

Title I, Part A Supplement not Supplant (SNS) Under ESSA

NOVEMBER 2017



Agenda

Background – SNS Under NCLB

SNS under ESSA

Examples

Actions

Consolidated Program Review (CPR)

Resources



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6/12/2019

SNS under NCLB

Title I, Part A funds must supplement (add to) and not supplant (replace) state and local funds.

Under NCLB, there were 3 presumptions of supplanting. For every individual cost, paid for by Title I, Part A, we had to ask ourselves the following:

1. Was the activity required by federal, state, or local law?
2. Was the activity paid for with state/local funds in the prior year?
3. Was the same service for Title I students paid for with state or local funds for non-Title students?

If the answer to any of the above was 'yes' – it was a supplanting violation.



SNS Under ESSA

Section 1118(b) governs Supplement not Supplant (SNS)

1118(b)(3)(A) tells us that we **no longer have to analyze individual costs**– in other words – those “three presumptions” are no longer applicable (YAY!).

1118(b)(2) – Instead, the LEA must demonstrate that the **methodology** used to allocate State and local funds to each school receiving Title I assistance ensures that each school receives all of the State and local funds it would otherwise receive if it were not receiving Title I, Part A dollars.

1118(b)(5)(A) - The deadline to develop and document this methodology is **December 10, 2017**.



Methodology

Section 1118(d) Exclusion of Funds:

“For the purpose of complying with subsections (b) and (c), an state-educational agency or local educational agency may exclude supplemental State or local funds expended in any school attendance area or school for programs that meet the intent and purposes of this part”

What exactly does this mean?

It means that **Learning Assistance Program (LAP) funds are not included in the methodology** – as it is a supplemental state funding source that has the same intent and purpose as Title I, Part A.

Other State categorical programs such as TBIP and State Special Education are included in the methodology.



Methodology

The ESSA compliance test looks at how an LEA distributes State and local funds to schools:

How the LEA distributes State and local funds and/or resources to its schools

- May vary from school to school based on school size, variations in programs offered in a school, special education services, etc.
- The distribution method must not reduce State and local funding and/or resources solely because a building has a Title I program
- LEA must follow its distribution process to ensure that Title schools receive all the State and local funds and/or resources they are entitled, had they not participated in Title I.

Exemption: LEAs with only one school are exempt from this requirement



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6/12/2019

Methodology

The LEA methodology for distributing State and local resources only applies to charges allowed under Title I, Part A as listed in the OSPI [SAFS](#) accounting manual

The methodology should address any of the following if allocated at the building level:

- Teaching
- Learning resources
- Guidance and counseling
- Supervision (administrative)
- Health related services
- Instructional professional development
- Instructional technology
- Curriculum
- Communications (such as translation for parent/family engagement)

Exclusions from the methodology:

- Centrally administered resources
- Costs that are Title I, Part A allowable only in limited circumstances
 - Maintenance & utilities
 - Student transportation
- Costs that are never allowable under Title I, Part A
 - Debt service
 - Capital expenditures
 - Building repair costs
 - Bus depreciation
 - Food service
 - Child nutrition



Methodology

An SNS methodology **does not have to be the same for every school** – it can vary based on needs of the student population (i.e. a weighted methodology):

- Grade span
- School size
- Student needs (ELL, newly arrived, special ed, etc.)
- School model (CTE, magnet, IB, etc.)
- Other factors, not based on Title I status



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6/12/2019

SIMPLE EXAMPLE FROM ED 2015 SWP GUIDANCE ON SNS (p.10)

Assume:

- 1 teacher per 22 students (\$65,000/teacher)
- 1 principal/school (\$120,000)
- 1 librarian/school (\$65,000)
- 2 guidance counselors/school (\$65,000/guidance counselor)
- \$825/student for instructional materials and supplies (including technology)

In a school of 450 students, the school would be expected to receive \$2,051,250 in non-Federal resources based on the following calculation:

Category	Calculation	Amount
1 principal	1 x \$120,000	\$120,000
1 librarian	1 x \$65,000	\$65,000
2 guidance counselors	2 x \$65,000	\$130,000
21 teachers	21 x \$65,000	\$1,365,000
Materials, Supplies	450 x \$825	\$371,250
		\$2,051,250

Schools do not have to use State/local funds for the specific positions in the chart (look to State/local rules) – the FTE-based model can be used as a proxy to generate State/local funds.

To meet the [NCLB schoolwide program SNS test, known as the] supplemental funds test, an LEA would need to distribute non-Federal resources according to the assumptions above to all of its schools, regardless of whether a school receives Title I funds and operates a schoolwide program. This example does not, however, suggest that non-Federal funds must be used to support the activities in the table above; rather, Title I funds may be used to support any activity identified by the comprehensive needs assessment and articulated in the comprehensive schoolwide plan.



Methodology

The compliance test does not look at how the LEA or school spends Title I, Part A funds, however, other requirements still apply:

- School eligibility
- Student eligibility
- Meet the intent and purpose of Title I, Part A
- Federal cost principles/allowability



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6/12/2019

10

WEIGHTED STAFFING STANDARD MODELS FOR 2017-18

ELEMENTARY SCHOOLS

Items highlighted in YELLOW were revised 3/28/2017

Elementary General Education Teacher Funding Ratios		
	High Poverty Schools	Non-High Poverty Schools
Kindergarten	20:1	22:1
1st Grade	20:1	24:1
2nd Grade	21:1	25:1
3rd Grade	24:1	25:1
4th Grade *	27:1	27:1
5th Grade *	27:1	27:1

12.5% Preparation Conference & Planning (PCP)
time; allocations are rounded-up to nearest 1.0 FTE
for Teachers and up to nearest .5 FTE for PCP.

* The grade 4-5 class size target is 28 students; the allocation for high poverty schools has been enhanced to allow some flexibility to manage class sizes across all K-5.

Elementary Core Administrative and Support Staffing Ratios					
Elementary School Core Staffing Using Student Head Count	≤300	301-450	451-600	601-750	751+
Principal	1.0	1.0	1.0	1.0	1.0
Admin Secretary - 220	1.0	1.0	1.0	1.0	1.0
Elementary Asst Secretary - 201	0.5	1.0	1.0	2.0	2.0
Librarian	0.5	0.5	0.5	1.0	1.0
Certificated Core Staff			0.5	0.5	0.5
House Administrator					1.0
Nurse **	0.2	0.3	0.4	0.5	0.5

** Nurses allocated thru the WSS formula are staffed centrally.

Elementary Counselor / Social Worker / Head Teacher	
0.5 position for school that is:	Focus or Priority, or Greater than 50% poverty per OSPI, or Social/Emotional Behavior program

EXAMPLE : Non-High Poverty School		
	Student AAFTE	Teacher Calculation
Kindergarten	70	3.182
1st Grade	72	3.000
2nd Grade	68	2.720
3rd Grade	67	2.680
4th Grade	67	2.481
5th Grade	65	2.407
Sub-Total	409	16.47
Rounded Teacher FTE		17.00
PCP @ 12.5% (rounded)		2.50
Total Teacher Allocation		19.50

A single 0.5 FTE that can be used to staff an Elementary Counselor, Social Worker or Head Teacher position will be allocated to Elementary Schools that meet at least one of the criteria (above). Schools may not waive positions for Elementary Counselor/Social Worker/Head Teacher and will not receive budget differential for selecting a less-costly position among those three choices.

Assistant Principal Staffing Ratios	
Cert. Teacher FTE Allocated Thru WSS Model	Assistant Principal FTE
> 23 FTE	0.5
> 27 FTE	1.0
> 37 FTE	2.0
> 61 FTE	3.0

Assistant Principal allocations are based on Certificated Classroom Teacher FTE generated by the WSS model for General, Special, and Bilingual Education including allocations for PCP time.

Elementary Special Education Staffing Ratios			
	Ratios	Teachers	IAS
Resource - Continuum	22:1:0	22:1	22:0
Resource - Satellite	18:1:1	18:1	18:1
Access - Elementary	10:1:3	10:1	10:3
Focus - @ identified Elem & K8	10:1:2	10:1	10:2
SM2	9:1:1	9:1	9:1
Social/Emotional	10:1:2	10:1	10:2
Distinct & SM4	7:1:2	7:1	7:2
Medically Fragile	6:1:2	6:1	6:2
Preschool (½ ea for AM and PM)	10:1:2	10:1	10:2

Special Education Resource Staffing is rounded up to the nearest 0.2 FTE at the school level.

Elementary Bilingual Teacher Ratios	
Elementary TBIP/ELL	70:1

Bilingual/ELL Teachers are rounded up to the nearest 0.2 FTE at the school level.

Discretionary Allocations - Elementary Schools			
Per-Pupil Allocation (80% allocated in Adopted Budget)	\$93.50	x projected headcount	
Free & Reduced Lunch Allocation Kindergarten	\$213.85	x Jan 2017 FRL count	
Grades 1 - 3	\$243.35	x Jan 2017 FRL count	
Grades 4 - 5	\$309.71	x Jan 2017 FRL count	

80% of Per-Pupil Discretionary is allocated as part of Adopted Budget; 20% is held centrally until after the fall enrollment adjustments, and is distributed based on actual enrollment as of October 1.



MIDDLE SCHOOLS

Items highlighted in YELLOW were revised 3/28/2017

Middle School General Education Teacher Funding Ratios	
All Schools	
Grades 6-8	30:1

20.0% Preparation Conference & Planning (PCP) time for grades 6-8; allocations rounded-up to nearest 0.2

EXAMPLE: Middle School			
	Student AAFTE	Adjusted for Contact Time *	Teacher Calculation
6-7 Grades	876	811	27.033
Rounded Teacher FTE			27.20
PCP @ 20% (rounded)			5.60
Total Teacher Allocation			32.80

* General Education enrollment at the Secondary level is adjusted for student contact time in special programs, for students who receive specialized services during the school day.

Estimated Contact Times for Special Programs		
Bilingual		40%
Special Education	Resource	20%
Special Education	Access	60%
Special Education	Focus/SM2 & DHH	60%
Special Education	Social Emotional	60%
Special Education	Distinct/SM4 & MedF	80%

Middle School Core Administrative and Support Staffing Ratios			
Middle School Core Staffing Using Student Head Count	≤ 700	701-900	901+
Principal	1.0	1.0	1.0
House Administrator			1.0
Admin Secretary - 260	1.0	1.0	1.0
Asst Secretary - 201		1.0	1.0
Attendance Specialist	1.0	1.0	1.0
Data Registrar - 220	1.0	1.0	1.0
Librarian	1.0	1.0	1.0
MS Counselor *		* 400 : 1	
Certificated Core Staff	0.5	0.5	0.5
Nurse **	0.5	0.5	0.5

* Secondary counselors are assigned on a ratio of approximately 400:1.

** Nurses allocated thru the WSS formula are staffed centrally.

Assistant Principal Staffing Ratios	
Cert. Teacher FTE Allocated Thru WSS Model	Assistant Principal FTE
> 23 FTE	0.5
> 27 FTE	1.0
> 37 FTE	2.0
> 61 FTE	3.0

Assistant Principal allocations are based on Certificated Classroom Teacher FTE generated by the WSS model for General, Special, and Bilingual Education including allocations for PCP time.

Middle School Special Education Staffing Ratios			
	Ratios	Special Education Teachers	Special Education IAs
Resource - Continuum	22:1:0	22:1	22:0
Access - Elementary	10:1:3	10:1	10:3
Access - Grades 6-8	13:1:3	13:1	13:3
Focus - @ identified Elem & K8	10:1:2	10:1	10:2
SM2	9:1:1	9:1	9:1
Social/Emotional & SM3	10:1:2	10:1	10:2
Distinct - @ identified Elem & K8	7:1:2	7:1	7:2
SM4	7:1:2	7:1	7:2
Medically Fragile	6:1:2	6:1	6:2

Special Education Resource Staffing is rounded up to the nearest 0.2 FTE at the school level.

Middle School Bilingual Teacher Ratios	
Grades 6-8	45:1

Bilingual/ELL Teachers are rounded up to the nearest 0.2 FTE at the school level.

Discretionary Allocations - Middle Schools			
Per-Pupil Allocation	Grades 6 - 8	\$193.50	x projected headcount
Free & Reduced Lunch Allocation	Grades 6 - 8	\$535.85	x Jan 2017 FRL count

80% of Per-Pupil Discretionary is allocated as part of Adopted Budget; 20% is held centrally until after the fall enrollment adjustments, and is distributed based on actual enrollment as of October 1.



NON-TRADITIONAL SCHOOLS

Due to the unique nature of the various programs in Non-Traditional Schools, the funding allocation varies according to needs of specific programs.

"ALE" (Alternative Learning Program) schools are allocated budget in state program 02. Skills Center is allocated budget in state program 45.

Non-Traditional General Education Instructional Staffing Ratios		
Revised 3/24/2017		
Cascade Parent Partnership (ALE)	K-12	1:60
Center School	9-12	1:29
InterAgency (ALE)	9-12	1:25
Middle College (ALE)	9-12	1:29
NOVA (ALE)	9-12	1:29
South Lake	9-12	1:25
World School	6-12	1:28
Skills Center		varies
Original Van Asselt (special ed programs)		varies

Discretionary Allocations - Non-Traditional Schools			
Per-Pupil Allocation	Elem Grades K-5	\$93.50	x projected headcount/AAFTE
	Grades 6 - 12	\$193.50	x projected headcount/AAFTE
	Cascade PP ONLY	\$765.00	x projected headcount/AAFTE
Free & Reduced Lunch Allocation	Kindergarten	\$213.85	x Jan 2017 FRL count
	Grades 1 - 3	\$243.35	x Jan 2017 FRL count
	Grades 4 - 5	\$309.71	x Jan 2017 FRL count
	Grades 6-8	\$535.85	x Jan 2017 FRL count
	Grades 9-12	\$548.14	x Jan 2017 FRL count

80% of Per-Pupil Discretionary is allocated as part of Adopted Budget; 20% is held centrally until after the fall enrollment adjustments, and is distributed based on actual enrollment as of October 1.

Non-Traditional Non-Instructional Staff Ratios									
Job Title	Cascade PP	Center School	Inter Agency	Middle College	Nova	South Lake	World School	Skills Center	Orig VanA
Principal	1	1	1	1	1	1	1	1	1
Assistant Principal			2		1	1			
Librarian							0.5		
Counselor	1.5	1	2	1	0.8	1	0.75		
House Administrator							1		
Other Certificated Staff		0.6	1			2			
Admin Secretary		1	1	1	1	1	1		
Other Secretary							0.5		
Attendance Specialist		0.7	1	1					
Fiscal Specialist/Clerk			1	1			0.5		
Office Specialist	1								
Data Registrar/Assistant	1		1	1		1		0.85	1
Correctional Ed. Assc.			8			1			
Truancy Specialist						0.5			
Other Classified Staff	1		4						
Nurse		0.2	1	0.2	0.2	0.2	0.3		

Full Methodology



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6/12/2019

Other Considerations

There are three fiscal tests – they are all separate and measure different things – just because you are in compliance with one does not mean you are in compliance with all.

Maintenance of effort – LEAs must maintain a consistent floor of State and local funding for free public education from year to year.

Comparability – State and local funds are used to provide service that, taken as a whole, are comparable between Title I and non-Title schools.

Supplement not supplant – LEAs must distribute State and local funds to schools without taking into account a school's participation in Title I, Part A.



Actions

1. First, **meet with your Business Office and other key decision makers** at the district (Superintendent, Principals, etc.) to see if there is already a methodology in place for distributing state and local funds – chances are you probably already have something!
2. Make sure that the process does not reduce funding because of Title I status – if it does – revisions will need to be made.
3. Clearly document your methodology and have it readily available
4. Make sure there are internal controls in place to verify that the methodology is followed during the distribution process, beginning with the 2018-19 school year.



Consolidated Program Review (CPR)

1.17 Supplement, Not Supplant

Title I, Part A funds must be to supplement, and not supplant, the funds that would, in the absence of Title I funds, be made available from state and local sources. The

LEA must demonstrate that the methodology used to allocate state and local funds to each school ensures that schools receive all of the state and local funds it would otherwise receive if it were not receiving Title I funds. Sec 1118(b)

Resources:

[Title I, Part A; ESSA: A Fiscal Handbook](#)

LEA Level

☐ A. Provide a written description of your methodology for distributing state and local funds to buildings. Additionally, include:

- How the district's methodology ensures that state and local resources are not reduced based on Title I status.
- How the district will ensure that the methodology for distribution will be followed going forward.

☐ B. Upload documentation (i.e. spreadsheet, template, etc.) that demonstrates the district's process for distributing state and local funds to buildings.

Note: The date of implementation for ESSA's SNS requirement was 12/10/2017.

Supplement not Supplant will be reviewed during OSPI's CPR process this year.



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6/12/2019

16

Please Share Your Methodology

- Many districts are hoping to see more examples of SNS methodologies – if your district has one available, please send it to Jamey.Schoeneberg@k12.wa.us.
- We plan to post a few methodology examples on the Title I, Part A webpage as they come in.
- Please keep in mind, we are not collecting these for the purpose of reviewing/approving them.



Resources

[CCSSO's SEA Considerations for Title I, Part A's Revised SNS](#)

[CCSSO's ESSA's Title I, Part A Supplement not Supplant Requirement](#)



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6/12/2019

Questions?

Please email any questions you have to Jamey.Schoeneberg@k12.wa.us .



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6/12/2019

19