

North Dakota Department of Public Instruction

TITLE I FAST FACT SERIES

Issue: Documenting Time if Paid with Title I Funds

Why is time and effort documentation required?

The federal law requires all employees, including teachers, paraprofessionals, and other staff, that are paid with federal funds to document the time and effort they spend within that program. The portion of the federally paid salary should be reflective of the time and effort the individual has put forth for that federal program. For instance, if a Title I teacher spends 100% of his/her time working with Title I students and on Title I responsibilities, then 100% of his/her salary is to be paid with Title I funds. On the other hand, if an individual is working as a principal 50% of the time and 50% as the coordinator for the Title I program, only 50% of his/her salary is paid from Title I. The remaining 50% would be paid from district funding. The purpose of documenting time and effort is to ensure that a district does not use federal funds to compensate an employee for time spent on any other program.

When is time and effort documentation required?

All individuals being paid with federal funds must document their time and effort, no matter the percentage of time they are paid or if they are working in a Title I targeted assistance or schoolwide program. An employee dedicating 5% of his/her time to a federal program must document time and effort just as an individual employed 100% to a federal program would have to document time and effort. The difference is the type of documentation that each employee is responsible to complete.

What type of documentation is required?

- *Permanent Schedule* – A permanent schedule is most often used for teachers or individuals who are being paid with federal funds and hold a fixed schedule every day of the week. For instance, a Title I teacher’s schedule could document that he/she is being paid 100% with federal funds and 100% of his/her day is dedicated to Title I programming. A teacher who was 50% Title I and 50% reading coach could also use this method if his/her schedule were consistent, day after day. Permanent schedules should be on file and updated throughout the school year.
- *Semi-Annual Certification* – Districts who have fully-funded federal personnel or those that are partially funded with federal funds must have individuals submit an assurance every six months (at a minimum) documenting the amount of time they worked for each particular federal program. This certification should also include documentation of time spent on the federal program (such as a copy of daily planner, schedules, time sheets, daily logs). A sample assurance could state, “From January 1, 2011 to June 30, 2011, Jane Doe spent 100% of her time on Title I Part A instructional activities as evidenced by the enclosed schedule.” – Signed by employee and their supervisor.
- *Daily Log* – Individuals who work less than 100% for a particular federal program and whose schedule changes from day to day have the option of logging their time spent in the federal program each day. For instance, a principal who is paid 75% from the district for principal duties and 25% from Title I to coordinate the district’s Title I program could keep a daily log of the time spent on principal duties versus Title I coordinator duties. An individual in this situation does not hold a fixed schedule as principal duties are irregular and cannot be scheduled. Daily logs must be signed by the employee and their supervisor.
- *Monthly Certification* – Individuals who are funded from multiple funding sources can document their time and effort through monthly documentation. For this method, an assurance including time documentation would be submitted monthly, or as indicated by the employees pay period (i.e., paid every two weeks, two week certification). A sample monthly assurance could state, “For the month of October 2011, Jane Doe spent 50% of her time on Title I Part A instructional activities and 50% on general fund instructional activities as evidenced by the enclosed schedule.” – Signed by employee and their supervisor.

Which type of documentation pertains to my position?

The type of documentation you will be responsible for depends on the type of position held. Use the chart below to determine the best form of documentation for your position.

Position	Permanent Schedule	Periodic Certification	Daily Log	Monthly/Quarterly Certification
Title I Teacher (fixed schedule)	✓	✓		
Title I Teacher (variable schedule)			✓	✓
Data Coordinator			✓	✓
School Improvement/Schoolwide Coordinator			✓	✓
Reading/Math Coach (fixed schedule)	✓	✓		
Reading/Math Coach (variable schedule)			✓	✓
Class-size Reduction Teacher (fixed schedule)	✓	✓		
Preschool Teacher (fixed schedule)	✓	✓		
Title I Coordinator			✓	✓
Aides/Paraprofessionals (fixed schedule)	✓	✓		
Aides/Paraprofessionals (variable schedule)			✓	✓

Who is responsible?

The district is ultimately responsible for ensuring that staff maintain their time and effort documentation; however, documentation records should be signed by the employee and supervisor evidencing first-hand knowledge of the work performed under the federal program.

What are the repercussions if employees do not document their time and effort?

When districts are monitored, federally paid employees will be asked to submit documentation of their time and effort. If no documentation or inadequate information is provided, the district will be cited as being out of compliance. During recent U.S. Department of Education (USDE) monitoring of states and school districts, more extreme action has been taken. The USDE and state auditors have required districts across the nation to reimburse the federal government for paying salaries without adequate time and effort justification.

Does this just pertain to Title I programming?

This requirement pertains to all federal programs, not just Title I. Districts that receive other federal funds, such as Migrant, Homeless, Neglected and Delinquent, Title II A, Title III, etc., must also ensure their employees are documenting their time and effort.

What if there are differences?

If there are differences in the amount of time that an individual is reporting and what is actually being paid, adjustments must be made in the payroll to accurately reflect the time and effort spent on a particular federal program.

If you have questions regarding this issue, please contact:

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