 Noncompliance Findings**

Nonprofit organizations found deficient in their accountability to tax payers or funders are typically found to have weak adherence to OMB Circulars and/or general accounting standards. In some instances agencies claim that accounting activities are burdensome and hinder mission-oriented work, such as serving clients. This claim is buffeted by the reality that an organization's ability to serve clients is severely curtailed when funding is withdrawn due to a lack of accountability.

## Frequently Asked Questions about Personnel Activity Reports

### **What is a Personnel Activity Report (PAR)?**

**Answer:** A PAR is a time reporting tool that is required to be completed by any employee who has performed work under a HUD housing counseling grant or other federal grant.

**Do:** complete a new PAR each time one is required

**Don't:** reuse a PAR with previous month's activities

### **What is after-the-fact time recording mean?**

**Answer:** creating an entry for an activity after the activity has been completed

**Do:** follow contemporaneous and reconstructive timekeeping best practices

**Don't:** falsify activity entries on the PAR

### **Does each employee of an organization have to complete a PAR?**

**Answer:** Only employees whose time will be allocated and reported to a grant are required to complete a PAR.

**Do:** implement the practice of having every employee complete the PAR and determine if there are indirect costs which are going unreported

**Don't:** complete a PAR until after grant related activities have taken place

### **How often does an employee have to complete a PAR?**

**Answer:** The reports must be prepared and completed by individual employees and signed by a agency manager each pay period or once each month as long as the report coincides with one or more pay periods. No report should encompass partial pay periods. The decision to complete these reports at intervals greater than one pay period must be made by the agency executive management considering other grant management strategies which may conflict with this guidance.

**Do:** input data into the PAR throughout the reporting period

**Don't:** fabricate timekeeping data. Use reconstructive timekeeping methods only when backup data is available

### **Is there a required PAR format?**

**Answer:** No

**Do:** Use a format that is simple and allows for someone to enter multiple entries for multiple grants. Suggested data points for entry include: Agency name, employee name, date, grant number, activity type and activity time.

**Don't:** Don't forget to include signature lines!

**Appendix: Acronyms**

OHC	Office of Housing Counseling
HUD	Department of Housing and Urban Development
PAR	Personnel Activity Report
GTR	Government Technical Representative