ESEA Maintenance of Effort and Title I Comparability Requirements





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WASBO
FEDERAL FUNDING
CONFERENCE

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Wisconsin Department of Public Instruction

MOE: Definition & Purpose



• LEAs demonstrate MOE by either the combined fiscal effort per student OR the aggregate expenditures (non-federal funds) of the LEA for the preceding fiscal year was not less than 90% of combined fiscal effort or aggregate expenditure for the second preceding fiscal year

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MOE: Definition & Purpose



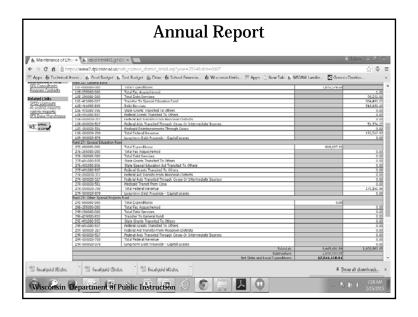
- A year-by-year analysis to ensure LEAs are supporting core education in Title I schools
- An LEA may receive its full allocation of Title I, Part A funds if the State determines the LEA has maintained its fiscal effort

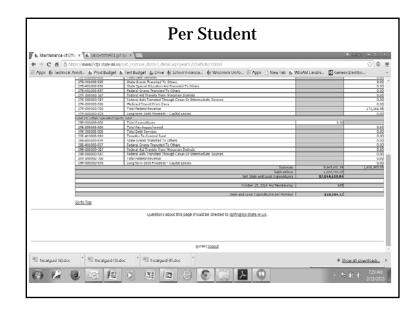
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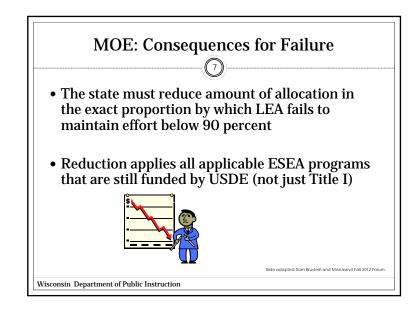
MOE: Calculations

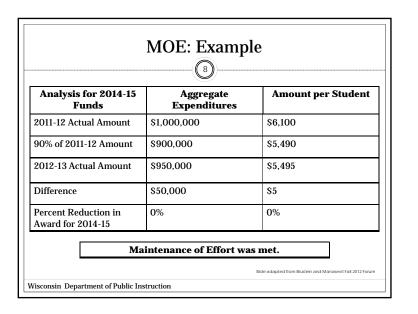


- The annual financial report (PI-1505) is used to determine MOE
- Amount from preceding year must not be less than 90 percent of the second preceding year
- Example: To receive funds available July 2015, DPI will compare 2013-14 school year expenditures to 2012-13 school year expenditures









MOE: Example

Analysis for 2014-15 Funds	Aggregate Expenditures	Amount per Student
2011-12 Actual Amount	\$1,000,000	\$6,100
90% of 2011-12 Amount	\$900,000	\$5,490
2012-13 Actual Amount	\$850,000	\$5,200
Difference (Shortfall)	<\$50,000>	<\$290>
Percent Shortfall/ Reduction in Award for 2014-15	-5.6%	-5.3%

The LEA's awards under ESEA for 2014-15 will be reduced by 5.3%.

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MOE: Waivers

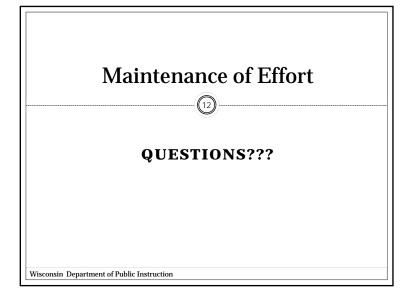


- USDE Secretary may waive if:
 - \circ There are exceptional or uncontrollable circumstances such as natural disaster OR
 - $\circ\,$ Precipitous decline in financial resources of the LEA
- Waivers in Wisconsin
 - o DPI will contact LEAs if MOE is not met
 - o LEAs will notify DPI if they want to request a waiver
 - o DPI will request waivers on behalf of all LEAs needing waivers
 - o DPI will notify LEAs if waivers are granted or not

lide adapted from Bustein and Manasevit Fall 2012 Foru

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MOE: Example (10) Analysis for 2014-15 Aggregate **Amount per Student** Expenditures **Funds** 2011-12 Actual Amount \$1,000,000 \$6.100 90% of 2011-12 Amount \$900,000 \$5,490 2012-13 Actual Amount \$890,000 \$5,495 Difference <\$10,000> \$5 -1.11% 0% Percent Reduction in Award for 2014-15 Maintenance of Effort was met. Wisconsin Department of Public Instruction







Definition

- An LEA may receive Title I, Part A funds only if it uses state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in non-Title I schools
- If all schools in a grade span within the LEA are Title I schools, all schools must be "substantially comparable"

ESEA Section 1120A(c)

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Timing



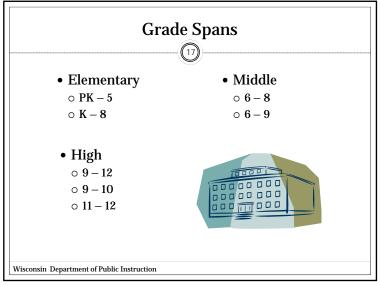
- • LEAs must determine comparability $\boldsymbol{\textit{annually}}$
 - o DPI is only required to collect comparability data at least once every two years
- Comparability is completed in the fall because LEAs need to review current-year resources and *make adjustments* for the current year as necessary

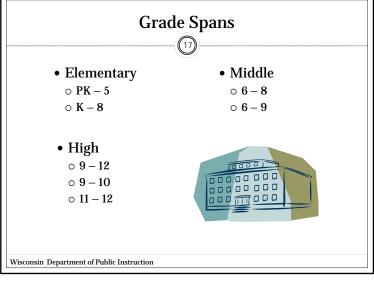
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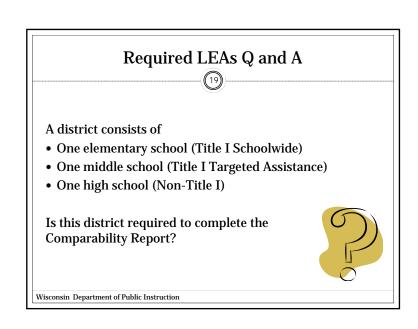
Required LEAs



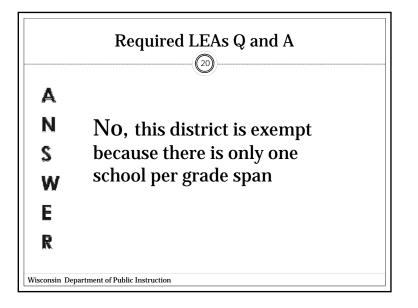
- Comparability is determined on a grade span-bygrade span basis
- If an LEA has at least one non-Title I school and at least one Title I school within a grade span, the LEA must demonstrate comparability for that grade span
- If an LEA has more than one Title I school at the same grade span (even without the presence of a non-Title I school), the LEA must demonstrate comparability for that grade span







Exemptions • LEAs are exempt if there is only one school per grade span (nothing to compare) $\circ\;$ Example: Phelps School District has two schools, a 4K - 8 and 9 - 12. Phelps School District is exempt from completing the comparability report. • Schools are exempt if the a school has fewer than 100 students Wisconsin Department of Public Instruction



Required LEAs Q and A



A district consists of

- One elementary school (Title I Schoolwide)
- One middle school (Title I Schoolwide)
- One high school (Title I Schoolwide)

Is this district required to complete the Comparability Report?



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Required LEAs Q and A



A district has

- Three elementary schools (all Title I Schoolwide)
- One middle school (Title I Targeted Assistance)
- One high school (Non-Title I)

Is this district required to complete the Comparability Report?



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Required LEAs Q and A



A

No, this district is exempt

because there is only one school per grade span

W

E

R

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Required LEAs Q and A



Yes, the district is required to complete the comparability report to

N demonstrate comparability among the

elementary schools only

W The district is not required to complete

the comparability report for the middle school because there is no

other school in that grade span to compare it to

Required LEAs Q and A



A district has four schools:

- Two elementary schools: PK 2 and 3 5
- One middle school: 6 8, and a
- One high school: 9 12.
- The two elementary schools receive Title I funds

Is this district required to complete the **Comparability Report?**



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Required LEAs Q and A



A district has four schools:

- One elementary school: PK 5 (TI Schoolwide)
- One middle school: 6 − 8 (TI Schoolwide)
- One high school: 9 − 12 (TI TAS)
- One alternative high school: 9 − 12 (Non-Title I)

Is this district required to complete the Comparability Report for the high school?



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Required LEAs Q and A



No, because the grade spans do not A overlap

Ν

S BUT, if the district had two PK -2

W

schools and two 3-5 schools that received Title I funds, then the

E

district would be required to

R

complete comparability for each

grade span

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Required LEAs Q and A



A Only if the district entered an

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enrollment greater than 100 students for the alternative high

school in the Title I application.

W

This district would be exempt from

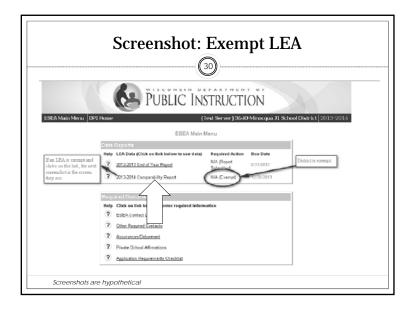
E

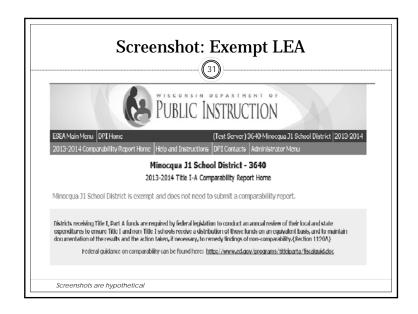
the comparability report if the alternative high school has less

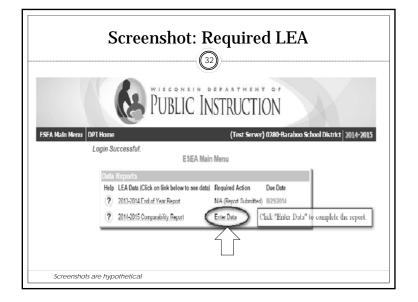
than 100 students.

Web-based Comparability Report

- (29)
- Log in into the LEA's ESEA Application
 Same user credentials as the application
- Submit the Title I application before completing the comparability report
- If an LEA is exempt from comparability, the link will state "N/A Exempt." No action is required
- Click the comparability report's "Enter Data" link on the ESEA Main Menu to complete the report





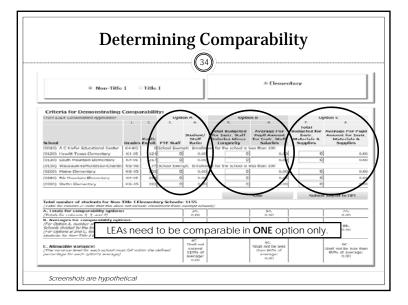


Determining Comparability



- LEAs should use current-year data
- LEAs should **not** include federal resources in the calculations
- LEAs *may* exclude state/local funds expended for:
 - Language instruction for LEP students;
 - o Excess costs of providing services to students with disabilities;
 - o Staff salary differentials for years of employment; and
 - o Supplemental programs that meet the intent and purpose of Title I (for example, SAGE)

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Definition of Instructional Staff



- Teachers and other personnel assigned to schools who provide direct instructional services
 - o Music, art, and physical education teachers; school counselors, speech therapists, and librarians
- Other personnel who provide services that support instruction
 - School social workers and psychologists
- The LEA must be consistent with the categories of staff included for its schools

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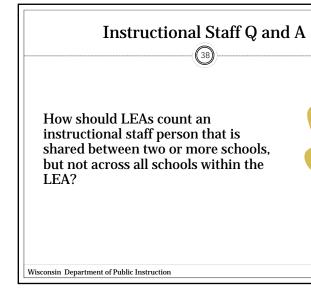
Instructional Staff Q and A

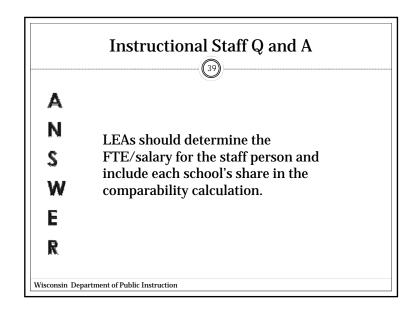


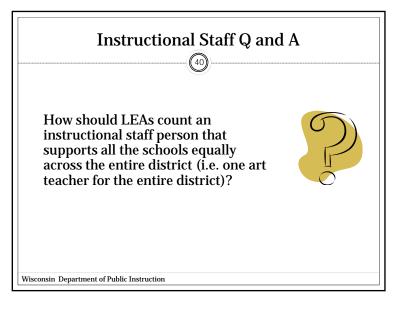
Should LEAs include teachers' aides in the calculations for instructional staff salaries or instructional staff?



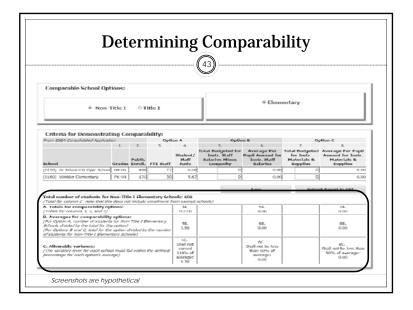
Instructional Staff Q and A A It depends on the function of the position N If the person is providing direct instructional support to students, then yes. This person is considered a paraprofessional and must be included in the calculation W If the person is providing other support services such as lunch/recess duty, taking attendance, making copies, and decorating bulletin boards, then no. This person shall not be used in the calculations for comparability Wisconsin Department of Public Instruction



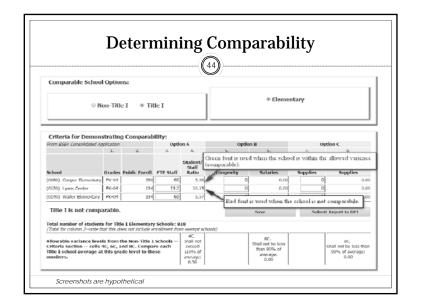


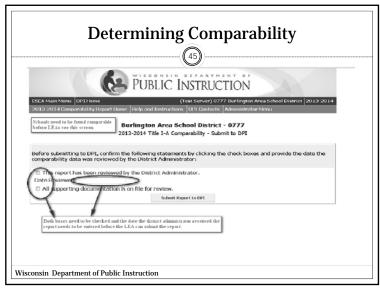


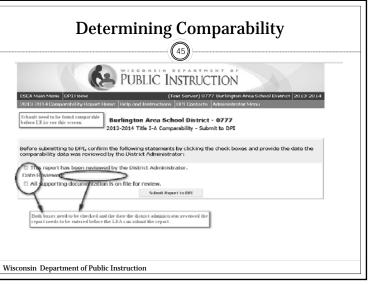
A LEAs could either divide the staff N person's time/salary equally for each school's comparability calculation or the LEA could exclude the staff w person from the comparability calculations for all of the schools. E Either way the LEA must be consistent across all schools R

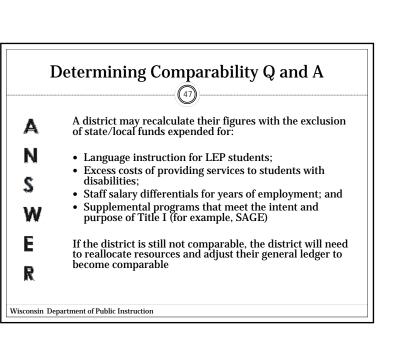


Definition of Instructional Materials Instructional materials and supplies include: General supplies for instruction; Instructional media; Textbooks and workbooks; Computers, software and other technology; and Library books and media center learning materials Wisconsin Department of Public Instruction









Determining Comparability Q and A



A district is required to demonstrate comparability between their three elementary schools (all of which are Title I receiving)

The district tried all three comparability options in the application, but they did not meet comparability



What should the district do?

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Determining Comparability



- When in doubt contact your Title I Consultant
 - o http://titleone.dpi.wi.gov/t1consultant_dir



Documentation



• LEAs shall:

- o Develop procedures to be in compliance with the comparability requirement
- \circ Maintain supporting documentation used for the web-based report



ESEA Section1120A(c)(3)

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Title I Comparability Requirements



Questions????

Contact your Title I Consultant for assistance http://titleone.dpi.wi.gov/t1consultant_dir

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Audits



At the end of the fiscal year, auditors make sure that actual expenditures are comparable.

If not, the consequence *may* result in returning funds to DPI/USDE.

