

Title I, Part A Supplement, Not Supplant Methodology

Cory Green, Associate Commissioner
Contracts, Grants and Financial Administration
Texas Education Agency

- ▶ This guidance is in draft form from TEA.
- ▶ This guidance will be finalized the week of April 23, 2018, and will be posted and provided to ESCs in a usable format that week.



Title I, Part A Statute



(1) IN GENERAL.—A State educational agency or local educational agency shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under this part, and not to supplant such funds.



(2) COMPLIANCE.—To demonstrate compliance with paragraph (1), a local educational agency 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 it were not receiving assistance under this part.



Methodology and Implementation

- ▶ ESSA methodology required at the start of 2018-2019 SY
- ▶ Applies to all Title I served campuses
- ▶ Most flexible and easily documented S/NS requirement
- ▶ Does not apply to district-level activities or other ESSA programs



Flexibility in Methodology



Methodology may be Districtwide or by Grade Span

- ▶ An LEA may demonstrate compliance on a districtwide or grade-span basis (e.g., elementary, middle school, high school)
- ▶ If using grade-span, you may only use three grade spans (elementary, middle school, and high school)



Single School/Grade Span in LEA may be Exempt from Methodology

An LEA is not required to meet the methodology compliance requirement if it has:

- ▶ a single campus
(only one school in the district), or
- ▶ a single campus serving grade span
(no grade duplication; if exempt from Comparability because no grade duplication then exempt from SNS methodology).



May Exclude “Title I Like” State and Local Program Funds

- ▶ An LEA may exclude supplemental *state* or *local* funds expended for programs that meet the intent and purposes of Title I, Part A.
- ▶ For example: SCE program provides additional services only for students most at risk of not meeting State academic standards.



Components of the Methodology



Suggested Components

- ▶ Statement of the methodology
 - Districtwide or by grade span
 - Type of methodology (per-pupil, weighted per-pupil, or personnel and non-personnel costs)
 - Restatement of statute (fair and equitable distribution....state and local funds...ensure Title I campuses receive....)



Suggested Components

- ▶ Components of the Methodology
 - District per pupil
 - Weights, if any
 - Classes of personnel, if applicable
 - Etc.



Suggested Components

- ▶ Mathematical calculation formula
 - Give the auditor the math formula showing how you calculated the methodology per campus
 - Otherwise, the auditor will determine his own calculation of your methodology



May Exclude Districtwide State and Local Funded Activities

- ▶ An LEA may exclude *state* or *local* funds used for districtwide activities, (e.g., administration, summer school, preschool), as long as each Title I school receives an equal or greater share than each non-Title I school.



Examples of Methodologies

The following examples show how an LEA may demonstrate that it has used a fair and consistent methodology to allocate funds to its campuses and meet the supplement, not supplant requirement.



Methodology Examples

1. Distribution by Student
(per-pupil)
2. Distribution by Student Characteristics
(weighted per-pupil)
3. Distribution by Personnel and Non-personnel
Expenditures
(per-personnel position plus per-pupil)



Distribution by Student (per-pupil)

A simple districtwide per-pupil formula distributing state and local funds based on the number of students in each school, so that each Title I school receives for its use all of the funds to which it is entitled under the formula.



Distribution by Student (per-pupil)

- ▶ Applicable for smaller and rural LEAs with fewer different fund sources or fewer campuses



Distribution by Student Characteristics (weighted per-pupil)

A districtwide per-pupil formula weighted based on the characteristics of students in each school, such that:

1. Student characteristics, such as living in poverty, English learners, students with disabilities, and other such subgroups may generate additional funding for their school; and
2. Each Title I school receives for its use all of the funds to which it is entitled under the formula.



Distribution by Student Characteristics (weighted per-pupil)

- ▶ Applicable for smaller and rural LEAs
- ▶ Applicable for larger LEAs with greater numbers of students with differing characteristics
- ▶ The larger the LEA student characteristics, the more complex the methodology may become



TEA Supplemental Funds Test on TEA Web Site

- ▶ Example 2 on the website is an example of a Distribution by Student Characteristics (weighted per-pupil) methodology



Distribution by Personnel and Non-personnel Expenditures

A districtwide personnel and non-personnel resource formula such that each Title I school receives for its use an amount of actual State and local funds at least equivalent to the **sum** of:

1. The average districtwide salary for each category of school personnel (e.g., teachers, principals, librarians, school counselors), multiplied by the number of those personnel in each category assigned by the formula to the school; and
2. The average districtwide per-pupil expenditure for non-personnel resources, multiplied by the number of students in the school.



Distribution by Personnel and Non-personnel Expenditures

- ▶ Applicable for larger LEAs with greater numbers of students with differing characteristics and larger numbers of campuses
- ▶ The larger the LEA student characteristics and number of campuses, the more complex the methodology may become



TEA Supplemental Funds Test on TEA Web Site

- ▶ Example 1 on the website is an example of a distribution methodology by Personnel and Non-personnel Costs



Practice



DEPARTMENT OF
CONTRACTS, GRANTS & FINANCIAL ADMINISTRATION

Using the following information, write a weighted per-pupil methodology

- ▶ District per pupil is \$1000
- ▶ 200 students on campus
- ▶ 100 Economically Disadvantaged students
- ▶ 23 LEP students
- ▶ 8 SWD
- ▶ 24 GT students
- ▶ 9 students 1 grade level behind
- ▶ 7 students 2 grade levels behind

Student Characteristic Weights

- ▶ 1.0 – Economically Disadvantaged Student
- ▶ 0.2 – English Language Learner
- ▶ 0.2 – Students 1 grade level behind
- ▶ 0.4 – Student with Disability



Using the same information, calculate the campus' weighted per-pupil allocation

- ▶ District per-pupil is \$1000
- ▶ 200 students on campus
- ▶ 100 Economically Disadvantaged students
- ▶ 23 LEP students
- ▶ 8 SWD
- ▶ 24 GT students
- ▶ 9 students 1 grade level behind
- ▶ 7 students 2 grade levels behind

Student Characteristic Weights

- ▶ 1.0 – Economically Disadvantaged Student
- ▶ 0.2 – English Language Learner
- ▶ 0.2 – Students 1 grade level behind
- ▶ 0.4 – Student with Disability



Methodology Implementation

- ▶ $200 \times \$1000$ per student = \$200,000
- ▶ 100×1.0 per EcoDis student $\times \$1000$ = \$100,000
- ▶ 23×0.2 per ELL student $\times \$1000$ = \$4600
- ▶ 16×0.2 per student 1 grade behind $\times \$1000$ = \$3200
- ▶ 8×0.4 per SWD $\times \$1000$ = \$3200

Total Campus Allocation = \$311,000



Cory Green

Associate Commissioner
Contracts, Grants and Financial Administration
Texas Education Agency
(512) 463-8992
cory.green@tea.texas.gov



Copyright © Notice. The materials are copyrighted © and trademarked ™ as the property of the Texas Education Agency (TEA) and may not be reproduced without the express written permission of TEA, except under the following conditions:

1. Texas public school districts, charter schools, and Education Service Centers may reproduce and use copies of the Materials and Related Materials for the districts' and schools' educational use without obtaining permission from TEA.
2. Residents of the state of Texas may reproduce and use copies of the Materials and Related Materials for individual personal use only without obtaining written permission of TEA.
3. Any portion reproduced must be reproduced in its entirety and remain unedited, unaltered and unchanged in any way.
4. No monetary charge can be made for the reproduced materials or any document containing them; however, a reasonable charge to cover only the cost of reproduction and distribution may be charged.

Private entities or persons located in Texas that are not Texas public school districts, Texas Education Service Centers, or Texas charter schools or any entity, whether public or private, educational or non-educational, located outside the state of Texas MUST obtain written approval from TEA and will be required to enter into a license agreement that may involve the payment of a licensing fee or a royalty.

For information contact: Texas Education Agency, 1701 N. Congress Ave., Austin, TX 78701-1494; email: copyrights@tea.texas.gov.

