

# Supplement, Not Supplant Methodology

FY19 Title I, Part A

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## VISION

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To create a world-class educational system that gives students the knowledge and skills to be successful in college and the workforce, and to flourish as parents and citizens

## MISSION

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To provide leadership through the development of policy and accountability systems so that all students are prepared to compete in the global community

1. All Students Proficient and Showing Growth in All Assessed Areas
2. Every Student Graduates from High School and is Ready for College and Career
3. Every Child Has Access to a High-Quality Early Childhood Program
4. Every School Has Effective Teachers and Leaders
5. Every Community Effectively Uses a World-Class Data System to Improve Student Outcomes
6. Every School and District is Rated “C” or Higher

# Agenda

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- Overview of New Supplement, not Supplant
- Review and Discussion of Option 1
- Review and Discussion of Option 2
- Review and Discussion of Option 3
- Review and Discussion of Option 4

# Agenda

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- Supplement, not Supplant and Other Programs
- Allowability and Fiscal Compliance
- Closing Remarks

# Supplement, not Supplant

## Old Versus New

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# IN GENERAL

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- ESEA section 1118(b)(1)
- The statute requires an SEA or LEA to use Title I funds only to supplement the funds that would, in the absence of those Title I funds, be made available from State and local sources for the education of students participating in Title I programs, and not to supplant such funds.

# PRESUMPTIONS OF SUPPLANTING

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What would have happened in the absence of federal funds?

# PRESUMPTIONS OF SUPPLANTING

- Three Presumptions of Supplanting
  1. Required to be made available under other federal, state, or local law
  2. Provided with non-federal funds in prior year
  3. Provided services to Title I students and the same services were provided to non-Title I students using non-federal funds

# SPECIAL RULE

- ESEA section 1118(b)(1)-(2)

**Standard:** Federal funds must be used to supplement and in no case supplant state, and local resources.

**Test:** To demonstrate compliance, the LEA shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that the school receives all the State and local funds it would otherwise receive if it were not receiving Title I funds.

# SPECIAL RULE

- ESEA section 1118(b)(2)-(4)
- According to the statute, no LEA shall be required to—
  - Identify that an individual cost or service supported with Title I funds is supplemental; or
  - Provide Title I services through a particular instructional method or in a particular instructional setting in order to demonstrate compliance.

# SPECIAL RULE

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The special rule applies to both schoolwide programs and targeted assisted programs.

# SPECIAL RULE

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- What does this mean?
- **The presumptions of supplanting do not apply to Title I, Part A at the SCHOOL LEVEL!**

# DEMONSTRATION OF COMPLIANCE

- ESEA section 1118(b)(2)-(4)
- Under the statute, to demonstrate compliance with the supplement, not supplant requirement, an LEA must **demonstrate** that the **methodology** used to **allocate State and local funds** to its schools ensures that **each Title I school receives all of the State and local funds it would otherwise receive** if it were not receiving Title I funds.

# DEMONSTRATION OF COMPLIANCE

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Supplement, not Supplant (SNS) is now a methodology test.

# METHODOLOGIES

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- The methodology must—
  - Allocate **State and local funds** to the schools in the LEA; and
  - Provide **each Title I school** with the State and local funds it would receive were it not a Title I school—i.e., be **neutral** regarding a school's Title I status.

# METHODOLOGIES

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- The LEA must have a written methodology to distribute state/local funds to its schools so that funds are distributed without regard to the school's Title I status.
- An LEA must be able to demonstrate compliance—i.e., that it has implemented its methodology.
- The methodology must be in place prior to the start of the **18-19 school year.**

# DISTRICTWIDE EXPENDITURES

- USDE requires the original presumptions of supplanting
  1. Required to be made available under other federal, state, or local law
  2. Provided with non-federal funds in prior year
  3. Provided services to Title I students and the same services were provided to non-Title I students using non-federal funds

# SNS METHODOLOGIES

# SNS METHODOLOGY EXCLUSION

- Exclusion of Funds
  - LEAs may exclude supplemental state or local funds used for a program that meets the intents and purposes of Title I, Part A
- Excluded from the SNS Methodology Test:
  - Single School LEAs
  - LEAs with only 1 school per grade span

# SNS OPTIONS

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- ***Option #1: Distribution of non-federal resources based on grade span***
- ***Option #2: Distribution of non-federal resources based on weighted per pupil allocations***
- ***Option #3: Distribution of non-federal resources based on staffing and supplies***
- ***Option #4: LEA adopted methodology***

# GENERAL DETAILS

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The use of the suggested methodology should be made after determining a number of deductions from the General Fund to take into account logistical and administrative support costs.

# GENERAL DETAILS

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Local Educational Agencies (LEAs) should review the total revenue that is available from the General Fund - 1120 – District Maintenance Fund. The LEA should determine the budgeted amounts for the following functions:

# GENERAL DETAILS

Function	Description
2310 – 2330	Support Services – General Administration
2410 - 2490	Support Services – School Administration
2510 – 2590	Support Services – Business
2610 – 2690	Support Services – Operation & Maintenance
2710 – 2790	Support Services – Student Transportation Services
2810 – 2890	Support Services – Central
3000 and Up	Non Instructional Services, Sixteenth Section, Facilities Acquisition and Construction Services, Debt Service, Other Financing Uses, Direct Decreases in Fund Equity

# GENERAL DETAILS

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The total amounts budgeted for these functions above should be subtracted from the available revenue in Fund 1120 – District Maintenance to yield the amount available for distribution in the selected methodology.

# GENERAL DETAILS

- County School District has **\$20,000,000** in Fund 1120 for BY18-19. The following amounts have been determined as the amounts need for the particular function ranges:

FUNCTION	RESERVATION
2310 – 2330	\$500,000
2410 - 2490	1,000,000
2510 – 2590	500,000
2610 – 2690	3,000,000
2710 – 2790	11,000,000
2810 – 2890	0
Total	\$16,000,000

# GENERAL DETAILS

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The amount that will be remaining for distribution amount the schools will be **\$4,000,000** (**\$20,000,000** minus **\$16,000,000**).

# SNS METHODOLOGY

## OPTION #1

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# SNS OPTION #1

- ***Option #1: Distribution of non-federal resources based on grade span***
- The use of this methodology will allow the LEA to distribute a per pupil allocation amount based on Grade Spans. The LEA may determine a per pupil amount that it deems to be reasonable and feasible for each grade span to support instructional services at each school within the district and allocate funding accordingly.

# SNS OPTION #1

**PLEASE NOTE:** The district will identify the grade spans to be factored into the calculation based on the district's configuration. Assume the per pupil amount below:

Grade Span	Per Pupil Amount
K-12 Attendance Center	\$2,500
Grades K-5	\$4,000
Grades 6-8	\$2,000
Grades 9-12	\$5,000

# SNS OPTION #1

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Using Month 9 Enrollment data, the schools' allocations will be determined based on the per pupil amount identified above.

# SNS OPTION #1

Funding for each school would then be calculated by grade span, based on this per pupil amount:

School Name	Grade Span	Month 9 Enrollment	Per Pupil based on Grade Span	School Allocation of Non-Federal Funds
North Elementary	K-5	225	\$4,000	\$900,000
South Elementary	K-5	300	\$4,000	\$1,200,000
East Middle School	6-8	200	\$2,000	\$400,000
West High School	9-12	250	\$5,000	\$1,250,000
Directions Attendance Center	K-12	100	\$2,500	\$250,000
Total School Allocation				<b>\$4,000,000</b>

# SNS METHODOLOGY

## OPTION #2

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# SNS OPTION #2

- ***Option #2: Distribution of non-federal resources based on weighted per pupil allocations***
- The use of this methodology will allow the LEA to distribute a weighted per pupil allocation amount based on various at-risk factors. The LEA may determine a weighted per pupil amount that it deems to be reasonable and feasible for each at-risk factors to support instructional services at each school within the district.

# SNS OPTION #2

**PLEASE NOTE:** The district will identify the at-risk factors. Assume the total base per pupil and weighted per pupil amount below:

<b>Total Base per pupil Amount</b>	<b>\$3,300</b>
<b>At Risk Factor</b>	<b>PPA</b>
<b>Low Income</b>	<b>\$600</b>
<b>English Learners</b>	<b>\$300</b>
<b>Migrants</b>	<b>\$0</b>
<b>Students with Disability</b>	<b>\$400</b>
<b>Gifted Students</b>	<b>\$150</b>

# SNS OPTION #2

	North Elementary	South Elementary	East Middle	West High	Directions Attendance Center
Total Number of Students	225	300	200	250	100
per pupil Allocation	\$3,300	\$3,300	\$3,300	\$3,300	\$3,300
Total Base per pupil Funding	\$742,500	\$990,000	\$660,000	\$825,000	\$330,000

# SNS OPTION #2

PPA=\$600	North Elementary	South Elementary	East Middle	West High	Directions Attendance Center
Low Income Students	72	129	147	205	93
Total Additional Funding for Low Income Students	(72x600) \$43,200	(129x600) \$77,400	(147x600) \$88,200	(205x600) \$123,000	(93x600) \$55,800

# SNS OPTION #2

PPA=\$300	North Elementary	South Elementary	East Middle	West High	Directions Attendance Center
EL Students	15	20	5	0	8
Total allocation for EL Students	(15x300) \$4,500	(20x300) \$6,000	(5x300) \$1,500	\$0	(8x300) \$2,400

# SNS OPTION #2

PPA=\$400	North Elementary	South Elementary	East Middle	West High	Directions Attendance Center
Students with Disabilities	28	42	17	12	4
Total allocation for Students with Disabilities	(28x400) \$11,200	(42x400) \$16,800	(17x400) \$6,800	(12x400) \$4,800	(4x400) \$1,600

# SNS OPTION #2

PPA=\$150	North Elementary	South Elementary	East Middle	West High	Directions Attendance Center
Gifted Students	13	39	4	0	6
Total allocation for Gifted Students	(13x150) \$1,950	(39x150) \$5,850	(4x150) \$600	\$0	(6x150) \$900

# SNS OPTION #2

	North Elementary	South Elementary	East Middle	West High	Directions Attendance Center
Total Base per pupil	\$742,500	\$990,000	\$660,000	\$825,000	\$330,000
Total At-Risk	\$60,850	\$106,050	\$97,100	\$127,800	\$60,700
Grand Total	\$803,350	\$1,096,050	\$757,100	\$952,800	\$390,700

# SNS METHODOLOGY

## OPTION #3

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# SNS OPTION #3

- ***Option #3: Distribution of non-federal resources based on staffing and supplies***
- The use of this methodology will allow the LEA to distribute non-federal resources based on personnel and non-personnel resources. The LEA will determine a formula such that all schools receive an amount of non-federal funds at least equivalent to the personnel line item plus the non-personnel resources line item.

# SNS OPTION #3

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1. The average districtwide salary for each category of school personnel (e.g., teachers, principals, librarians, support staff) multiplied by the number of those personnel in each category assigned by the formula to the school; **and**
2. The average districtwide per pupil expenditure for non-personnel resources multiplied by the number of students in the school.

# SNS OPTION #3

- LEA should have **at least** the following personnel according to State accreditation standards:
  - a. (1) principal
  - b. (1) licensed librarian or media specialist
    - If the student enrollment is 499 or less, a half-time licensed librarian or media specialist
    - If the student enrollment is 500 or more, a full-time licensed librarian or media specialist

# SNS OPTION #3

- c. Student support personnel (e.g. counselor, social worker, behavior specialist, psychologist, etc.)
- d. Teachers (required teacher-student ratios)
  - Elementary: core teachers (English, math, science, and social studies)
  - Middle School: core teachers (English, math, science, and social studies) and physical education
  - High School: core teachers (English, math, science, and social studies), physical/health education, art, technology, and foreign language

# SNS OPTION #3

e. Instructional Supplies/Instructional Technology (e.g. textbooks, computers, software, etc.)

# SNS OPTION #3

- Teacher/student ratio according to State accreditation standards:
  - Kindergarten – 1:22
  - 1<sup>st</sup> – 4<sup>th</sup> Grade – 1:27
  - 5<sup>th</sup> – 8<sup>th</sup> Grade (self-contained) – 1:30
  - 5<sup>th</sup> – 12<sup>th</sup> Grade (departmentalized) – 1:33

# SNS OPTION #3

- Assume that County School District has:
  - 1 principal/school average salary = \$80,000
  - 1 librarian/school average salary = \$65,000
  - 1 student support/school average salary = \$45,000
  - 1 teacher average salary = \$53,000
  - \$328.37/student for instructional supplies and technology

# SNS OPTION #3

<b>North Elementary (K-5)</b>	<b>Month 9 Enrollment: 225</b>	
<b>Category</b>	<b>Calculation</b>	<b>Total</b>
<b>Principal</b>	1 x \$80,000	\$80,000
<b>Librarian</b>	1 x \$65,000	\$65,000
<b>Student Support</b>	.5 x \$45,000	\$22,500
<b>Teacher (1:22)</b>	11 x \$53,000	\$583,000
<b>Supplies/Technology</b>	225 X \$328.37	\$73,884
<b>North Elementary Total</b>		<b>\$824,383</b>

# SNS OPTION #3

<b>South Elementary (K-5)</b>	<b>Month 9 Enrollment: 300</b>	
<b>Category</b>	<b>Calculation</b>	<b>Total</b>
<b>Principal</b>	1 x \$80,000	\$80,000
<b>Librarian</b>	1 x \$65,000	\$65,000
<b>Student Support</b>	.5 x \$45,000	\$22,500
<b>Teacher (1:22)</b>	14 x \$53,000	\$742,000
<b>Supplies/Technology</b>	300 X \$328.37	\$98,511
<b>South Elementary Total</b>		<b>\$1,008,011</b>

# SNS OPTION #3

East Middle School (6-8)	Month 9 Enrollment: 200	
Category	Calculation	Total
Principal	1 x \$80,000	\$80,000
Librarian	.5 x \$65,000	\$32,500
Student Support	.5 x \$45,000	\$22,500
*Teacher (1:30)	8 x \$53,000	\$424,000
Supplies/Technology	200 X \$328.37	\$65,674
East Middle School Total		\$624,674

\*Core teacher (7), physical education

# SNS OPTION #3

West High School	Month 9 Enrollment: 250	
Category	Calculation	Total
Principal	1 x \$80,000	\$80,000
Librarian	.5 x \$65,000	\$32,500
Student Support	1 x \$45,000	\$45,000
*Teacher (1:30)	12 x \$53,000	\$636,000
Supplies/Technology	250 x \$328.37	\$82,093
West High School Total		\$875,593

\*Core teachers (8), physical/health education, art, technology, foreign language

# SNS OPTION #3

Directions Attendance Center	Month 9 Enrollment: 100	
Category	Calculation	Total
Principal	1 x \$80,000	\$80,000
Librarian	.5 x \$65,000	\$32,500
Student Support	1 x \$45,000	\$45,000
*Teacher (1:22)	9 x \$53,000	\$477,000
Supplies/Technology	100 x \$328.37	\$32,837
Directions Attendance Center Total		\$667,337

\*Core teachers (5), physical/health education, art, technology, foreign language

# SNS OPTION #3

	North Elementary	South Elementary	East Middle	West High	Directions Attendance Center
Total Allocation	\$824,383	\$1,008,011	\$624,674	\$875,593	\$667,337

# SNS METHODOLOGY

## OVERVIEW

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# SNS OPTIONS

- ***Option #1: Distribution of non-federal resources based on grade span***
- ***Option #2: Distribution of non-federal resources based on weighted per pupil allocations***
- ***Option #3: Distribution of non-federal resources based on staffing and supplies***

# SNS OPTION OVERVIEW

	North Elementary	South Elementary	East Middle	West High	Directions Attendance Center
Option #1 Total Allocation	\$900,000	\$1,200,000	\$400,000	\$1,250,000	\$250,000
Option #2 Total Allocation	\$803,350	\$1,096,050	\$757,100	\$952,800	\$390,700
OPTION #3 Total Allocation	\$824,383	\$1,008,012	\$624,674	\$875,593	\$667,338

# SNS METHODOLOGY

## OPTION #4

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# SNS OPTION #4

- ***Option #4: LEA adopted methodology***
- This form of equitable distribution does not necessarily fit within the parameters provided in the other three examples; however, the LEA assures that this methodology is neutral in regard to the Title I, Part A status of each school. The LEA has adopted this methodology and will provide a written description.

# SNS OPTION #4

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- Where to start?
  - How do LEAs distribute state and local funds to schools?
  - How do LEAs currently document how they distribute state and local funds/resources to schools?

# SNS OPTION #4

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- Are funds/resources distributed based on the following:
  - Positions in school
  - A weighted student funding formula or
  - A combination of approaches

# SNS OPTION #4

- Compliant distribution methodology could vary based on:
  - Grade-span
  - School size
  - Student needs
  - School model
  - Other factors, not based on Title I status

# SNS OPTION #4

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- LEA adopted methodology does not account for Title I funds the school will receive.
- The LEA does not base how to distribute state and local funds based on the Title I funds a school will receive.

# SNS DEMONSTRATION & EVALUATION

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# DEMONSTRATION PROCESS

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MDE is responsible for verifying that each LEA is in compliance with the demonstration requirements regarding supplement, not supplant under ESSA. To ensure all LEAs in Mississippi meet these requirements, each LEA will be required to submit the written methodology through its Title I application for 2018-2019 school year.

# EVALUATION

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- Possible method of evaluation:
  1. Examine how the LEA distributes state and local funds/resources to schools.
  2. Verify the methodology does not take away from state and local funds/resources from Title I schools because schools participate in Title I program.

# EVALUATION

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3. Verify the LEA followed its submitted methodology during on-site monitoring visit.

# SUPPLEMENT, NOT SUPPLANT OTHER PROGRAMS

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- Three presumptions of supplanting still applies to the following:
  - Title I, Part A (Districtwide expenses)
  - Title I, Part D
  - Title II, Part A
  - Title III, Part A
  - Title IV, Part A
  - Title V, Part B

# SNS – TITLE III, PART A

- Title III, Part A has its own provision prohibiting supplanting of other Federal, State, and local funds. (Section 3115(g)).
- In general, it is presumed that supplanting has occurred:
  1. LEA uses federal funds to provide services that the LEA was required to make available under other laws;or

# SNS – TITLE III, PART A

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- 2. LEA uses federal funds to provide services that the LEA provided with other funds in the prior year.
- Title III funds cannot be used to fulfill an LEA's obligation under Title VI of the Civil Rights Act of 1964 and the Equal Educational Opportunities Act (EEOA).

# ALLOWABILITY & FISCAL COMPLIANCE

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# ALLOWABILITY

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- Title I costs must still be allowable under the Title I program.
  1. Costs still must only benefit eligible students.
  2. Costs must be permissible under Title I and ESSA generally.
  3. Costs must still be necessary and reasonable.

# FISCAL COMPLIANCE

- Three methods in ESSA to ensure Title I funds are used to support students at-risk of failing:
  - Maintenance of Effort (MOE)
  - Comparability
  - Supplement, not Supplant

# FISCAL COMPLIANCE

## ESSA Maintenance of Effort

- Demonstrates that the district has maintained its fiscal effort by at least 90% over a two-year time period. MOE is based on actual expenditures for the entire district
- Required for all LEAs receiving funds under ESSA

# FISCAL COMPLIANCE

## Title I, Part A Comparability

- Requires LEAs to demonstrate that the amount of state and local funds Title I schools receive are comparable to non-Title I schools or other Title I schools within the same grade span
- Required for all LEAs receiving Title I, Part A and serving more than one school within the same grade span (many LEAs are exempt from this requirement)

# FISCAL COMPLIANCE

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## Supplement, not Supplant

- Requires a methodology to demonstrate that Title I schools receive all of the state and local funds they would otherwise receive if they were not Title I schools
- Required for all LEAs receiving Title I, Part A

# QUESTIONS?

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