

**Substitute System of  
Federal Time-and-Effort  
Reporting:  
Frequently Asked  
Questions**

## General

- 1.

Employees are required to complete the schedule, which both the employee and the supervisor with direct knowledge of the employee's schedule then sign. The schedule is kept on file at the local business office.

Per the Ed-Flex waiver, the employee is not required to complete or submit the certification.

However, in lieu of the semiannual certification, the employee is required to maintain signed and dated job descriptions identifying the funding source and job duties attributed to the program.

**7. As a result of the single cost objective definition, are any changes required for job descriptions?**

As applicable, a sentence should be added to the employee's job description stating that they are supported by a single cost objective, even though funding is split among multiple sources.

**Employee Schedule and Certification 8**

npheh



## Substitute System FAQ

If the employee's regular schedule changes regularly, such as every month, the substitute system will not work for that employee. In that case, the employee must continue with the monthly personnel activity report. However, if changes to the employee's schedule occur less frequently, such as once every three or four months, the

## Single and Multiple Cost Objectives

**31. What difference does it make whether an employee is supported by a single or multiple cost objectives?**

The difference has to do with documentation requirements.

An employee supported by a single cost objective is only required to submit a semiannual certification.

An employee supported by multiple cost objectives must either submit a monthly PAR (under the traditional system) or a schedule and semiannual certification (under the substitute system).

**32. Is there an easy way to determine when an employee paid out of multiple awards is really working under a single cost objective?**

Cost objectives are defined according to the set of work activities allowable under the term and conditions of each funding source. If an employee is working under a single cost objective, all the activities on his or her schedule must be totally supported from each federal grant contributing to the salary compensation, even when the employee is actually paid out of multiple grants. The activity is the cost objective, not the funding source.

**33. Instead of every six months, can we collect time and effort documentation at the end of each semester?**

The requirement is for time and effort to be reported at least semiannually, or twice yearly. Documenting time and effort at the end of each semester (for instance, in December and May) would meet that requirement.

**34. We are a small one-campus school district with only one position per grade. Teachers are paid out of local and federal funds, and their job duties are predetermined and unchanging. Are we eligible to use the substitute system?**

The key to determining whether an employee is working on a single cost objective is whether the employee's salary and wages can be supported *in full* from the federal award alone if the employee's salary is also paid with non-federal funds.

In your example, the employee is paid with federal and local funds, but the job duties are the same. As long as those duties could be paid in full from the federal source, then the employee has a single cost objective, and only semiannual certification is required.

**35. We have a middle school special education teacher who also teaches two regular ed classes. The teacher is funded from state special ed and local funds. Is this teacher eligible for the substitute system?**

**If so, how does the teacher differentiate the percentage of the day taught, given that the TEA-developed schedule lists state and local together?**

The federal time-and-effort reporting requirement applies only to employees who are funded in part with federal funds. For example, if a teacher is funded 40% by federal funds and 60% by state and local funds, the federal requirement applies to the 40% federal portion.

- 36. A teacher paid by IDEA-B proportionate share funds serves special education students in both public and private schools. As long as the teacher is serving students with disabilities 100% of the time, would this be considered a single cost objective, making the teacher eligible to use the substitute system?**

No, the LEA must differentiate between public school services and private school services.

- 37. A speech therapist works with students age birth through age 2 and supervises two assistants. The therapist is paid with IDEA-B Preschool and local special education coop funds. His schedule is regular and consistent. Does he qualify for the substitute system?**

As long as the employee provides speech therapy services for 100% of his time, he is supported by a single cost objective. He may submit a semiannual certification and does not need to use the substitute system.

- 38. Under IDEA-B, no more than 15% of grant funds may be used on coordinated early intervention services (CEIS). Employees who perform intervention services can be only partially funded from IDEA-B. The remainder of their salaries is funded from the general fund. If these employees deal with the same group of students every day and have a set schedule, can the substitute system be used?**

As long as the employees provide intervention services for 100% of their time, they are supported by a single cost objective. They may submit a semiannual certification and do not need to use the substitute system.

- 39. Can a teacher who is split-funded between Adult Ed and TANF funds considered to be supported by a single cost objective?**

The employee's Adult Ed activities cannot be supported under TANF. Therefore, this employee is supported by multiple cost objectives.

As long as the employee works according to a set schedule and does not do multiple activities at the exact same time, the employee is eligible to use the substitute system.

- 40. The definition of multiple cost objectives includes a funding split between direct and indirect costs from the same program. Is it possible for an employee who is funded under the same program but from direct and indirect costs to claim funding under a single cost objective?**

An employee who is paid from direct costs for one piece of work and from indirect costs for another piece of work is supported by multiple cost objectives, regardless of whether the program is the same.

For example, an HR staff member may be paid from Title II, Part A for both Title II, Part A recruiting (indirect) and verification of highly qualified status (direct).

- 41. Could Title III and LEP be considered a single cost objective?**

A district cannot support Title III and state ESL or bilingual activities under a single cost objective without running into supplant issues.

- 42. An LEA is funding a middle school math teacher from Title II, Part A and from SCE. Is the teacher eligible for the substitute system?**

Yes, as long as the teacher has a predetermined schedule consisting of activities for both programs.

- 43. What if an employee works a regular, consistent schedule, but one of the employee's regular activities is not grant eligible (for instance, the employee coaches the cheerleading squad)?**

The employee is still eligible to use the substitute system. The non-grant time would be charged to other local funds, using the manual entry fields (lines F and G) on the program list section of the employee schedule.

- 44. The LEA has some employees who are paid 100% out of IDEA-B and who provide proportionate share services. These employees traditionally submitted monthly PARs. Are they eligible for the substitute system?**



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