

MICHIGAN ECONOMIC
DEVELOPMENT CORPORATION

PURE *M*ICHIGAN®

Positive Timekeeping for

Federal Funding

Introduction

Positive Timekeeping is the process of documenting how much time each employee spends working on each program/funding source per pay period in order to comply with federal grant requirements.

Anyone charging any time to a federal funding source is required to track all their working hours by funding source.

Why do Positive Timekeeping – Federal Regulations

2 CFR 200 outlines the requirements for charging staff time to a federal grant.

- Time records must be recorded by the organization.
- Estimates alone are not sufficient, time allocations must be based on **actual records** of time worked.

Failure to maintain proper records may result in repayment of grant funds.

Administrative Activity Reporting

- Must be documented in payroll system tracking the time spent on activities for the federal award and non federal activities.
- Lines must be for single days (no date ranges).
- Exported reports from payroll system should be saved for audit purposes.

	A	D	E	G	H	I	J	K	L
	AY	Comptroller Object Cd Desc	Grant Num	Grant Num Desc	Emp Full Name (L)	Emp Id	Pay End Date	Pay Period Num	Hours
18	2024	REG HOURS 1ST SHIFT - CLASS EMPLOYEES	2024	SLFRF Grant	LAST, FIRST M	99999	01/01/2024	16	17.0
19	2024	REG HOURS 1ST SHIFT - CLASS EMPLOYEES	2024	NONFEDERAL	LAST, FIRST M	99999	01/01/2024	17	23.0
43	2024	REG HOURS 1ST SHIFT - CLASS EMPLOYEES	2024	SLFRF Grant	LAST, FIRST M	99999	01/14/2024	16	27.5
44	2024	REG HOURS 1ST SHIFT - CLASS EMPLOYEES	2024	NONFEDERAL	LAST, FIRST M	99999	01/14/2024	17	12.5

De Minimus – Reality Check

De minimis is defined as infrequent, irregular activity that would normally be considered so small that it cannot (and should not) be accounted for. In other words, de minimis can be applied to activities that take a small amount of time and/or occur infrequently, such that the time spent does not measurably impact the effort devoted to cost objectives/programs. Generally, a 5% threshold is used to define when an activity can be considered di minimis.

For reference: there are 480 minutes in an eight-hour work day. 5% of 480 is 24 minutes. Keep good perspective, however: if the activity is routine and recurring, di minimis may not apply.

Thank You

Jonathon Lukco
Strategic Project Specialist
Lukco1@Michigan.org