Supplement, Not Supplant

Association for Compensatory Educators of Texas
Austin, Texas
April 23, 2019

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Slido.com for Questions

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Agenda

• SNS Overview
  • Traditional SNS
  • SNS Methodology
  • Exemptions
  • Roadmap to State/local funds
  • Methodology options
  • Monitoring
Program Office and Business Office
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• SNS Handbook (version 3.1—December 2018)

https://tea.texas.gov/WorkArea/DownloadAsset.aspx?id=25769805407

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• SNS Handbook
  • Traditional SNS requirement (Section A)
  • Title I SNS requirement (Section B)

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• SNS Handbook

  • Traditional SNS requirement (Section A)

  • Title I SNS requirement (Section B)

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Traditional SNS Requirement

• Most federal programs with SNS provision still use traditional documentation.

• Program activities must be used to enhance, expand, or extend required activities.
Traditional SNS Requirement

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Traditional SNS Requirement

Federal (supplemental to S/L)
State/local

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Traditional SNS Requirement

Federal (supplemental to Fed.)
Federal (supplemental to S/L)
State/local

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Traditional SNS Requirement

• Presumptions of Supplanting:
  • Provide services required by State or local law;
  • Provide same services as those provided in prior school year with State or local funds;
  • Provide same services in Federal and non-Federal programs.

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• Revised SNS Handbook

  • Traditional SNS requirement (Section A)

  • Title I SNS requirement (Section B)

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Title I SNS Requirement

• Most flexible and easily documented:
  • Methodology to ensure campuses get all state/local funds they would get in the absence of Title I funds,
  • Then Title I funds at campuses are supplemental.

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Title I SNS Requirement

• All LEAs that receive Title I funds
  • Methodology for distributing State and local funds to all its campuses;
    OR
  • Statement of Exemption

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Title I SNS Requirement

• All LEAs that receive Title I funds
  • Methodology for distributing State and local funds to all its campuses;
  
  OR

• Statement of Exemption

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Title I SNS Requirement

- Exemptions from Methodology requirement
- Single campus (only one school in district)

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Title I SNS Requirement

- Exemptions from Methodology requirement
  - Single campus per school category:
    Elementary, Middle School, High School
    (no grade duplication)

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Title I SNS Requirement

• Exemptions from Methodology requirement
  • Single campus per school category
    (no grade duplication)

Two schools in elementary category
= LEA not exempt
Title I SNS Requirement

- Exempt or Not Exempt?

PK-5  6-8  K-8  9-12
Title I SNS Requirement

- Exempt or Not Exempt?

PK-5 6-8 K-8 9-12

Grade duplication = LEA not exempt

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Title I SNS Requirement

• Exempt or Not Exempt?

PK-2  3-5  6-8  9-12

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Title I SNS Requirement

• Exempt or Not Exempt?

PK-2  3-5  6-8  9-12

Two schools in elementary category
= LEA not exempt

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Title I SNS Requirement

• Exempt or Not Exempt?

PK-8

9-12

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Title I SNS Requirement

• Exempt or Not Exempt?

Single campus per school category and no duplication of grades = LEA exempt

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Title I SNS Requirement

• Statement of Exemption

Example in Handbook (Section F)
Title I SNS Requirement

• Statement of Exemption

Must include:

• Statement of statute
• Reference to type of exemption from TEA guidance
• Statement of exemption
• School year!!!

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SNS Methodology

• Title I Requirement

BUT

• SNS Methodology allocates State/local dollars

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State/Local Funds

• Roadmap...

How to find the amount of State/Local funds that must be included in the methodology?

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FAR Codes

• Financial Accountability System Resource Guide (FASRG)


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FAR Codes

• Financial Accountability System Resource Guide
  • Module 1—Financial Accounting and Reporting (FAR) [Account Code Structure, p. 219]
  • Module 1—Appendices [Appendix 5, Account Code Listings]
    ▪ Fund Codes
    ▪ Function Codes
    ▪ Organization Codes
    ▪ Program Intent Codes

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FAR Codes

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State/Local Funds

- Fund Codes 103-199

103-199 Funds, excluding Org Codes 699-999 [May exclude SCE funds that are used for a Title I-like program.]

Note: Methodology should ensure only students in grades 6-12 benefit from H.S. Allotment.
SNS Methodology

• Options:
  • Single methodology that is used districtwide
  • Separate methodology components for each campus category (Elementary, Middle School, High School)
  • Separate methodology components for certain categories of funds (i.e., High School Allotment, Special Education, etc.) and another methodology for balance of general funds, making up the overall methodology.
Title I SNS Requirement

• Methodology Components
  1. Statement of the methodology—In description of methodology, LEA must:
     a. State whether distribution is districtwide or by grade span
     b. State type of methodology used (per-pupil, weighted per-pupil, personnel/non-personnel costs, or other)
     c. Include restatement of the statute/purpose of SNS
Title I SNS Requirement

• Methodology Components
  2. Criteria used—In description of methodology, LEA must include:
     a. Per-pupil amount(s) for district or campus categories
     b. Weights assigned (if any)
     c. Classes of personnel/non-personnel costs (if applicable)
     d. Other (specify)
Title I SNS Requirement

• Methodology Components

3. Mathematical calculation formula

The campus allocations that are generated by the methodology must be reflected in the general ledger!

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Title I SNS Requirement

- Methodology Examples in Handbook (Section E)
  - Simple per-pupil amount districtwide
  - Per-pupil by grade span
  - Weighted student formula
  - Personnel/non-personnel costs

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Title I SNS Guidance

- Non-regulatory guidance from USDE is in development.
- Public comment period ended February 28.
- SNS Handbook will be updated after guidance is issued.

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Title I SNS Guidance

District-level Title I expenditure:
- Traditional SNS documentation

Campus-level Title I expenditure:
- SNS Methodology or Statement of Exemption
Title I SNS Monitoring

- 2018-2019
  - Random Validations

- 2019-2020
  - Random Validations
  - Follow-up with LEAs needing assistance based on 2018-2019 validation
  - Monitoring Reviews by Federal Fiscal Monitoring Division

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Make the Connection!

- Auditors will check to see that allocation amounts generated by SNS methodology are reflected in the general ledger.

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Questions?

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