ESEA/ESSA's Maintenance of Effort Requirements and Title I Comparability Rating

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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 percent of combined fiscal effort or aggregate expenditure for the second preceding fiscal year.

(No change under ESSA)



Maintenance of Effort (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 ESSA funds if the State determines the LEA has maintained its fiscal effort.

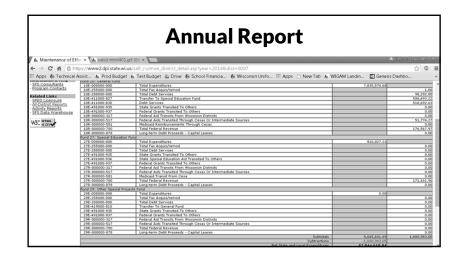
MOE: Calculations

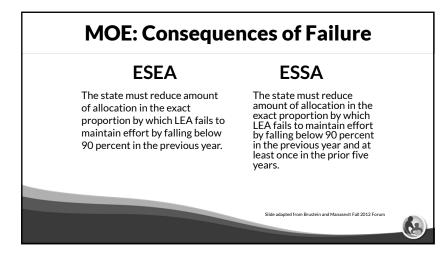
- The annual financial report (PI-1505) is used to determine MOE.
- Amount from preceding year must not be less than 90 percent of the second preceding year.

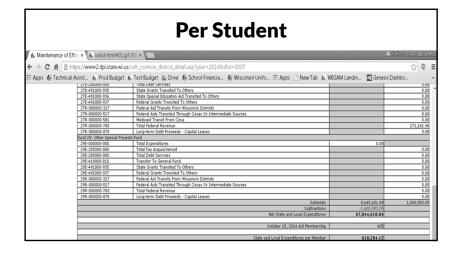
Example: To receive funds available July 2017, DPI will compare 2015-16 school year expenditures to 2014-15 school year expenditures.

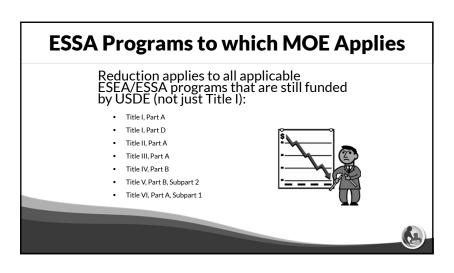












MOE: Example

Analysis for Meeting MOE in Previous Year	Aggregate Expenditures	Amount per Student		
2014-15 Actual Amount	\$1,000,000	\$6,100		
90% of 2014-15 Amount	\$900,000	\$5,490		
2015-16 Actual Amount	\$950,000	\$5,495		
Difference	\$50,000	\$5		
Percent Reduction in Award for 2017-18	0%	0%		

Maintenance of Effort was met.

MOE: Example

Analysis for Meeting MOE in Previous Year	Aggregate Expenditures	Amount per Student		
2014-15 Actual Amount	\$1,000,000	\$6,100		
90% of 2014-15 Amount	\$900,000	\$5,490		
2015-16 Actual Amount	\$890,000	\$5,495		
Difference (Shortfall)	<\$10,000>	\$5		
Percent Shortfall/ Reduction in Award for 2017- 18	-1.11%	0%		
10				

Maintenance of Effort was met.

MOE: Example

Analysis for Meeting MOE in Previous Year	Aggregate Expenditures	Amount per Student
2014-15 Actual Amount	\$1,000,000	\$6,100
90% of 2014-15 Amount	\$900,000	\$5,490
2015-16 Actual Amount	\$850,000	\$5,200
Difference (Shortfall)	<\$50,000>	<\$290>
Percent Shortfall/ Reduction in Award for 2017-18	-5.6%	-5.3%

Under ESSA, the 2017-18 funds will be reduced by 5.3 percent.

Under ESSA, the funds will be reduced by 5.3 percent if the LEA also failed MOE in one of the five prior fiscal years.

MOE: Waivers

ESEA

USDE Secretary may waive if:

there are exceptional or uncontrollable circumstances such as natural disaster

OR

precipitous decline in financial resources of the LEA.

ESSA

• USDE Secretary may waive if:

o there are exceptional or uncontrollable circumstance such as natural disaster <u>or</u> <u>change in organizational</u> <u>structure of the LEA</u>

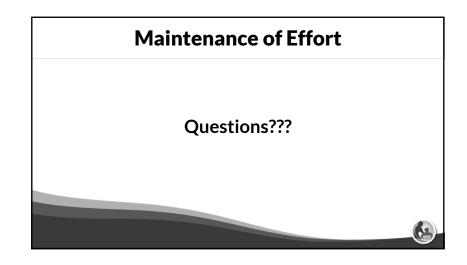
OR

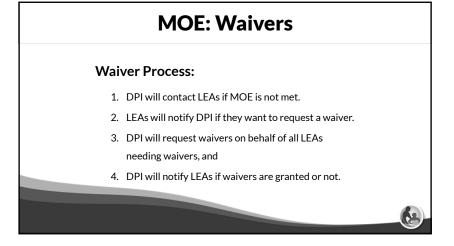
precipitous decline in financial resources of the LEA.

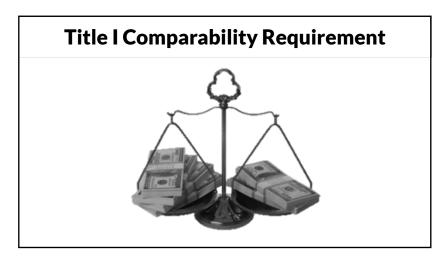
ide adapted from Brustein and Manasevit Fall 2012 Forun



MOE: Waivers Non-regulatory Guidance from USDE issued November 21, 2016: "In addition to these two examples listed in the statute, there can be other instances of exceptional or uncontrollable circumstances that might warrant when a waiver request will be considered."







Title I Comparability 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)

Required LEAs

- Comparability is determined on a grade span-by-grade 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.



Timing

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.



Grade Spans

Elementary

- PK-5

Middle School

- 6-8

- 9-10
- 11-12





Exemptions

 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 fewer than 100 students.



Required LEAs Q & A

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



Required LEAs Q & A

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?



A district consists of:

- 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 & A

- 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 & A

NO, because the grade spans do not overlap.

BUT, if the district had two PK - 2 schools and two 3-5 schools that received Title I funds, then the district would be required to complete comparability for each grade span.



Required LEAs Q & A

A district consists of:

- Two elementary schools (PK-2 and 3-5)
- One middle school (6-8)
- One high school (9-12)
- Two elementary schools receive Title I funds.

Is this district required to complete the Comparability Report?



Required LEAs Q & A

A district consists of:

- One elementary school (PK-5, TI Schoolwide)
- One middle school (6-8, TI Schoolwide)
- One high school (9-12, TI Targeted Assistance)
- One alternative high school (9-12, Non-TI)

Is this district required to complete the Comparability Report?

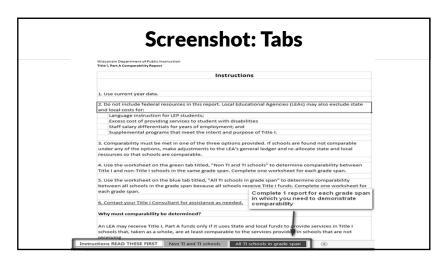


Required LEAs Q & A

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.





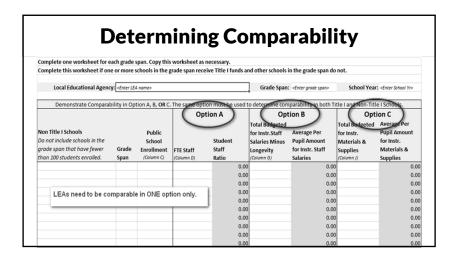
Comparability Report Workbook

- 2016-17 Comparability Report will not be collected by DPI.
- Districts required to complete the report should use the workbook which can be accessed here: http://dpi.wi.gov/title-i/forms#TIComRep
- Tab 1 provides instructions.
- Tabs 2 and 3 are for districts with TI and Non TI schools and then all TI schools in a given grade span.

Determining Comparability

- · LEAs should use current-year data.
- LEAs should not include federal resources in the calculations.
- LEAs may exclude state and local funds expended for:
 - language instruction for Limited English Placement students,
 - excess costs of providing services to students with disabilities.
 - staff salary differentials for years of employment, and/or
 - supplemental programs that meet the intent and purpose of Title I (for example, SAGE/AGR).





Instructional Staff Q & A

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



Definition of Instructional Staff

Teachers and other personnel assigned to schools who provide direct instructional services.

- 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

Instructional Staff Q & A

It depends on the function of the position:

If the person is providing direct instructional support to students, then <u>YES</u>.
 This person is considered a paraprofessional and <u>must be included</u> in the calculation.

<u>OR</u>

 If the person is providing other support services such as lunch or recess duty, taking attendance, making copies, and decorating bulletin boards, then <u>NO</u>.
 This person <u>shall not be used</u> in the calculations for comparability.



Instructional Staff Q & A

How should LEAs count an instructional staff person that is shared between two or more schools, but not across all schools within the LEA?

Instructional Staff Q & A

How should LEAs count an instructional staff person that supports all the schools equally across the entire district (i.e. one art teacher for the entire district)?



Instructional Staff Q & A

LEAs should determine the FTE/salary for the staff person and include each school's share in the comparability calculation.

Instructional Staff Q & A

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



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.



Determining Comparability									
Title I Schools Do not include schools in the grade span that have fewer than 100 students enrolled.	Grade Span	Public School Enrollment	Optic	Student Staff	Option Total Budgeted for Instr.Staff Salaries Minus Longevity (Column G)	Average Per Pupil Amount for Instr. Staff	Option Total Budgeted for Instr. Materials & Supplies (Column 1)	Average Per Pupil Amount for Instr. Materials & Supplies	
East	K-5	100							
West	K-5	200							
North	K-5	350							
				0.00		0.00		0.00	
				0.00		0.00		0.00	
				0.00		0.00		0.00	
				0,00		0.00		0.00	
				0.00		0.00		0.00	
				0.00		0.00		0.00	
				0.00		0.00		0.00	
Total number of students in Title schools in grade span	e I	650 Sum of column C							
Totals for comparability options		65.00 Sum of column D		1,700,000.00 Sum of column G		170,000.00 Sum of column J			
Averages for comparability options		10.00 Number of students in		2,615.38 Total for the option divided by the number		261.54 Total for the option divided by the			
If box stays blank then th	is grade s	pan is compara	ble I schools in	n grade span I for the option.	of students in Title I s	chools in the grade	number of student in the gra	s in Title I schools	
Allowable variance for the average The varience level for each school must fall within the defined percentage for each option's average.		11.00 Shall not exceed 110% of average		2,353.85 Shall not be less than 90% of average		235.38 Shall not be less than 90% of average			
Schools in grade span need to be comparab will appear if comparability is not met.	ole in one option.	. "Not Comparable"			Not Com	parable	Not Con	parable	

Instructional Staff Q & 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?



Instructional Staff Q & A

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.



LEAs shall:

- develop procedures to be in compliance with the comparability requirement, and
- maintain supporting documentation used for the report.



Determining Comparability

When in doubt, contact your Title I Consultant:

http://dpi.wi.gov/title-i/consultant-directory



Audits

- At the end of the fiscal year, auditors make sure that actual expenditures are comparable.
- If not, the consequences may result in returning funds to DPI/USDE.



Supplement Not Supplant

- ESSA made changes that are similar to comparability.
- USDE has not provided any clarification or guidance yet.



Title I Comparability Requirements

QUESTIONS???

Contact your Title I Consultant for assistance http://dpi.wi.gov/title-i/consultant-directory

