

# **ESSA Fiscal Requirements: Title I, Part A – Comparability of Services State and Local Base Salary Data**

---

REPORTING AND DOCUMENTING

THE DATA FOR:

2017-2018

Texas Education Agency

Federal Fiscal Compliance  
and Reporting Division



FEDERAL FISCAL  
COMPLIANCE & REPORTING  
DIVISION



# Comparability of Services Requirement

---

- Common issues occurring among LEAs
- Issues identified are not occurring within HOW the LEAs are conducting the comparability testing
- Issues are occurring within the DATA the LEAs are using when conducting the comparability testing





# Common Issue Across All Data

---

## THE SOURCE OF DATA

- LEAs should use **current-year** data
- Example, for school year 2017-2018, LEAs should report the 2017-2018 enrollments, state and local budgeted amounts, FTEs, etc.



# State and Local Base Salary Data

---



# 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:
  - 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 all salaries, or portions of salaries, paid with federal funds.





# Success Tips: State and Local Base Salaries

---

EXCLUDE BASE SALARIES PAID WITH SUPPLEMENTAL STATE AND LOCAL DOLLARS

- Public Law 115-64, Section 1118. Fiscal Requirements (d) EXCLUSION OF FUNDS states that an LEA “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 LEA







# Success Tips: State and Local Base Salaries

---

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 children with limited English proficiency
  - English as a second language (ESL) services
  - Excess state and local costs of providing services to children with disabilities, as determined by the LEA
  - 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

---

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

---

## 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

---

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

---

HAVE AUDITABLE DOCUMENTATION TO SUPPORT THE REPORTED EXPENDITURES

- Official budget records 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

---

## SUGGESTED METHODOLOGY

- It is recommended that the LEA 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

---

Federal Fiscal Compliance and Reporting Division

[compliance@tea.texas.gov](mailto:compliance@tea.texas.gov)

(512) 463-9127



FEDERAL FISCAL  
COMPLIANCE & REPORTING  
DIVISION

# Copyright © Notice

---

The materials are copyrighted © and trademarked ™ as the property of the Texas Education Agency (TEA) and may not be reproduced without the express written permission of TEA, except under the following conditions:

1. Texas public school districts, charter schools, and Education Service Centers may reproduce and use copies of the Materials and Related Materials for the districts' and schools' educational use without obtaining permission from TEA.
2. Residents of the state of Texas may reproduce and use copies of the Materials and Related Materials for individual personal use only without obtaining written permission of TEA.
3. Any portion reproduced must be reproduced in its entirety and remain unedited, unaltered and unchanged in any way.
4. No monetary charge can be made for the reproduced materials or any document containing them; however, a reasonable charge to cover only the cost of reproduction and distribution may be charged.

Private entities or persons located in Texas that are not Texas public school districts, Texas Education Service Centers, or Texas charter schools or any entity, whether public or private, educational or non-educational, located outside the state of Texas MUST obtain written approval from TEA and will be required to enter into a license agreement that may involve the payment of a licensing fee or a royalty.

For information contact: Texas Education Agency, 1701 N. Congress Ave., Austin, TX 78701-1494; email: [copyrights@tea.state.tx.us](mailto:copyrights@tea.state.tx.us).

