

1. OVERVIEW. As mentioned in Chapter 4, EPA's operating costs are usually charged directly to an appropriation through the Agency's account number structure, e.g., a Superfund employee's pay would be charged to a Superfund appropriation account number (the employee's Fixed Account Number, or "FAN").

However, in cases where employees or non-personnel services or items support more than one office or appropriation, this "direct charge" approach may not be practical. Support services may benefit activities funded from more than one appropriation, but the amount of support benefitting each appropriation cannot be directly measured. As a result, there may be no practical way to track and report which increments of time worked or portion of a purchased item are in support of which appropriation's activities.

In these cases, allocating time worked or other support costs among appropriations is the acceptable method for charging. "Allocation of costs" is a cost accounting technique. To use it, offices which allocate costs must have a measure of benefit, e.g., the ratio of Superfund Full-Time Equivalent (FTEs) to total FTEs, which ratio represents the proportion of service provided to the various recipients of that service. The resulting percentage(s) is multiplied against the support costs or the FTEs and Personnel Compensation and Benefits (PC&B) costs to be distributed. The calculated amounts are then recorded against the respective appropriations. This chapter provides a standard plan for allocating the costs between the Superfund and non-Superfund appropriations. This plan must be adhered to by all offices responsible for distributing support costs or needing to allocate hours worked.

Paragraphs 3 through 7 discuss support (non-PC&B) allocations and Paragraph 8 discusses FTE and PC&B allocations. Instructions and transaction codes for entering the allocated costs into the Financial Management System (FMS) will be provided in RMDS 2530, "Accounting Processes".

2. ROLES AND RESPONSIBILITIES. The Servicing Finance Offices (SFOs) are responsible for monitoring and ensuring compliance with these procedures when the SFO does not do the actual calculations. The SFO will verify that the costs are allocable and will check the accuracy of the distributions to the various accounts.

For Headquarters and related field operations at Cincinnati and RTP, the calculations, which are automated, are controlled by the Program Operations Support Staff, Office of Administration and Resource Management, and are recorded by the Financial Management Division (FMD).

3. OFFICES AUTHORIZED TO USE THE STANDARD SUPPORT (NON-PC&B) PLAN. Offices with allowances under the following hazardous substances program elements must use this plan to allocate the appropriate share of support costs to their Superfund accounts:

a. TERY5A Hazardous Substance - Support Services:
Headquarters

b. TEUY5A Hazardous Substance - Support Services:
Regions

c . TLXY5A Hazardous Substance - Office of Research and Development: Lab Support

Offices not having these Superfund allowances may not use this plan to distribute support costs to a Superfund account.

- 4 . RELEVANT SUPPORT PROGRAM ELEMENTS. This plan continues the Agency's procedure of charging temporarily to a carrier account all support funds under specific support program elements before redistribution to the Superfund accounts. The relevant support program elements under which the costs are initially pooled are:

- a . A4CX5A Nationwide Costs
- b . A4DX5A Headquarters Support Costs
- c . A4EX5A Regional Support Costs
- d . A4FX5A Laboratory Support Costs - R&D

Using the standard plan, authorized offices redistribute the costs from these program elements to the corresponding Superfund program element--e.g., A4CX5A and A4DX5A to TERY5A. (See Figure 5-1, Redistribution of Support Costs, on the following page.)

- 5 . BASES FOR REDISTRIBUTION. Offices may use two bases for their redistribution:

- a . Actual FTE Use. (See Paragraph 6, Section C.)
- b . Authorized FTEs (if certain tests are met). An authorized FTE ratio, based on the October 1 approved operating plan, will be used where obligations are made based on planned FTE usage--e.g., Standard-Level User Charges and direct EPA space leases. Once in place, this ratio may only be adjusted during the year if Congress or OMB makes revisions to the operating plan

FTE levels.

- 6 . STEPS FOR REDISTRIBUTING COSTS. In the discussion that follows, program element A4EX5A, Regional Support Costs, is used to illustrate the procedure for redistributing obligations for support costs to the corresponding Superfund account under program element TEUY5A. Headquarters and Research and Development offices will use the same procedure, with the appropriate accounts, for allocation purposes. The Superfund account structure used below is given as an example and is not mandated. Note that the calculations in each of the following steps are based on cumulative data for the fiscal year.

- a . STEP 1: SEGREGATE SUPPORT COSTS BETWEEN ALLOCABLE AND NON-ALLOCABLE COSTS. There are three basic categories of support costs: Superfund-specific support, program-specific support (nonSuperfund), and general support.

(1) Superfund-Specific Support. The 1988 program element for this category is TEUY5A, and the 1988 account structure is 8TEUXXX700. This category includes costs that can be directly identified with Superfund activities only. These costs will be charged to the Superfund appropriation without allocation.

(2) Program-specific support (NON-SUPERFUND). The 1988 program element for this category is A4EX5A, and the 1988 account structure is 8A4EXXX002. This category includes costs that benefit non-Superfund programs only. These costs will not be allocated to the Superfund program.

(3) General support costs that benefit all programs will initially be recorded in the S&E general support account 8A4EXXX001. A portion of that account will subsequently be allocated to the Superfund appropriation, based on the appropriate FTE ratio. If general support costs are to be allocated on the basis of more than one ratio, it may be appropriate to establish more than one general support account.

b. STEP 2: SELECT THE ALLOCATION RATIO TO BE USED FOR GENERAL SUPPORT. The actual FTE usage ratio will be used for allocating general support, except where the use of the authorized FTE ratio has been certified and approved by the Director, FMD. Specific cost categories that were approved for distribution to the Superfund appropriation in fiscal year 1987 on the basis of authorized FTEs include:

- (1) Nationwide Charges
 - o Standard Level User Charges
 - o Direct EPA Leases (for space only)
 - o Nationwide Security
- (2) Headquarters/Regional Support
 - o Security Services
 - o Health Unit
 - o Facility Maintenance and Other Services
 - o Mail Operations

To apply an authorized FTE ratio to a cost category, the allowance holder or designee must first determine that the authorized FTE ratio is the applicable ratio for that allowance holder's costs. The authorized FTE ratio would be applicable if the level of services contracted for in a fiscal year was based on planned FTE usage.

A good example of this is space leases, where fixed leases are entered into based on space needed to house authorized Superfund and S&E FTEs. If the authorized FTE levels are not achieved, EPA must still pay for the space. Thus, allocation between appropriations based on the authorized FTE ratio would be more appropriate.

Fixed-price contracts for space maintenance or services that are obligated based on planned FTEs are other examples of categories appropriately allocated based on authorized FTE ratios. However, if these contracts were cost type or could otherwise be modified to reflect actual use rather than planned use, then an allocation based on actual FTE use would be appropriate, whether or not the contracts were actually modified.

Generally, contracts awarded after the early part of the fiscal year are not allocated based on planned FTEs because it is reasonable to assume that the obligation reflects information on actual FTE use at the time of award.

The determination that an authorized FTE ratio is the most appropriate must take the form of a written certification by the allowance holder or designee. The certification must be submitted to and approved annually by the Director of the Financial Management Division. The format for the certification is illustrated in Exhibit 2550D-5-1 at the end of the chapter.

c. STEP 3: CALCULATE THE RATIO TO BE USED. Actual and authorized FTE ratios are calculated differently.

(1) ACTUAL FTE RATIO. The actual FTE usage ratio is calculated by dividing total actual Superfund FTEs used by the applicable office or laboratory, by the total actual FTEs used by that office or laboratory. (Total actual FTEs include Superfund, Leaking Underground Storage Tanks (LUST), Salaries and Expenses (S&E), and S&E Reimbursable.) The ratio is calculated using cumulative actual FTEs for the period and is expressed as a percent. (See Figure 5-2 on the following page.)

Where regional laboratory and regional office costs are accumulated separately, a separate laboratory actual FTE ratio must be computed and applied to those costs, and the FTE ratio for the rest of the region must be calculated, net of the laboratory FTEs. Thus, using actual FTEs in the calculations, the adjusted regional ratio is presented in Figure 5-2.

Once this ratio is calculated, the adjusted regional ratio is applied to costs that support activities other than the laboratory. The total FTE ratio for the region will still be used in distributing those cost pools that benefit both laboratory and non-laboratory activities.

(2) AUTHORIZED FTE RATIO. The authorized FTE ratio is calculated by dividing the total Superfund authorized FTEs, as identified in the October 1 approved operating plan, by the total authorized FTEs. Like the actual FTE ratio, this ratio is expressed as a percent. (See Figure 5-2.)

d. STEP 4: CALCULATE THE PORTION OF TOTAL ALLOCABLE SUPPORT COSTS CHARGEABLE TO SUPERFUND. The appropriate percentage(s) developed in Step 3 is applied to the appropriate cost categories by subobject classes. If more than one ratio is used, the allocations resulting from these calculations are added together to find the total amount to be allocated for each subobject class.

Except for the first month of the fiscal year, support costs for prior months will have already been allocated to Superfund when these calculations are performed. Therefore, it is necessary to compare the computed amount, WHICH WAS BASED ON CUMULATIVE DATA, against charges previously allocated to Superfund. The difference between the computed amount and previous allocations by subobject class represents the current month charges.

e. STEP 5: DISTRIBUTE COSTS FROM THE GENERAL SUPPORT ACCOUNT TO SUPERFUND. The Superfund share of the general support costs, as determined in Step 4, must now be distributed from the Salary and Expense (S&E) General Support Account to Superfund at the subobject class level. This distribution should be made preferably on a monthly basis, but no less often than quarterly; during the fourth quarter it must be performed monthly.

(1) The debit (charge part of this distribution) is recorded to Superfund support account 8TEUXXX700. To readily identify the costs allocated under these procedures, a special ODN such as SF ALLOCATE is used.

(2) The credit is recorded to a separate S&E account (8A4EXXX003 under program element A4EX5A, assuming it has not been used) so that it also may be easily identified. This step leaves intact the initial charges in the S&E general support account for monthly recomputation of cumulative distributions. The S&E account 8A4EXXX003 becomes a contra account for 8A4EXXA001 and others, if established.

The document control number (DCN) and the obligating document number (ODN) must not be linked to any previously used DCN or ODN in the support accounts, since this allocation does not relate to any single previous transaction. Instead, a unique DCN-SF0001 (assigned serially)--and ODN-SF ALLOCATE--are used to clearly identify these transactions. Once completed, the appropriations should accurately reflect all costs chargeable on a cumulative basis.

ALL SUPPORT COSTS

*1

NATIONWIDE HEAD- REGIONAL LABO- QUARTERS SUPPORT RATORY COSTS COSTS

A4CX5A A4DX5A A4EX5A A4FX5A *2 *2 *2 *2

*3 *3 *3 *3

TERY5A TEUY5A TLXY5A HAZARDOUS HAZARDOUS HAZARDOUS SUBSTANCE SUBSTANCE SUBSTANCE SUPPORT SERVICES SUPPORT SERVICES ORD: HEADQUARTERS REGIONS LAB SUPPORT

---*-*-*-*-* FIGURE 2550D-05-01 *-*-*-*-*

		Calculation of Actual
Calculation of Authorized	FTE Ratios:	FTE Ratio:
<hr/>		
Total Actual Superfund FTEs	Total Authorized Superfund FTEs	
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Total Actual FTEs		Total Authorized FTEs

NOTE: Total Actual FTEs = Superfund + LUST + S&E + S&E Reimbursable | NOTE: Total Authorized FTEs = Superfund + LUST + S&E + S&E Reimbursable

Adjusted Regional Ratio:

$$\frac{(\text{Total Regional Superfund FTEs}) - (\text{Laboratory Superfund FTEs})}{(\text{Total Regional FTEs}) - (\text{Total Laboratory FTEs})}$$

NOTE: Where Regional laboratory and office costs are accumulated separately, a separate laboratory actual FTE ratio must be computed and applied to those costs, and the FTE ratio for the rest of the region must be calculated, net of the laboratory FTEs.

--*_*_*_*_*_* FIGURE 2550D-05-02 *_*_*_*_*_*_

SAMPLE ALLOCATION OF SUPPORT COSTS

a. INITIAL ALLOCATION AND ASSUMPTIONS

- (1) Assumptions. The initial allocation is based on the following assumptions:
- o \$5,000 in Superfund-specific support costs, directly benefitting Superfund;
 - o \$6,000 in salary and expenses (S&E) programspecific support costs, directly benefitting S&E;
 - o \$30,000 in general support costs, benefitting all programs, including Superfund;
 - o all general support costs are allocable on the actual FTE ratio;
 - o FTE ratios are Superfund 25/100, or 25 percent, and S&E 75/100, or 75 percent. All percentage calculations should be carried out to two decimal points.

(2) **Allocations.** The initial allocation is as follows:

(Refer to Figure 5-4)

- o General support Costs allocable to Superfund equal \$30,000 X 25 percent, or \$7,500.
- o General support Costs allocable to all S&E support equal \$30,000 X 75 percent, or \$22,500.

(3) Pro Forma Accounting Entries for Support Costs. (Refer to Figure 5-5.)

b. SUBSEQUENT ALLOCATION AND ASSUMPTIONS

- (1) Assumptions. Subsequent allocations are based on the following assumptions:
- o \$4,000 in Superfund-specific support costs;
 - o \$3,000 in S&E Program-specific support costs;
 - o an additional \$40,000 in general support costs, benefitting all programs, including Superfund;
 - o all general support costs are still allocable on the actual FTE ratio;
 - o 150 total FTEs (50 Superfund, 100 S&E); and
 - o FTE ratios are Superfund 50/150, or 33.33 percent, and S&E 100/150 or 66.67 percent.
- (2) Allocations. The subsequent allocations are as follows: (Refer to Figure 5-4)
- o General support costs allocable to Superfund equal
 - \$70,000 (\$30,000 initial plus \$40,000 additional)
 - X 33.33 percent, or \$23,331, less \$7,500 (previous allocation), or \$15,831.
 - The \$15,831 charge will update the previous allocation and make charges cumulative to date.
 - o The cumulative general support Cost allocable to S&E is the balance, or \$46,669.

(3) Pro Forma Accounting Entries for Support Costs. (Refer to Figure 5-5.)

8. ALLOCATION OF PERSONNEL SUPPORT COSTS. Where there are FTEs and PC&B costs readily identifiable and directly assignable to a specific appropriation, those costs should be charged to the proper appropriation accounts. As indicated in Chapter 4, the primary method for charging these costs is through recording actual hours worked to the benefit of those appropriations, either by submission of the Agency time card or by a supplementary timesheet. The Agency time card is only used for charging actual hours to an employee's FAN. The agency timesheet is used for charging actual hours when a portion of these hours are used for an activity other than the employee's FAN. The Agency timesheet is also used for purposes of allocating FTEs and PC&B costs described in this Chapter.

With Office of the Comptroller (OC) approval, EPA offices with allowances under more than one appropriation may allocate staff

FTEs and PC&B costs among the benefitting appropriations.

Offices that received approval to allocate prior to the date of this guidance may continue to do so under that approval, as long as the allocation methodology does not change or the group of employees to which the methodology applies does not change.

a. Request for OC Approval. Any office wishing to allocate their FTEs and PC&B costs must submit their request to the Responsible Planning and Implementation Officer or to the Allowance Holder, if this responsibility has been delegated.

Once approved, the request should be submitted to the Director, Financial Management Division.

In order to obtain OC approval, the requesting office must:

- (1) Define the group ("pool") of office employees whose time will be allocated (e.g., Region personnel management section, Immediate Office of Division Director, etc.).
- (2) Explain briefly why direct charging of time to the benefitting appropriations is not practical or would be less accurate than allocation methods.
- (3) Identify the statistic proposed to allocate FTEs and PC&B costs among the source appropriations. For example, regional Financial Management Offices (FMO) use a ratio of regional Superfund FTEs to total FTEs for allocating costs. Because a regional FMO staff provides services to the region as a whole, the percentage of Superfund FTEs in that region is a reasonable and readily available basis for determining the percentage of the FMO's resources spent in support of the Superfund program. In other administrative offices, a percentage of "transactions" may be a more appropriate measure.
- (4) Identify the time period for which the ratio is being calculated. For FTE ratios, the ratios should be calculated for each pay period. The data used to calculate the ratios would be "net" of the FTEs being allocated. For "transaction ratios," the ratios will normally be calculated for each month. If allocation of costs in an office is particularly complex, e.g., multiple allocation bases, FMD will consider approving "provisional rates" subject to periodic adjustment.

(5) Explain briefly why this measure, of the various alternatives, is the best indicator of benefit to the respective programs served. If the time period differs from the "standard" periods just mentioned, explain why the alternative would be more appropriate.

Offices should review their allocation methodology annually to see if it should be changed; if so, new approval is required.

A concurrence block for the signature of the Director, Financial Management Division must be included at the end of the memorandum requesting approval to allocate.

b. Procedure for Allocating Costs. In order to properly record the allocated charges (also called layoffs) in the Agency's accounting system, the allocated FTEs must be entered through EPA's payroll labor distribution subsystem. The steps for calculating the proper amounts and providing this information to the subsystem are as follows:

(1) Determination of Allocation Percentage. When the approved allocation methodology uses data from the Financial Management System (FMS) to determine allocation percentages, the office allocating costs may obtain the necessary data: 1) from the Financial Management Office (FMO) if the data are routinely generated on standard reports, 2) by directly accessing FMS through SPUR or other report generators or, 3) with the assistance of the Financial Management Office, by development of other special reports.

(2) Documentation of Calculations. The office allocating costs must maintain in readily available files documentation on the procedure by which the data are collected and, for each pay period or month, as appropriate, copies of the reports used and calculations made to determine the allocation percentages.

(3) Use of "Lagged" Data. Ideally, offices allocating their FTEs and PC&B costs for any given pay period will use data for the same time period to calculate the percent of those costs that may be charged to the respective appropriations. For example, a Region's FTE ratio for pay period 14 would be used to calculate the proportion of that Region's Financial Management Office's FTEs and PC&B costs charged to Superfund in that pay period. The availability of the Payroll Accounting Redistribution System (PARS) for labor redistribution can facilitate the use of concurrent data.

However, use of concurrent data, while preferred, may not be practical for all Agency offices. "Lagged" data may be used instead. Specifically, an office allocating costs may use for any given pay period the percentage calculated for the immediately preceding time period. For example, if costs are being allocated for pay period 12, and the office is using FTE ratios, the percentage to use in allocating those costs would be the FTE ratios for pay period 11. Or, if costs are being allocated for the pay periods ending in April, and the office is using transaction ratios, the percentage to use for the April pay periods would be the transaction ratio for March.

Generally, use of "lagged" data will result in a reasonably close approximation of the results obtained if the same time period as the pay period being allocated were used. However, offices using the lagged data should compare during the early part of September the charges actually allocated against what would have been allocated if concurrent data were used. If the difference for the office is more than \$1000 in total, the office will process an adjusting entry through the Servicing Finance Office prior to the end of the fiscal year.

(4) Manual Recording of Allocated Time. The standard document from which allocated time is entered is the EPA Form 2560-28 (10-86), "Payroll Distribution Timesheet." Unless automated processes are used (see below), a timesheet must be completed for each employee whose time is allocated.

Normally, when actual hours are recorded, employees fill in hours worked each day to the benefit of the respective accounts. However, when employee time is allocated among accounts, the daily columns need not be completed. Instead, the allocated hours should simply be entered in the summary column(s). For example, as shown in Exhibit 2550D-5-2, where an employee worked

80 hours in a pay period, and where the allocation ratio was calculated to be ten percent, 72 hours would be entered in the summary column for the fixed account number and eight hours for the Superfund account. (The calculations will generally not result in whole numbers; the hours recorded on the timesheet should be rounded to the nearest 1/4 hour, (or rounded to the nearest 1/10 of an hour if the PARS system is used.)

No signature is required on timesheets for allocated time. Because the allocated hours on the timesheets are simply a statistical determination of hours chargeable to an employee's account number, and the timesheets in this use serve solely as a medium for entering that data in EPA's payroll system, no signatures are required on the timesheets themselves. However, these timesheets must be transmitted to the Servicing Finance Office by a memorandum signed by the respective office head attesting to the accuracy of the allocation. The transmittal memorandum must include control totals for the number of timesheets and total hours allocated to each appropriation.

The Payroll Distribution timesheets must be submitted to the Servicing Finance Office by the standard due date established by that office.

EXCEPTION: In some instances, direct charging may be mixed with allocation methods for any given individual's labor distribution. If work is performed solely benefitting Superfund and is clearly identified as such (e.g., assembly of Superfund site cost documentation by a regional FMO staffer), those direct hours are charged; any similarly identifiable hours worked that do not benefit Superfund (e.g., a special project in the FMO to review construction grant obligations) must be recorded against the appropriate Salaries and Expenses account number. The balance of that employee's time could be allocated between Superfund and S&E.

(5) Automated Recording of Allocated Time. A number of offices have developed computer programs to automatically perform the allocation calculations and either print out the data necessary for the labor distribution information to be keypunched into the payroll system, or to perform the transfer of data directly into that system. With the condition that any computer applications are first submitted to the Microcomputer Applications Clearinghouse (see the Comptroller's March 24, 1987, memorandum on this subject), these automated processes may be used. A printout of the data transferred must be maintained as part of the documentation cited above. The accuracy of the data on the printout should be attested to by the signature of the respective office head.

CERTIFICATION FOR USE OF AUTHORIZED FTE RATIO
TO ALLOCATE SUPPORT COSTS TO SUPERFUND

MEMORANDUM

SUBJECT: Certification for Use of Authorized FTE Ratio to Allocate Support Costs to Superfund

FROM: Allowance Holder or Designee

TO: _____, Chief
Fiscal Policies and Procedures Branch

I request approval to allocate the following support-cost category/categories between appropriations on the basis of our authorized FTE ratio:

[List Support Cost Category/Categories]

Justification for Use of the Authorized FTE Ratio. (A discussion about each cost category, describing the costs included in each category and the facts and rationale used in determining that the authorized FTE ratio is more appropriate for use than the actual FTE ratio.)

Calculation of the Authorized FTE Ratio

(a) Authorized Superfund FTEs _____

(b) Authorized Total FTEs (S&E,
Reimbursable with Superfund) _____

Authorized Superfund FTE
Ratio (a)/(b) _____

Certification

I certify that the cost categories listed above are obligated on the basis of authorized FTEs and that the level of service provided cannot be adjusted to reflect lower FTE use.

Signature/Title

Approval of Use of an Authorized FTE Ratio

Based on the information presented here and the allowance holder's or designee's certification, I approve the use of the authorized FTE ratio for allocation of the cost categories listed above between the S&E and Superfund appropriations.

Director, Financial Management Division