

Maintenance of Effort and Comparability under Title I, Part A

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Learning Objectives

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Maintenance of Effort

- Definition and purpose
- Calculations
- Consequences for failure
- Waivers

Title I Comparability

- Definition
- Timing
- Required LEAs
- Exemptions
- Web-based Report
- Documentation
- Audits

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MOE: Definition & Purpose

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- A year-by-year analysis to ensure LEAs are supporting core education in Title I schools.
- LEAs demonstrate MOE by either the combined fiscal effort per student OR the aggregate expenditures of the LEA.
 - From non-federal funds

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MOE: Calculations

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- 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 2014, DPI will compare 2012-13 school year expenditures to 2011-12 school year expenditures

Slide adapted from Brustein and Manasevitz Fall 2012 Forum

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MOE: Consequences for Failure

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- The state must reduce amount of allocation in the exact proportion by which LEA fails to maintain effort below 90 percent.
- Reduction applies all applicable ESEA programs that are still funded by USDE (not just Title I).



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MOE: Example

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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	\$950,000	\$5,495
Difference	\$50,000	\$5
Percent Reduction in Award for 2014-15	0%	0%

Maintenance of Effort was met.

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MOE: Example

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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: Example

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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	\$890,000	\$5,495
Difference	<\$10,000>	\$5
Percent Reduction in Award for 2014-15	-1.11%	0%

Maintenance of Effort was met.

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MOE: Waivers

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

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Maintenance of Effort

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QUESTIONS???

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Title I Comparability Requirement

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Definition

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- 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 the LEA are Title I schools, all schools must be “substantially comparable.”
- Comparability may be determined on a grade-span-by-grade span basis or a school-by-school basis.

Title I §1120A(c)

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Timing

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- LEAs must determine comparability **annually**.
 - 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

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- 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.

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Exemptions

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- LEAs are exempt if there is only one school per grade span (nothing to compare).
 - 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 less than 100 students.



Grade Spans

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- Elementary
 - PK – 5
 - K – 8
- Middle
 - 6 – 8
 - 6 – 9
- High
 - 9 – 12
 - 9 – 10
 - 11 – 12



Required LEAs Q and A

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A district consists of

- One elementary school (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?



Required LEAs Q and A

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**A
N
S
W
E
R**

No, this district is exempt because there is only one school per grade span.

Required LEAs Q and A

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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?



Required LEAs Q and A

20

**A
N
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R**

No, this district is exempt because there is only one school per grade span.

Required LEAs Q and A

21

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?



Required LEAs Q and A

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**A
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Yes, the district is required to complete the comparability report to demonstrate comparability among the ***elementary schools only***.

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

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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?



Required LEAs Q and A

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No, because the grade spans do not overlap.

Required LEAs Q and A

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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?



Required LEAs Q and A

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Only if the district entered an enrollment greater than 100 students for the alternative high school in the Title I application.

This district would be exempt from the comparability report if the alternative high school has less than 100 students.

Web-based Comparability Report

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

Determining Comparability

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- LEAs may use **one** of the following options to determine comparability in the web-based comparability report (option A, B, **OR** C):
 - A. Student/instructional staff ratio;
 - B. Student/instructional staff salary ratios; or
 - C. Instructional materials and supplies expenditures per pupil



Determining Comparability

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- 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;
 - Excess costs of providing services to students with disabilities;
 - Staff salary differentials for years of employment; and
 - Supplemental programs that meet the intent and purpose of Title I (for example, SAGE).

Determining Comparability Q and A

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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?



Determining Comparability Q and A

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**A
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E
R**

A district may recalculate their figures with the exclusion of state/local funds expended for:

- Language instruction for LEP students;
- Excess costs of providing services to students with disabilities;
- Staff salary differentials for years of employment; and
- Supplemental programs that meet the intent and purpose of Title I (for example, SAGE).

If the district is still not comparable, the district will need to reallocate resources and adjust their general ledger to become comparable.

Determining Comparability

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



Documentation

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- LEAs shall:
 - Develop procedures to be in compliance with the comparability requirement;
 - Maintain supporting documentation used for the web-based report; and
 - Maintain records that are updated biennially documenting compliance with the law.



Audits

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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.



Comparability

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QUESTIONS???

Contact Information

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