Administrative Questions

Q: What is the effective date of all approved new administrative rules that were provided to us by CTPF?
A: The mandatory Lookback rule is effective July 1, 2018. Application of the Lookback rule was discretionary prior to that date. Update to ineligibility of third-party employee, third-party contractor, of an employment agency, or of any other vendor ("Third Party Vendor") in CTPF membership is effective as of July 1, 2022. All other administrative rules (e.g., the Salary rule) simply provide guidance as to already-existing law and the obligations that have existed since that law has been in place.

Member Eligibility

Q: If a current Member has a lapsed License but was licensed at the end of the previous fiscal year, the Employer is mandated to continue to report pension contributions for the subsequent Fiscal Year, so long as it is reasonable for the Employer to believe that the Member will be licensed by the last day of the current Fiscal Year. What happens if the license is still in lapsed status after the subsequent Fiscal Year? **A:** The Lookback rule no longer applies. You will need to stop reporting pension contributions to CTPF if the license is in lapsed status after the subsequent Fiscal Year.

Q: As a Charter Employer, are we required to submit pension contributions for an employee of a third-party contractor, of an employment agency, or of any other vendor ("Third Party Vendor")?
A: There is an update to the eligibility of the Third-Party employees. As of 7/1/2022, such employees are no longer eligible to participate in the CTPF Fund. Those with previously reported contributions will be processed by CTPF and a refund of the contributions will be issued directly to the employees by CTPF.

Q: If, prior to the end of the current fiscal year, an employee informs their employer that they do not intend to renew their ISBE license for the upcoming fiscal year, is that employee eligible to contribute to CTPF for that upcoming fiscal year?
A: No - The Lookback Rule applies to a "reasonable belief" that the employee will be, or is in the process of, renewing their license for the upcoming year. In this case, there is no reasonable belief as the employee clearly communicated BEFORE the end of the school year that they will not renew for upcoming year.

Q: If we have a position that is not reflected in the Eligibility rule, should we contact CTPF?
A: Yes. This list is subject to revision.

Q: Does CTPF have any grandfathered eligibility rules?
A: No CTPF does not have any grandfathered eligibility rules.

Q: Can anyone opt out of participating in the CTPF plan?
A: If the employee has a valid certificate/license and is working in a covered position, the employer **must** report pension contribution to CTPF including Contract Schools, there is no opt out option.

Q: If employer has a position that is not reflected in the Eligibility rule or is not listed on the employee profile page under position type, should we contact CTPF?
A: Yes. This list is subject to revision but if the employee is working in a non-covered position, even with valid ISBE license, this employee will most likely not be eligible to participate in CTPF.

ISBE Licensing

Q: Will CTPF provide user-friendly communication for the Charter Employers to provide to Employees as to why pension contributions are being deducted from Employee salaries when their license/certificate is not in active status?
A: CTPF has provided the Lookback rule to all Employers. The Employer has the obligation to explain to the Employee the Lookback rule, which provides that (i) an individual may be treated as a qualified participant in a pension fund throughout a calendar year if he or she was a qualified participant in the system at the end of the plan year of the system ending in the preceding calendar year or, (ii) for the first year of participation, if it is reasonable to believe that the individual will be a qualified participant (i.e. licensed) on the last day of the plan year.

Q: If a current Employee has a valid ISBE license and is working in a covered position through 06/30/24 (the last day of the Fiscal Year), then the employer realizes the license is in lapsed or expired status on 09/15/24 and the Employee has indicated that they do not intend to renew the license, do we still need to report pension contributions to CTPF?
A: Yes, because based on the lookback rule, if the employe's license was valid until the end of the prior fiscal year, and as long as the employer was under reasonable belief that the employee will renew the ISBE license by the end of the current fiscal year, the employer should report this employee until the end of the current fiscal year, which in this example will be 6/30/2025.

Q: Does a Long-Term substitute need a PEL ISBE license to be eligible to participate in CTPF?
A: The substitute needs to have a valid active certificate/license along with working in a covered position to be eligible to

participate in CTPF plan.

Q: What happens if ISBE license Lapsed, it's past the look back rule and employee eventually renewed, should the employer report the employee up to the lookback rule date, then don't report until they have an active license again?
A: The employee should not be reported during gap years.

Return to Work

Q: Are the Return-to-Work rules only applicable to Employees who are licensed and in an ISBE-covered position? **A:** Yes, the Return-to-Work rules are only applicable to Employees who are licensed and in an ISBE-covered position.

Q: What is an example of work that is not subject to the Return-to-Work rules?
A: Charter School A has hired a CTPF retiree who works as an unlicensed teacher in an ISBE covered position or still has an active ISBE license but is working in a non-covered position such as accountant.

Q: What is an example of work that is subject to the Return-to-Work rules?
A: Charter School A has a CTPF retiree that works as a licensed teacher in an ISBE-covered position, such a regular classroom teacher.

Q: If an employee is coming back to a non-covered position, does employer/employee need to keep track of hours? **A:** Neither employer nor employee need to keep track of hours/days if they return to a **non-covered** position.

Salary

Q: The Salary rule provides three different criteria for whether salary is pensionable:
(1) Is the salary related to the Member's core duties or qualifications for employment?
(2) Is the salary for compensated work performed by a Member during normal school hours? or
(3) Is the salary for compensated work that is required as a condition of employment by an Employer?
If only one out of the three criteria apply, are we required as an Employer to report the pensionable salary increment? **A:** Yes, if salary meets one or more of the criteria, you're required to submit the pensionable salary increment.

Q: The Salary rule indicates that summer school is generally considered to be non-pensionable. As an Employer, if we determine summer school is required as a condition of employment, should the summer school salary be reported as pensionable to CTPF?
A: As a general matter, compensation paid to a member for optional service and other compensation paid at the discretion of the Employer that is not in lieu of Salary are Non Pensionable Salary Increments. However, any Salary Increment, including those listed in the Salary rule, and in Appendix B to the Salary rule, if required as a condition of employment OR for work performed during normal school hours is a Pensionable Salary Increment.

Q: Employer has a substitute as optional duty for regular teachers, this is not part of condition of employment, but employer does pays this as a stipend, should they report this as a pensionable increment?
A: Yes, If the core duties are performed during normal school hours should be pensionable increment. Any Salary Increment, including those listed below or in Appendix B, if required as a condition of employment OR for work performed during normal school hours is a Pensionable Salary Increment.
Q: Pensionable Increments for afterschool clubs, should they be reported?
A: This is considered a after school programs, therefore Salary Increment, as listed in Appendix B, if required as a condition of employment OR for work performed during normal school hours is a Pensionable Salary Increment. If it is not required as a condition of employment, and performed outside of the normal school day, the compensation received for optional service is not pensionable.

Q: Optional Service, if that's performed during school day, should it be pensionable?
A: Any Salary Increment, including those listed below or in Appendix B, if required as a condition of employment OR for work performed during normal school hours is a Pensionable Salary Increment.

Sec. 4 Non-Pensionable Salary Increments
All compensation paid to a Member for optional service and other compensation paid at the discretion of the Employer that is not in lieu of Salary are Non-Pensionable Salary Increments.
NOTE: Any Salary Increment, including those listed below or in Appendix B, if required as a condition of employment OR for work performed during normal school hours is a Pensionable Salary Increment.

Q: Are PTO Payouts or Severance Pensionable?
A: PTO or Severance payouts are not pensionable.

"Lump Sum Payout" will include payment to Members on a basis that is not fixed, regular compensation. Examples of Lump Sum Payouts include, but are not limited to, unused Sick Leave or PTO, severance pay, retirement incentives, and any payments to Members issued at the sole discretion of the Employer and not in lieu of Salary. Lump sum payouts are not pensionable.

Wage Data

Q: CTPF requires all Employers to submit the Wage Codes and descriptions, what is the purpose of sending the Wage Codes and Descriptions? **A:** Wage Codes and descriptions will provide CTPF information on how Employers treat payments under each wage code as pensionable wages or non-pensionable wages. Please reference section 6 of the Salary Rule to understand Employers' obligation to submit Wage Codes to the fund.

Delinquent Payroll Submission

Q: When will CTPF start assessing statutory penalties for not submitting in a timely manner?
A: The statutory penalties will start 30 days after the predesignated pay day as defined by 40 ILCS 5/17-132 (b).

Q: Who should we contact directly via email and phone for any late invoice-related questions and what is the turn-around time for us to receive a response?
A: Please email Latefeeinquiries@ctpf.org. The turn-around time is usually within 48 hours.

General ERS Questions

Q: As a Pension Officer, do I need to invite users in my multi-network schools. How do I invite users to all of the schools under the same Charter Holder?
A: The Pension Officer will need to invite users to one school. Once a user accepts the invitation and creates a profile, then the Pension Officer can grant the same user access to multiple units. Please note, that you do not need to send a new invitation if a user already been granted access to one school in the same charter holder. Please reference the User Manual in the resource section that is posted in ERS website for the instructions on granting user access. Once the Pension Officer, adds at least one user to the system, that new user can add additional users to the system.

Q: What is the best way to reach out to CTPF with any Employer Reporting System related questions?
A: The Employer Reporting System has a Help Desk icon for you to submit your questions.
Q: How do we log into the ERS?
A: For the initial Pension Officer access to the system, a system generated email will be sent to the Pension Officer to set-up their username and password. Once the Pension Officer has successfully created their login information, the Pension Officer can invite users to have access to ERS. The users will then receive a system generated email invite to set-up their username and password in order to get access to the system. Please reference the User Manual in the resource section that is posted in ERS website additional information.