



WDE Guidance on Title I A Supplement Not Supplant Requirements

The Every Student Succeeds Act (ESSA) requires that school districts annually demonstrate that Title I funds are supplemental to state and local funds. Under No Child Left Behind (NCLB), supplanting was determined by reviewing individual expenditures. With the change in statute, districts must submit documentation to show that the methodology utilized to distribute state and local funds ensures that all schools are receiving the state and local funds that they would receive even if they were not receiving Title I funds. This demonstration of allocation of state and local funds is in addition to, not in lieu of, the annually submitted comparability calculations.

This methodology must be submitted to the Wyoming Department of Education (WDE) by December 1, 2017. Beginning in the 2018-19 School year, the documentation will be submitted through the consolidated grant application. Districts must also post the methodology on the district website in a place that is easily accessible by parents and the general public. It is not required by ESSA to provide the annual calculations of the district methodology, however, the WDE highly recommends that this be published along with the methodology for transparency and explanation.

The Wyoming Department of Education (WDE) is offering the two following suggestions for districts to use to ensure that the allocation of state and local funds guarantees that Title I funds are supplemental. (see Methodology Appendix) Districts have a choice to offer an alternative method to either of these options, however, prior to implementation, it must be approved by the WDE.

In addition to the comparability calculation, Districts must now submit their supplement not supplant calculations as well. Allocation methodologies need to be submitted to the Title I program consultant by December 1, 2017. These methodologies need to be reflective of what was done for the 17-18 school year.

The WDE is allowing districts to apply the following exceptions:

1. Exclude any school with a total enrollment of 100 students or less.
2. Conduct the allocation procedure on a grade span basis, (e.g., High School, Middle School, Elementary)

Exclusions:

Statutorily (ESEA section 1118) the following exclusions apply to any approved methodology the district chooses to use:

- 1) Districtwide activities (e.g., data analysis that is conducted for schools at the district level, district administration, curriculum development, etc.)
- 2) Summer school programs at a specific school that serve students from across the district.
- 3) Preschool programs at a specific school that serve students from across the district.

Please note that while the SEA cannot check to see if individual expenses are supplemental, it is still the responsibility of the SEA to ensure that expenses are allowable under federal rules and regulations.

Methodology Appendix

Methodology 1

Per-Pupil Allocations for State and Local Funds

A district can distribute state and local funds to its schools according to a consistent district wide per-pupil formula, such that:

- 1) Students with characteristics associated with educational disadvantage, including students living in poverty, English learners, students with disabilities, and other groups the district determines are associated with educational disadvantage, generating additional funding for their school.
- 2) Each Title I school receives, for its use, all of the funds to which it is entitled under the formula for allocating state and local funds. (See Table 1)
- 3) The per-pupil allocations are not limited to instructional funding for the school but rather the total per-pupil allocations at the district level.

Table 1

	School A	School B
Total Number of students	500	375
Per Pupil Allocation (State and Local Funds)	\$5000	\$5000
Total Base Per Pupil Funding	\$2,500,000	\$1,875,000
Number of Students in an educationally disadvantaged subgroup	80	100
Additional per pupil funding for educationally disadvantaged students.	\$500	\$500
Total Additional Funding for Educationally Disadvantaged Students	\$40,000 (80 students x \$500)	\$50,000 (100x\$500)
Total	\$2,540,000 (Sum of the bolded cells above)	\$1,925,000 (Sum of the bolded cells above)

School A receives \$2.5 million in funding based on the per pupil allocation of \$5000 per student, with 500 students. The school receives an additional \$40,000 in supplemental funding from state and local funds for the 80 educationally disadvantaged students, which brings the total to \$2,540,000.

School B receives \$1,875,000 in per pupil allocations, plus an additional \$50,000 from state and local funds for educationally disadvantaged students. This brings the total to \$1,925,000.

Methodology 2

Distribution of State and local funds based on personnel and non-personnel resources

A district distributes state and local funds to its schools based on a consistent district wide personnel and non-personnel resource formula such that each Title I school receives an amount of actual state and local funds at least equivalent to the sum of:

- 1) The average district wide salary for each category of school personnel (e.g., personnel salary schedules published by the district), multiplied by the number of school personnel in each category assigned by the district wide formula to the school; and
- 2) The average district wide per-pupil expenditure for non-personnel resources, multiplied by the number of students in the school.

Table 2

Average District Salary for teachers	\$60,000	
Average Non Personnel Per Pupil Expenditure	\$5,000	
	School A	School B
Enrollment	500	375
Staff	12	9
Average Salary x Number of Teachers	12x60000 = 720000	9x60000=540000
Average Non Personnel Expenditures x Enrollment	\$2,500,000	\$1,875,000
Total	\$3,220,000	\$2,415,000

The average district teacher salary is \$60,000, this is, at both schools, multiplied by the enrollment for each school (this is repeated for each category of positions throughout the district), the total for school A is \$30,000,000. The \$30 million is then added to the \$2.5 million which is the average district per pupil expenditure (from the prior year) times the enrollment (500x5000), to generate a total school allocation of \$32,500,000.

Methodology 3 (Beginning School Year 2018-2019)

Provided that there is no more than a 5% variance in per pupil expenditures for state and local funds between Title and Non Title I schools, the required per pupil expenditure reporting under ESEA 1111(h)(1)(C)(x) as amended can be utilized to demonstrate compliance with the Supplement Not Supplant provisions of Title I under ESSA.

Regardless of which methodology is selected, the state and local per pupil expenditures will be monitored annually to ensure compliance with the provided allocation methodologies.

This methodology is not available until the 2018-2019 school year.

Methodology 4

Any locally developed methodology will first be reviewed by the School Finance Data Advisory Committee, which will recommend to the WDE whether or not to approve the methodology. The WDE will then consider the recommendation and communicate to the district regarding the proposed methodology.