



Notice

TRS system changes and procedures for non-contributing substitute teachers and part-time teachers' aides/paraprofessionals

Previous notices on this topic were distributed August 20, 2024 and January 16, 2025.

As of Monday, February 3, 2025, the TRS Wage & Contribution Reporting System has been modified to accept hours and wages for substitute teachers and part-time teachers' aides/paraprofessionals who validly deferred membership on TRS Form 106. Follow instructions in this notice to report them as “non-contributing” in **January 2025 and later** monthly reports.

Remember, TRS employers must first confirm these employees are **not** already TRS members before providing TRS Form 106. Instructions for doing so are provided later in this notice.

Key features of this system enhancement:

- 1) TRS will **track hours** reported for substitute teachers or PT aides/paras who deferred membership.
 - a) *Errors will occur in the Wage & Contribution Reporting System if your monthly report includes “non-contributing” hours for an existing member of TRS.*
 - b) *This status cannot be used for employees who do limited “stipend work” (e.g., coaches).*
- 2) The TRS Wage & Contribution Reporting System now includes a **report** so that employers can see how many hours have been reported this fiscal year for non-contributing subs/paras.
- 3) If 210 or more total non-contributing hours have been reported and posted in a single fiscal year, **TRS will automatically update** the employee’s membership status from “non-contributing” to Active or Rehired, as appropriate.
- 4) TRS also will send **activation notices** (emails) to school district personnel so they will know when to begin withholding contributions for that employee.

Read this entire bulletin carefully to avoid errors in your monthly reporting.

PART 1 Procedure for determining TRS membership status

1. When your district hires a substitute teacher or part-time teacher's aide/paraprofessional:
 - 1a. Log into the TRS Wage & Contribution Reporting System and select the **Member Search/Edit** button from the menu.
 - 1b. Type in the substitute or part time aide/para's SSN and click **Find**:

The screenshot shows the TRS Employer Wage & Contribution Reporting System interface. At the top, there is a blue header with the text 'TRS Employer Wage & Contribution Reporting System'. Below this, there is a menu bar with 'Member Search/Edit' highlighted by a red box. Underneath, there is a section for 'SCHOOLS' with a dropdown menu. Below that, there is a search section with the text 'Find by ID or SSN or Lookup by Name'. In this section, there is an input field for 'SSN' and a 'Find' button, both highlighted with red boxes. To the right of the 'Find' button is a 'Lookup' button. At the bottom right of the search section, there is a link 'Add New Member to TRS' with a plus sign icon.

- If the individual is *not found*, they are *not* a TRS member. **Go to Step 2.**
- If they are found with a status of either “Terminated – Cashed Out” or “Terminated – Transferred”: They are *no longer* members. **Go to Step 2.**

*If the employee is found and displays **any other status**, you cannot report them as a “non-contributing” sub/para. Do NOT proceed to Step 2.*

→ **2. Provide the employee a copy of TRS Form 106, Membership Election – Substitute Teacher or Part-Time Teachers’ Aide/Paraprofessional** on their first day of work.

- If the sub or PT aide/para elects to participate in TRS right away, begin withholding contributions immediately and report them to TRS like any other TRS member.
- If the sub or PT aide/para elects to *defer membership* (i.e., they choose *not* to become a TRS member right away), **go to Step 3.**

TIP: Always retain the signed Form 106 in your office for confirmation.

→ **3. Follow your software vendor’s instructions to include hours and wages for substitute teachers or PT aides/paras who have validly elected to defer membership in TRS.**

- If you don’t use upload files to create monthly TRS reports (or if your vendor hasn’t yet modified the files to include non-contributing subs or PT aides/paras), you can **manually** add non-contributing subs or PT aides/paras to the TRS Wage & Contribution Reporting System. See Part 2 of this notice.

PART 2 Procedure for including “non-contributing” subs or PT aides/paras in TRS wage and contribution reports *(for January 2025 and later)*

You can **upload** non-contributing employees who have already been included in your payroll system’s upload file, OR you can **manually add** a non-contributing employee to TRS.

If you upload a payroll file:

You will not notice any differences in the upload process.

- If your upload file includes non-contributing employees, you will be able to see their hours and wages on the TRS Employer Report – Member List screen. They will be listed with a Work Status of **Non-contr sub/PT para**, and their hours will be shown as a separate row, labeled “EMD Hours” (short for “elective membership deferral”):

The screenshot displays the TRS Employer Wage & Contribution Reporting System interface. The main heading is "Employer Report - Member List" for "2/2025/2, [REDACTED] SCHOOL (Test)". The interface includes filters for Record Selection (All selected), Sort By (Name selected), and Search for Member (SSN and Last Name fields). The report shows a table with columns: SSN, Name, Tier, Work Status, FTE, Earnings, Employee Contrib, and Employer Contrib. A row for a non-contributing employee is highlighted, showing "Non-contr sub/PT para" work status, 0.00 FTE, 250.00 Earnings, and 14.00 EMD Hours. Below this, two rows for full-time employees are visible, showing 1.00 FTE, 7,672.25 Earnings, and 625.29 Employee Contrib, and 10,416.67 Earnings, and 848.96 Employee Contrib.

SSN	Name	Tier	Work Status	FTE	Earnings	Employee Contrib	Employer Contrib
[REDACTED]	[REDACTED]		Non-contr sub/PT para	.00	250.00	.00	
						EMD Hours	14.00
[REDACTED]	[REDACTED]	1	Full Time	1.00	7,672.25	625.29	
[REDACTED]	[REDACTED]	1	Full Time	1.00	10,416.67	848.96	

- **Note:** You must report hours – *not days* – for proper tracking. TRS cannot convert days to hours for you. TRS law considers 7 hours to be a full day, and it is the employer’s responsibility to report hours for service provided.

If you need to manually add a non-contributing employee to TRS:

1. In the TRS Wage & Contribution Reporting System, select **Member Search/Edit** from the menu.
2. Enter the employee’s SSN in the field and click the **Find** button to confirm the individual is not already a member of TRS. (Refer to the procedure in Part 1 of this notice.)
3. Click the “Add New Member to TRS” button. You will see the following screen:

TRS Employer Wage & Contribution Reporting System

Add Member to TRS

202511 PUBLIC SCHOOLS (Test)

If your employee is not a TRS member, use this screen to create a membership record. All fields with an asterisk * are required.

NOTE: If the employee already is a TRS member associated with a different employer, you must access your Wage & Contribution Report to add them to your Employer ID.

New Member (page 1 of 2)

*Member SSN	5-12
*Last Name	KING
*First Name	MA
Middle Name / Suffix	
*Gender	Male
*Birth Date	Oct 12 1992

* Required field

Continue

On Page 1 (pictured above), complete all required fields and click Continue.

On Page 2, click the Work Status drop-down list and select “Non-contr sub/PT para”:

New Member (page 2 of 2)

Member SSN	51-12
Member Name	KING, MA
Gender	Male
Birth Date	10/12/1992
*Date Hired	Oct 2024 Hire dates are effective the 1st day of the month.
*Work Status	<div style="border: 1px solid black; padding: 2px;"> <ul style="list-style-type: none"> Full Time Hourly Part Time IAA CREF Working Retiree Re-employed Working Retiree <li style="border: 1px solid red;">Non-contr sub/PT para </div>
*Street Address	
*City	
*State	
*Zip Code	
Home Phone	406

Complete all required (*) fields on the screen and click Save.

- Once the employee record has been created, you can select your monthly employer report (for January 2025 or later) and add that employee to your report.
- Then use the “Employer Report – Edit Member Detail” screen to enter **hours and wages** for the non-contributing employee.

Continued on next page

Validating and submitting an employer report with non-contributing subs or PT aides/paras:

1. Access the “Employer Report – Summary” screen for your monthly report.
2. When you are ready, click the **Run Report** button like you normally would.
 - As you know, this button tells the TRS system to check your monthly report for errors or inconsistencies in your data.
3. If errors are found, you must resolve them and repeat Step 2 to validate your corrections.
New error messages have been implemented as part of this enhancement:

Error: This Work Status is not allowed for an existing TRS member.

- ▶ This error indicates the employee is already a TRS member, as explained in Part 1 of this notice.
- ▶ **To resolve:** Access the “Employer Report – Edit Member Detail” screen, select the appropriate work status, and include employee contributions. Click Save. (Contact the TRS Accounting team if you need assistance.)

Error: Hours and Wages are required for this Work Status.

- ▶ This error indicates that hours and/or wages were not entered for the employee.
- ▶ **To resolve:** Access the “Employer Report – Edit Member Detail” screen, enter their actual hours and wages, and click Save.

Error: Only Hours and Wages are allowed for this Work Status.

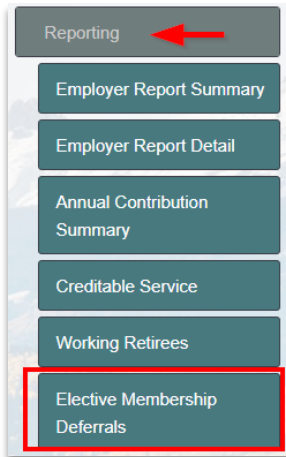
- ▶ This error indicates your upload file identified this employee as non-contributing, but contributions were included.
- ▶ **To resolve:** Access the “Employer Report – Edit Member Detail” screen, delete contributions, and click Save.

Error: Contributions are required as of [Date].

- ▶ This error indicates TRS membership has been activated for this employee, either because 210 or more hours were reported and posted for this employee in a fiscal year, *or* because the employee now works in a position that requires TRS participation.
 - **Note:** You should have received an auto-generated “activation notice” email from TRS stating the employee’s TRS membership deferral ended and that you need to update your payroll system to withhold contributions. (See sample email in Part 3 of this notice.)
- ▶ **To resolve:** Access the “Employer Report – Edit Member Detail” screen, update the work status as appropriate, and include contributions. (If you need assistance, call the TRS Accounting team.)

PART 3 What happens next?

As a courtesy, **TRS has created a report** listing your subs and PT aides/paras who elected to defer membership. You can view the report anytime while logged into the TRS Wage & Contribution Reporting System.



To access it, click the **Reporting** button in the menu, then select “Elective Membership Deferrals.” A sample report is pictured below.

The report shows only employees who were reported as non-contributing in your district. Any hours that other districts have reported for the same employees are shown as well.

Employees who have already been converted to “Active” or “Rehired” status will be listed at the top. Those who are still in “Elective Membership Deferral” status are listed below them. Hours reported thus far in the fiscal year are shown for all listed employees.

01/17/2025 11:17 AM

Montana Teachers' Retirement System

Page 1

Elective Membership Deferrals

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Reported as Non-Contributing Sub or PT Aide/Para during Fiscal Year 2025

This report shows total non-contributing hours reported by all TRS employers for the fiscal year.


When a non-contributing substitute teacher or part-time teachers' aide/paraprofessional meets or exceeds the 210-hour threshold, OR when an employer reports that individual to TRS as a member, the Non-Contributing status is automatically ended and the employee becomes a TRS member.

SSN	Last4	Name	TRS Member Status	TRS Status Effective	Posted		Total		Remaining	
					N-C	N-C	FY N-C	% of 210	FY N-C	N-C
				Hours	Hours	Hours		Hours		Hours
6446			Rehired	12-0	481.00	.00	481.00	230%		-271.00
4790		JTT B	Rehired	01-0	413.00	.00	413.00	197%		-203.00
8876		J	Rehired	12-0	364.00	.00	364.00	174%		-154.00
9487		L M	Rehired	11-0	343.00	.00	343.00	164%		-133.00
6637		RI L	Rehired	11-0	294.00	.00	294.00	140%		-84.00
9982		ITA	Active	10-0	210.00	.00	210.00	100%		.00
9984			Active	10-0	210.00	.00	210.00	100%		.00
8634		EY K	Elective Membership Deferral	09-0	203.00	.00	203.00	97%		7.00
4442			Elective Membership Deferral	10-0	.00	21.00	21.00	10%		189.00

How will employers know when to start withholding contributions?

Auto-generated emails will be sent to affected school districts when a non-contributing employee’s membership has been activated by TRS and the district must begin withholding contributions from the employee’s pay. A sample email is shown on the next page.

From: TRSIT@mt.gov <TRSIT@mt.gov>
Sent: Wednesday, January 29, 2025 12:12 PM
To: [REDACTED]
Subject: RE: Activation Notice - TRS Membership Deferral Ended

 **Montana Teachers' Retirement System**

RE: Activation Notice - TRS Membership Deferral Ended

The TRS membership deferral for RACHEL [REDACTED] ended as of 01-31-25. Please update your payroll system to include TRS contributions for any service RACHEL [REDACTED] provides in the months of February 2025 or later.

Tip: The TRS Wage & Contribution Reporting System allows you to view all hours reported and posted to date for your non-contributing substitute teachers and part-time teachers' aides/paraprofessionals. Choose the "Reporting" menu option, then run the "Elective Membership Deferrals" report.

If you have any questions, please contact the TRS Accounting team at 444-3323 or 444-2540.

Montana Teachers Retirement System

Montana Teachers' Retirement System
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Ph. (406) 444-3134 (866) 600-4045 trs.mt.gov

Note:

If the employee's membership was automatically activated because at least 210 hours had been reported during the fiscal year, the email will instruct the district to begin withholding contributions effective the month *following* the month in which the threshold was reached.

These emails will be sent automatically to the payroll contact on file with TRS, as well as to registered users of the TRS Wage & Contribution Reporting System.

Do not reply to the automated emails. Contact numbers are provided at the bottom in case you need help from a member of the TRS Accounting team.

Other Resources

The **Online Manual** within the Wage & Contribution Reporting System will be updated as soon as possible to reflect these changes.

Updates have been made to two existing Fact Sheets, available on the TRS website (*trs.mt.gov*):

- **Substitute Teaching and Elective Membership Deferrals**

This fact sheet has been updated with additional information.

- **Calculating and Reporting Extra Duty Service Credit**

This fact sheet will help employers understand when TRS membership is required for a community member who performs stipend work, such as coaching.

If you have questions or concerns about these system enhancements or about the content of this notice, please contact Nolan Brilz, TRS Accounting/Fiscal Manager. He can be reached by telephone (406-444-3679) or by email: NBrilz@mt.gov