



Title I, Part A

SUPPLEMENT NOT SUPPLANT



Title I Spring Administrative Meeting 2019
Veronica Simmons, Section Chief-Family Support

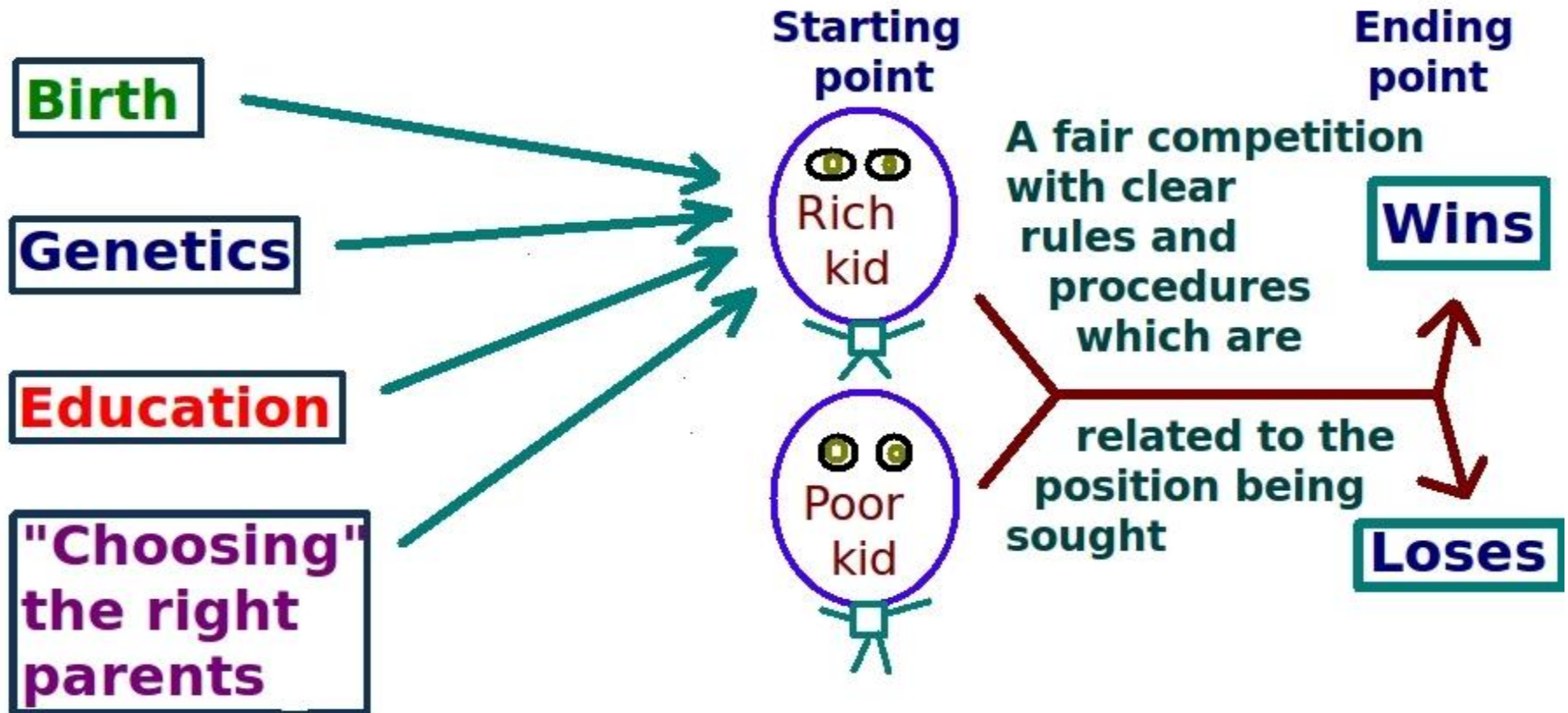
SESSION OUTCOMES

By the end of this session participants will:

- ★ **Strengthen Understanding of** supplement, not supplant requirements under ESSA
- ★ **Receive an overview** of methodology components & types
- ★ **Demonstrating Compliance** (understanding what evidence of implementation of SNS will look like during your annual program review and in the Title I Program Application)

WHY SNS IS IMPORTANT

Formal equality of opportunity



THE BIG

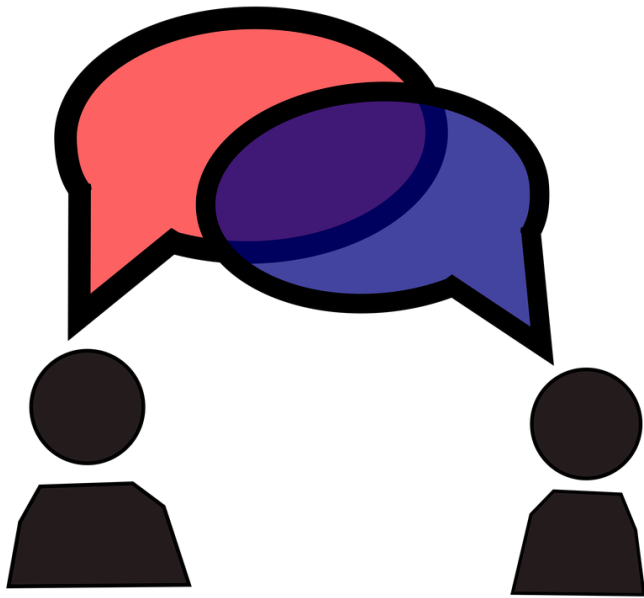


THE THREE **ANNUAL** FISCAL TESTS OF TITLE I, PART A

- ★ **COMPARABILITY**
- ★ **SNS**
- ★ **MAINTENANCE OF EFFORT**

SNS VS. COMPARABILITY

They sound alike. So, how are they different.





ALLOCATION IS TO _____

AS

METHODOLOGY IS TO _____

SHOW ME LAW!

An LEA shall demonstrate that the *methodology* used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives *all of the State and local funds* it would otherwise receive if were not receiving assistance under this part.
1118(b)(2)



RULES OF SUPPLEMENT NOT SUPPLANT

- Title I, Part A funds should *add* to (supplement) and not *replace* (supplant) state and local funds.
- Title One rules still apply! (Ask: Allowable, Reasonable, Necessary)
- Keep it **Title I Neutral**
- SNS is one three fiscal tests for Title I

NOW, BREAK IT DOWN LIKE A FRACTION.

IN OTHER WORDS:

1. **SNS**...REMEMBER TITLE I FUNDS ADD TO THE FUNDING POT
2. **TITLE I NEUTRAL**...DON'T FACTOR IN MY TITLE I FUNDING WHEN ALLOCATING FUNDING
3. **METHODOLOGY** = METHOD FOR DISTRIBUTION OF FUNDS

NOT TODAY...



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.

(ESEA section 1118(b)(3))

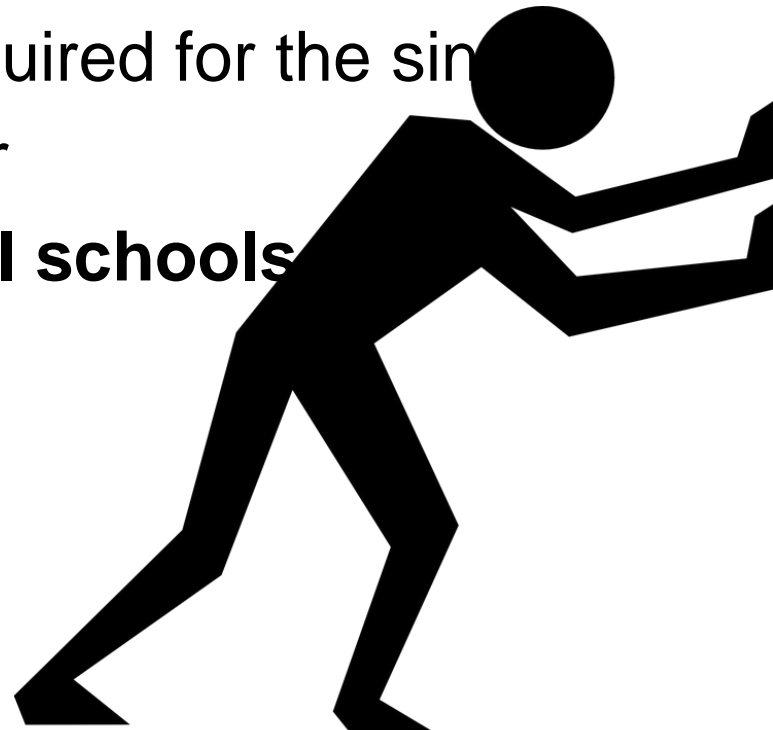
Exclusion of Funds

SEA or LEA may exclude supplemental **state** or **local** funds used for program that meet the *intents and purposes* of Title I Part A (Sec. 1118(d)).

- Excluded from SNS Methodology Test:
 - **Single School LEAs;**
 - **A grade span with a single school** (i.e., no methodology is required for the single school grade span); or
 - **LEAs with only Title I schools.**

Exclusion of Funds

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 - **LEAs with only Title I schools**



SO, WHAT REALLY CHANGED?



test

METHODOLOGY

An LEA shall demonstrate that the **methodology** used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives ***all of the State and local funds*** it would otherwise receive it if were not receiving assistance under this part.
1118(b)(2)

THINGS TO CONSIDER

- 1. When budget processing, how much is available for school operation in our systems?**
- 2. How many school do we have? Are all schools included in this plan?**
- 3. Do all schools in this plan require the same funding?**
- 4. Are all of my State/Local funds equitably distributed across school that are Title I and non Title I?**

WHAT'S INCLUDED IN MY LSSs METHODOLOGY?

1. Statement of Methodology (narrative explaining the methodology)
2. Type(s) of Methodology
3. Mathematical Calculation Formula

Does MSDE have a standard format or template that I can use?

TYPES OF METHODOLOGY

1. **Funding Formula** Weighted PPA
2. **Funding Formula** based on staffing & supplies
3. **Funding Formula** based on a combination approach (weighted PPA & staffing & supplies)
4. **Funding Formula** based on a locally developed methodology approved by the SEA

So, what's my role with SNS as the Title I Coordinator?



Who exactly is supposed to help me with SNS?

- LSS Finance Office (CFO)
- LSS Grants Manager
- MSDE Title I, Part A POC



QUESTION

DOES THE **STATE** HAVE TO
APPROVE MY METHODOLOGY?



QUESTION

CAN THE **STATE** GO ABOVE &
BEYOND STATUTE TO ENSURE
IMPLEMENTATION OF
THE LAW? CAN THEY
DO THAT!!!!?????



QUESTION

The statute of limitations for recovery of an unallowable cost is:

- a. One year from the date of obligation.
- b. Eighteen Months from the date of obligation.
- c. Three years from the date of obligation.
- d. Five years from the date of obligation.
- e. None of the above. There is no time limit on the recovery of funds.

QUESTION

When the State has reason to believe a local agency has failed to substantially comply with any federal program requirement, the state may suspend funds for:

- a. Up to 30 days.
- b. Up to 60 days.
- c. Up to 180 days.
- d. Up to one year.
- e. None of the above. The State may never suspend payments.

QUESTION

Must an LEA adjust its allocation of State and local resources to account for changes during the school year that might result in the LEA's non-compliance?

QUESTION

Compliant distribution methodology could vary based on:

1. Grade-span
2. School size
3. Student Needs
4. School model
5. Other factors, not based on Title I status
6. All of the above.

QUESTION

If I am compliant with comparability,
then I am also in compliance with
SNS, right?



REMEMBER

The ESEA requires an LEA to use Title I, Part A funds only for allowable costs; so, an LEA's use of Title I, Part A funds might not violate the supplement not supplant requirement but it might not be an allowable use of those funds.





19-20 SY TITLE I, PART A APPLICATION

NEW!

Required attachment: LSS will be required to submit the current school year methodology for their District.

ANNUAL PROGRAM REVIEW: SNS

2018-2019

- Written Methodology (narrative, funding formula, calculation) used to allocate State and local funds to each Title I school
- Sample school allocation amount (non-Title I and Title I schools)
- Time and effort for split funded **District** staff to include:
 - Job descriptions
 - Time and effort reporting
 - Personnel Activity Reports (PARs)

2019-2020

- **Title I Application (NEW!)**
 - Assurance
 - Required attachment
- Written Methodology (narrative, funding formula, calculation) used to allocate State
- **Applicable school year SAN Documentation from Title I Office meeting with LSS finance office to review current methodology** and local funds to each Title I school
- Sample school allocation amount (non-Title I and Title I schools)
- Time and effort for split funded **District** staff

QUESTION

Can my MSDE POC test my Title I, Part A expenditures for SNS compliance during my annual program review?



SNS NON-COMPLIANCE

- No official methodology in place
- Not Title I Neutral



NON-COMPLIANT

What happens if I'm found not in compliance for SNS during my annual program review?

- a. Nothing will happen. My POC won't really look at that.**
- b. My LSS will receive a finding.**
- c. What's SNS Again?**

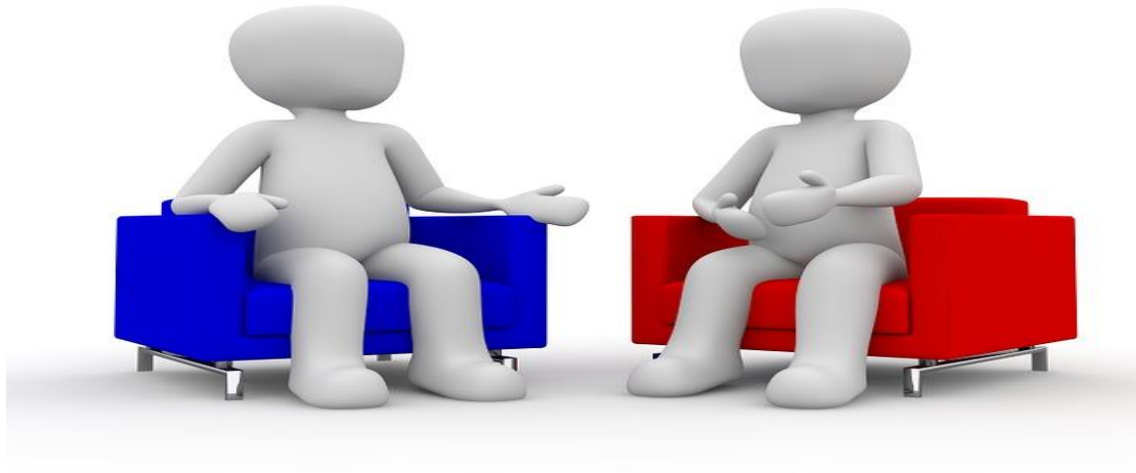
WHERE'S THAT NEW SNS GUIDANCE?

- USED issued new draft SNS regulatory guidance on January 25, 2019.
- Comments were requested by February 2019.
- Guidance is still pending, which means it can change.



WHERE'S THAT NEW SNS GUIDANCE?

It's PENDING.



QUESTIONS



THANKS

THANKS