Training Invoice Questionnaire

The purpose of this questionnaire is to provide - at the beginning of an agreement – an opportunity to confirm with Recipients their understanding of Energy Commission invoicing and record-keeping requirements. Our goal is to both educate new Recipients and to ensure that all Recipients are able to avoid the most common findings that come out of Energy Commission audits. Audit findings often require that Recipients return questioned costs and may jeopardize future grant opportunities.

Not all Recipient project managers will know the answers to the questions below. Usually, employees who work in Accounting, Finance, Human Resources, and/or Payroll are the most qualified to answer the questions. When completing this questionnaire, please work with appropriate departments/personnel to ensure the answers are accurate.

If you have any questions about Energy Commission requirements, please let your CAM know. Your CAM and the Energy Commission’s Auditor can provide clarifications when needed.

**DIRECT LABOR:**

1. Are you seeking reimbursement for actual rates that are paid to the employee, and not estimates?

2. Would you be able to provide the auditor with detailed timesheets that:

• track all hours worked by an individual;

• are broken down into specific activities/projects, including leave, training, administrative time, etc.; and

• can support that time billed is directly related to the grant scope of work?

Timesheets can either be hardcopy or electronic, but they must include evidence that they are completed by the employee, approved by a supervisor, and maintained in a format that cannot be changed after approval.

3. Are the following job classifications included in Direct Labor?

• Executive Officers

• Accountants

• Personnel Officers

• Administrative or Clerical staff

These types of job classifications are typically included in Indirect Costs (i.e. Overhead, or General & Administrative) because individuals in these positions typically do not keep detailed timesheets that track hours charged to specific activities – a requirement for Direct Labor expenses.

However, these charges are acceptable if a Recipient can confirm that they would be able to provide the auditor with detailed timesheets as described above.

4. If the above classifications are included in Direct Labor, can you confirm that detailed timesheets as described above are kept for these individuals?

5. If the above classifications are included in Direct Labor, can you confirm that these job classifications are not double counted in the Indirect Costs?

**DIRECT LABOR AND FRINGE BENEFITS**

6. Do any of the Direct Labor or Fringe Benefits rates charged in the invoice exceed the estimated rates in the agreement budget? If so, please explain why these rates will not cause the Recipient to exceed the total budget for the Direct Labor or Fringe Benefits categories over the life of the grant. If the rates are likely to cause the Recipient to exceed the total budget for the Personnel Category, the CAM and Recipient will need to discuss whether the Recipient would prefer to: 1) charge the additional expenses to Match; 2) request a budget reallocation; or 3) simply not be reimbursed for the overage.

7. Are any consultants being charged under Direct Labor? If so, are fringe benefits being claimed for their labor cost?

If Consultants are included in Direct Labor, Fringe Benefits should not be charged to that labor. Companies do not typically pay for benefits such as medical insurance or payroll taxes for consultants. Therefore, companies should exclude consultant labor costs when calculating the amount of fringe benefits to claim.

**FRINGE BENEFITS**

8. Are you seeking reimbursement for actual rates that are paid to as Fringe Benefits, and not estimates?

9. In the event of an audit, can you provide supporting documentation to support the actual Fringe rate?

10. Have you requested reimbursement by CEC Funds for any Fringe Benefits associated with Direct Labor charged as match share expenditures? CEC Funds can only be used for Fringe Benefits associated with Direct Labor charged to CEC Funds.

**INDIRECT RATE**

11. For entities using a cost allocation plan – and not the CEC de minimis or a Federally-approved rate – are you seeking reimbursement for actual indirect rates, and not estimates?

12. For entities using a cost allocation plan, in the event of an audit, can you provide supporting documentation to support the actual Indirect rate?

13. Have you requested reimbursement by CEC Funds for any indirect costs associated with costs charged as match share expenditures? CEC Funds can only be used for indirect costs associated with costs charged to CEC Funds in other budget categories.