

Supplement, Not Supplant Methodology

FY19 Title I, Part A

2018 MASS Summer Conference



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VISION

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

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

- 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

- Supplement, not Supplant and Other Programs
- Allowability and Fiscal Compliance
- OFP Updates
- Questions

Supplement, not Supplant

Old Versus New

IN GENERAL

- 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

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

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

SPECIAL RULE

- 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

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

METHODOLOGIES

- 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

- 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

EQUAL VS. EQUITABLE



EQUAL



EQUITABLE

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

- ***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

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

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

SNS METHODOLOGY

OPTION #1

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

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				\$4,000,000

SNS METHODOLOGY

OPTION #2

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:

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

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

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

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
 - 1st – 4th Grade – 1:27
 - 5th – 8th Grade (self-contained) – 1:30
 - 5th – 12th 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

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

SNS OPTION #3

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

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

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

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

- 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

- 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

DEMONSTRATION PROCESS

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.

SNS Methodology Form

SNS Methodology Form

In consideration of participating in a Title I, Part A program(s) for which federal funds are made available and of receiving federal funds to carry out any such program(s), the _____ (LEA NAME) provides the following to the Mississippi Department of Education:

(The LEAs only complete section a or b, as applicable.)

- ☐ a. For LEAs with a single school or only one school per grade span:
- (1) An assurance that it is in compliance with the supplement, not supplant provisions of section 1118(b) of, and referenced throughout, the Every Student Succeeds Act.
- No further action is required beyond the assurance.***

SNS Methodology Form

- ☐ b. For LEAs with more than one school per grade span:
- (1) An assurance that it is in compliance with the supplement, not supplant provisions within section 1118(b) of, and referenced throughout, the Every Student Succeeds Act;
 - (2) An indication that it has adopted and implemented the following methodology to allocate state and local (non-federal) funds to all schools in the LEA, regardless of Title I status (*select only one*):
 - ☐ Distribution of non-federal (state and local) resources based on grade span
 - ☐ Distribution of non-federal (state and local) resources based on weighted per pupil allocations
 - ☐ Distribution of non-federal (state and local) resources based on staffing and supplies
 - ☐ LEA adopted methodology

SNS Methodology Form

(3) A narrative description of the methodology indicated above in (2).

NOTE

The LEA must provide the narrative description indicated above in the text box below or attach an addendum hereto.



The LEA must provide the ne

SNS Methodology Form

- Page 6 – Required Signatures
 - Federal Programs Director
 - Business Manager
 - Superintendent
- SNS Methodology Form due by **July 31, 2018**

EVALUATION

- 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

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

SUPPLEMENT, NOT SUPPLANT OTHER PROGRAMS

- 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

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

ALLOWABILITY

- 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

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

OFP Updates

Micro Purchase Changes

- OMB recently released notice of exception to the Uniform Grant Guidance to the 2 CFR 200.318(a) Micro Purchases.

Procurement Update

- Commodities purchases above \$5,000 to \$50,000 will require two quotes. \$50,000 and above must use the Reverse Auctions.
- Services above \$10,000 to \$250,000 will require two quotes.

July Deadlines

- July 20, 2018 – Title III Notice of Intent Survey
- July 25, 2018 – McKinney-Vento Homeless Competitive Grant
- July 31, 2018 – List of all non-public/private schools within the LEA's attendance area
- July 31, 2018 – MCAPS User Access Administration Form

July Deadlines

- July 31, 2018 – Final Equitable Services Plan and Written Affirmation
- July 31, 2018 - FY18 Allocation Revisions
- July 31, 2018 – SNS Methodology Form

Questions



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