

Title I, Part A Comparability of Services State and Local Base Salary Data

Federal Fiscal Compliance and Reporting Division



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Common Issues: State and Local Base Salaries

Common issues when reporting state/local base salaries:

- Not excluding:
 - Salaries paid with federal funds
 - Salaries paid with supplemental state and local dollars (optional)
 - Salaries paid with supplemental state and local dollars consistently
 - Staff salary differentials for years of employment





Common Issues: State and Local Base Salaries (Additional Issues)

- Additional issues:
 - Not including all instructional staff
 - Not having auditable documentation to support the reported state and local base salaries





Success Tips: State and Local Base Salaries (Exclude Federal Funds)

Exclude Federal Funds:

Exclude all salaries, or portions of salaries, paid with federal funds.





Success Tips: State and Local Base Salaries (Supplemental Dollars)

Exclude base salaries paid with supplemental state and local dollars:

- Public Law 115-64, Section1118. Fiscal Requirements (d) Exclusion of Funds states that a school system "may exclude" supplemental state and local dollars
- Exclusion of such funds is not required; however, it creates a more accurate picture
- Base salaries must be excluded consistently across the school system





Success Tips: State and Local Base Salaries (Continued)

Exclude base salaries paid with supplemental state and local dollars:

- May exclude salaries paid with supplemental state and local funds for the following special programs:
 - Language instruction educational programs, such as bilingual education for emergent bilingual (EL) students
 - Excess state and local costs of providing services to children with disabilities, as determined by the school system
 - State or local supplemental programs in any school attendance area or school meeting the intent and purposes of Title I, Part A





Success Tips: State and Local Base Salaries (Supplemental Continued)

Exclude base salaries paid with supplemental state and local dollars consistently:

- Be consistent when excluding supplemental state and local dollars
- Exclude the same salaries paid with supplemental dollars from all campuses' total state and local expenditures





Success Tips: State and Local Base Salaries (Salary Differentials)

Exclude staff salary differentials for years of employment:

- Per ESSA Section 1118 (c)(2)(B), "staff salary differentials for years of employment shall not be included ..."
- Exclude staff salary differentials for years of employment
- There is no flexibility with this requirement.





Success Tips: State and Local Base Salaries (Instructional Staff)

Include all staff considered instructional staff:

- "Instructional staff" refers to various types of personnel
- "Instructional staff" includes staff that provide direct instructional services and/or services that support instruction
- When in doubt review job description





Success Tips: State and Local Base Salaries (Auditable Documentation)

Have auditable documentation to support the reported expenditures:

- Official budget records from a school system's local accounting system are considered auditable documentation
- Accounting system records, such as payroll journals, are considered official records and are auditable documents





Success Tips: State and Local Base Salaries (Methodology)

Suggested methodology:

- It is recommended to use official financial accounting system records
- Obtain official payroll records from accounting system
- Exclude salaries, or portions of salaries, paid with supplemental state and local dollars, and be consistent
- Exclude fixed costs (benefits) and merit increases from the salary amounts
- Itemize, document, and report





Questions

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