



Wyoming Department of Education

IDEA Excess Cost Manual

Table of Contents

Purpose and Authority	
Excess Cost Requirements	
WDE Excess Cost Calculation Process	
Excess Cost Report	
Preparation of the Report	3
Excess Cost Compliance and Verification Process	3
Excess Reporting, Review, and Monitoring	
Timeline and Due Dates	6
Appendices	7
Appendix A: IDEA Excess Cost Verification – Explanation of Calculations	7
Appendix B: IDEA Excess Cost Verification	11

Purpose and Authority

Individuals with Disabilities Education Act (IDEA) Part B funds two federal grants to states to help local educational agencies (LEAs) provide a free appropriate public education (FAPE) to students with disabilities:

- the Grants to States for Education of Children with Disabilities program (authorized under Section 611 of IDEA) to support students with disabilities ages 3 to 21
- the Preschool Grants for Children with Disabilities program (authorized under Section 619 of IDEA) to support students with disabilities ages 3 to 5

State educational agencies (SEAs) allocate subgrants of both Section 611 and Section 619 funds to LEAs. LEAs may only use IDEA Part B Section 611 and Section 619 funds to pay for the excess cost of providing special education and related services to eligible students with disabilities. IDEA Part B funds may only be used to support "excess costs," which are the costs above and beyond what an LEA spends on average to educate an elementary or secondary school student.

Students with disabilities may require extra supports and services that generate additional costs for LEAs. IDEA requires, at 34 CFR §§ 300.16 and 300.202(b) and at Appendix A to Part 300, that an LEA use its IDEA funds for costs of special education and related services that are in excess of the costs for all students. This ensures that the LEA spends at least as much on children with disabilities as on children without disabilities before using IDEA funds. IDEA is meant to help supplement these additional costs, not the entire cost of educating a student with a disability. In order to meet the excess cost requirement, districts must spend, from state and local funds, the average annual per pupil expenditure (APPE) amount on a child with disabilities before accessing Part B funds. 34 CFR § 300.16 requires LEA to compute the APPE at both the elementary and secondary levels. An LEA meets the excess cost requirement if it has spent a minimum amount of non-IDEA dollars for the education of children with disabilities. Compliance with the excess cost requirement is evaluated by looking at LEAs' aggregate spending for elementary and secondary students in a given school year rather than looking at any particular cost to determine if it is a "general cost" or an "excess cost." The Wyoming Department of Education (WDE) examines how much on average, each LEA spent per student in the last school year. This amount consists of all non-IDEA funds. LEAs must have a separate calculation for the per student amount for elementary school students and the per student amount for secondary school students.

While the excess cost requirement has been a part of IDEA since 1975, new guidelines for determining whether school districts have met the excess cost requirement were published in Appendix A to 34 CFR § 300 in 2006. Each district is responsible for calculating their excess costs annually.

Excess Cost Requirements

Under IDEA <u>34 CFR §300.16</u>, excess costs mean those costs that are in excess of the average annual per-pupil (APPE) expenditure in an LEA during the preceding school year for an elementary school or secondary school student, as may be appropriate, and that must be computed after deducting--

- (a) Amounts received -
 - (1) Under Part B of the Act;
 - (2) Under Part A of Title I of the ESEA; and
 - (3) Under Parts A and B of Title III of the ESEA and;
- (b) Any State or local funds expended for programs that would qualify for assistance under any of the parts described in paragraph (a) of this section, but excluding any amounts for capital outlay or debt service.

IDEA Part B regulations in <u>Appendix A</u> provide an example of the calculation process that the WDE is required to follow when determining the threshold amount for elementary and secondary schools.

WDE Excess Cost Calculation Process

Excess Cost Report

The excess calculation is completed by the WDE on behalf of LEAs. The WDE School Foundation Consultant calculates excess costs each year in December using a very specific methodology with data collected from LEAs. The report is prepared using data from the most recent year for which information is available. The WDE uses data from 2 prior fiscal years (i.e., for the FY 2023–24 application, excess cost data are for FY 2021–22) extracted from the following reports:

- WDE600 WISE Attendance and Membership collection
- WDE601 WISE Annual District Report collection
- WDE684 WISE Teacher/Course/Student collections

This report verifies that districts met the requirement for IDEA excess costs.

Preparation of the Report

The WDE School Foundation Consultant sets up a new folder for IDEA Excess Costs on the F: drive (WDE School Foundation/SPED/IDEA Excess Costs) for the appropriate fiscal year (FY) (20XX–XX IDEA Excess Costs). Data are generated on the SQL Collections ODS database.

When the report is completed, the WDE School Foundation Consultant:

- saves a copy of the completed file and any supporting documents in the WDE School Foundation/SPED/IDEA Excess Costs folder.
- verifies the calculations each year to make sure the correct student counts and location codes are in the appropriate totals.
- runs the procedure to update the data in another database.

District-specific IDEA Part B - Excess Cost Verification Reports are available for LEAs to review/download. LEAs are encouraged to share the report with the appropriate special education programs administrative staff for their input and review, if necessary, before certifying the report.

Excess Cost Compliance and Verification Process

LEAs are instructed to review their Excess Cost Verification Reports for accuracy and complete an acknowledgment that certifies the data are correct. The LEA uses their WyEd credentials to access the report link. A copy of the report should be retained with the appropriate IDEA Part B grant application as well as for a single audit purpose at the LEA level.

The report includes

- the threshold amount that the LEA is required to spend for the education of students with disabilities using non-IDEA dollars and
- the non-IDEA expenditures identified by the WDE as attributable to the education of students with disabilities that can be counted for the excess compliance test.

If an LEA does not agree, they contact the WDE School Foundation Consultants to make revisions.

The process is outlined below:

Step 1: LEAs verify the excess cost calculations each year in December to ensure that the correct student counts and location codes are in the appropriate categories. These categories include both special education and general education expenditures. For general education expenditures, the participation of students in the classroom is used to determine the proportion allocated for special education.

Step 2: Email notifications are sent to districts to begin the verification process with the IDEA Excess Cost Verification – Explanation of Calculations (see Appendix A). In the correspondence, LEAs are instructed to acknowledge the review of their Excess Cost Verification Reports for accuracy and completeness.

Step 3: LEA-specific IDEA Part B - Excess Cost Verification Reports are available to review/download via a link. The WDE suggests that districts share the report with the appropriate special education programs administrative staff for their input and review if necessary. This verification and acknowledgment should take approximately 2 weeks to complete.

Excess Reporting, Review, and Monitoring

The Excess Cost Verification form of the most recent year for which expenditure data are available will be sent via email and must be certified by the LEA and submitted to the WDE as part of the IDEA Part B Grant Application packet for the upcoming fiscal year. (i.e., excess cost data of FY 2021–22 must be submitted as part of the application packet for FY 2023–24).

A report comprising information must be submitted by the LEA on the following data reporting forms: WDE401, WDE601, WDE608, and WDE684. WDE601 expenditure data include 01, 20, 30, 40, and 50 fund groups. Expenditure data are categorized based on WDE601 target IDs and school configurations. Alternative configurations (K–8, K–9, K–12, etc.) are included in the district-level reporting and are allocated based on grade enrollment figures. Worksheets must be reviewed with an acknowledgment to the WDE and retained with documentation of the appropriate IDEA Part B application.

There are three consultants on the WDE School Foundation team who monitor excess costs each year; however, there is one consultant assigned to calculate excess cost. Once the designated consultant calculates the excess cost, LEAs must review the report for accuracy and

then acknowledge that they agree to the document as described in the previous section. If districts do not agree, they may contact the WDE School Foundation Consultants to make revisions.

Since the methodology for calculating excess costs is very specific and can be calculated from data collected from LEAs, the WDE has developed a process to calculate and certify excess costs for LEAs as described below.

- 1. For the fiscal year that ends on June 30, LEAs' expenditures reports (WDE401, WDE601, WDE608, and WDE684) are due to the WDE by August 12.
- 2. Data validation begins after documentation is submitted and is finalized in October.
- 3. After the process is complete, the WDE School Foundation Consultant finalizes the excess cost reports in December.

The report includes an excess cost calculation threshold and non-IDEA expenditures attributable to the education of students with disabilities. The two numbers are compared to determine whether the LEA has met the excess compliance test for the year.

Timeline and Due Dates

Table 1. Excess Cost Timeline

Activity	Date	Responsible Staff
LEA Expenditures Report Submission	August 12	LEA staff
Student Enrollment Data (3x a year)	Jan., July, Dec.	LEA staff
Excess Cost data validation	October	School Foundation Consultant/Senior Fiscal Analyst
Excess Cost Verification Report	December	School Foundation Consultant
LEA Certified Excess Cost Report	July 1	LEA staff
Review of LEA Certified Excess Cost Report with supporting documentation	September 30	Senior Fiscal Analyst

Appendices

Appendix A: IDEA Excess Cost Verification – Explanation of Calculations

All expenditures and enrollment data used for the excess cost calculations must be from the same fiscal year.

A. Student Data: Elementary & Secondary

- <u>Total enrollment</u> = Total Enrollment reported on the October snapshot for the prior year
 (PY)
- <u>Percentage</u> = Percentage of Elementary and Secondary Enrollment to Total Enrollment

Note. The number of students for the elementary count and the secondary count are determined based upon the grade configuration of their respective schools. Typically, elementary is grades K-5 and secondary is grades 6-12.

Count of Special Education Students = from October snapshot of PY

B. Expenditures (PY WDE601)

• <u>Total Operating Costs</u>. Function level expenditures from fund groups 01, 20, 30, 40, and 50 grouped by location code.

Note. District-level expenditures are summarized by major function code, 1xxx, 2xxx, 3xxx, etc., and their sums are included on the "Total Operating Costs" line of the report. District amounts are allocated to elementary and secondary based on enrollment from Section A on the "Allocated Expenditures" line.

- <u>Less Capital Outlay and Debt Service.</u> Items included on this line are expenditures coded to the following:
 - 3470 Major Building and Facility Maintenance Capital Outlay (5xx objects)
 (listed in blue)
 - 5xxx Facilities and Acquisition Services (listed in blue)
 - o 6xxx Debt Service and Fund Transfers (listed in blue)
- Net Operating Costs = [Total Operating Costs] [Capital Outlay and Debt Service]
- <u>Allocated Expenditures</u> = District amounts included on the "Net Operating Costs" line are allocated to elementary and secondary based on enrollment from Section A.
- <u>Total Adjusted Expenditures</u> = [Net Operating Costs] + [Allocated Expenditures]

Note. This line includes expenditures allocated to or reported as elementary and secondary expenditures.

- **c. Federal and State Deductions** PY amounts listed in this section represent federal and state expenditures for special education that are excluded from the calculation of excess cost per the Office of Special Education (OSEP) and IDEA Guidelines.
 - <u>Title VI Part B Expenditures</u> = Total expenditures coded to Title VI Part B project codes
 - <u>ESEA Title I Part A Expenditures</u> = Total expenditures coded to Title I Part A project codes
 - <u>ESEA Title III Parts A and B Expenditures</u> = Total expenditures coded to Title III A or B project codes
 - <u>PY State and Local Funds Spent for Children With Disabilities</u> = WDE401 reported expenditures
 - Total Federal and State Deductions = Subtotal of expenditures by respective columns

Note. The district expenditures are allocated to elementary and secondary based on enrollment from Section A.

- <u>Allocated Deductions</u> = Total Federal and State Deductions amount from respective columns (Elementary and Secondary) + Total Federal and State Deductions amount at the district level allocated by ratio of total enrollment
- **D. Minimum Spending Calculations** This section represents the minimum amount the district must spend for elementary and secondary special education students using non-IDEA funds.
 - Total Deductions = Allocated Deductions from section C
 - Net Expenditures = [Total Adjusted Expenditures] [Allocated Deductions]
 - <u>Enrollment</u> = Enrollment numbers from Section A
 - Adjusted Per Pupil Expenditures = [Net Expenditures] / [Enrollment]
 - Prior Year Number of Students With Disabilities = PY Special Education October Count
 - <u>Total Minimum LEA Must Spend Before Accessing Part B Funds</u> = [Prior Year Number of Students With Disabilities] * [Adjusted Per Pupil Expenditures]
- **E. PY Cost of General Education Services for Section F below*** This section represents the approximate costs for general education services provided to special education students. These amounts are included in the Excess Cost Determination Section below. *Note: Only represents students reported with RE, RR, and SC student environment codes
 - <u>Count of Students Spending 80–100% of Day in General Education Classroom</u> = from PY October snapshot
 - Approx. General Ed FTE of Students Spending 80–100% of Day in General Education
 Classroom = [above enrollment] *90%

- <u>Count of Students Spending 40–80% of Day in General Education Classroom</u> = from PY October snapshot
- Approx. General Ed FTE of Students Spending 40–80% of Day in General Education
 Classroom = [above enrollment] *60%
- <u>Count of Students Spending 00–40% of Day in General Education Classroom</u> = from PY October snapshot
- Approx. General Ed FTE of Students Spending 00–40% of Day in General Education Classroom = [above enrollment] *20%
- <u>Total General Education FTE of IEP Students</u> = Subtotal of adjusted three enrollments above
- Approx. Costs of General Education Services for IEP Students = [Adjusted Per Pupil Expenditure – advanced 1 year]

Note. To obtain the per pupil amount applied to the FTE of IEP students in the general classroom, you will need to advance the report 1 year. The "Adjusted Per Pupil Expenditure" amount for both elementary and secondary is listed at the bottom of the second page of the advanced report.

- **F.** Excess Cost Determination This section determines eligibility for federal IDEA funding by comparing PY minimum spending requirements to PY spending data.
 - <u>PY State and Local Funds Spent for Children With Disabilities</u> = PY WDE401 reported expenditures
 - <u>Allocated WDE401 Expenditures</u> = [PY State and Local Funds Spent for Children With Disabilities] / [PY Total Enrollment] * [Elementary or Secondary, respectively, number of students]
 - PY Approx. Costs of General Education Services for IEP Students = Section E
 - <u>ESEA Title I Part A Expenditures</u> = PY Total expenditures coded to Title I Part A project codes
 - <u>ESEA Title III Parts A and B Expenditures</u> = PY Total expenditures coded to Title III A or B project code
 - PY Expenditures for Students With Disabilities = Total of Section F expenditures
 - <u>Minimum Expenditures From PY Calculation</u> = [Total Minimum LEA Must Spend Before Accessing Part B Funds] (From Section D)
 - <u>Determination</u> = If "Minimum Expenditures From PY Calculation" is less than or equal to "PY Expenditures for Students With Disabilities," <u>DISTRICT MET EXCESS COST REQUIREMENT</u>.

WDE IDEA Excess Cost Manual

Once all districts have completed their verification, send a copy of the District Summary Report listing all the districts to the Senior Fiscal Analyst of the WDE. A copy of this report should also be kept in the current folder for reference.

Appendix B: IDEA Excess Cost Verification

Wyoming Department of Education 122 W. 25th Street, Suite E200 Cheyenne, WY 82002 Contact: Special Programs Division

IDEA Part B Excess Cost Verification

District ID:	XXXXXXXX
District Name:	xxxxxx #xx
Excess Cost Application Year:	20xx-xx
Excess Cost Data PFY:	20xx-xx

- 1. In accordance with CFR §300.16 amounts provided to districts under IDEA Part B may be used only to pay the excess costs of providing special education and related services to children with disabilities.
- 2. In order to meet the excess cost requirement, districts must spend the average annual per student amount on students with disabilities with state and local funds before accessing Part B funds (CFR §300.16).
- 3. CFR §300.16 requires districts to compute the minimum average amount separately for children with disabilities in its elementary schools and for children with disabilities in its secondary schools.
- 4. This report is comprised of information submitted by the district on the following data reporting forms: WDE401, WDE608, WDE601 and WDE684.
- 5. WDE601 expenditure data include 01, 20, 30, 40, and 50 fund groups.
- 6. Expenditure data are categorized based on WDE601 target IDs and school configurations. Alternative configurations (K-8, K-9, K-12, etc.) included in the district-level reporting are allocated based on grade enrollment figures.
- 7. The worksheet must be reviewed with an acknowledgement to the WDE and retained with documentation of the appropriate Title VI Part B application.
- 8. For questions regarding the calculations below, contact Trystin Green at trystin.green@wyo.gov or 307-777-6206.
- 9. All data used for calculation and compliance are from the prior fiscal year (i.e., for application year 2023/24, data are for FY 2021/22)

A) PY Student Data	District	Elementary	Secondary
Total 20xx-xx Enrollment (WDE684)		0	0
Percentage of Elementary and Secondary Enrollment to Total	0.00 %	0.00 %	0.00%
Enrollment Count of Special Education Students From the 20xx-xx	0	0	0
B) PY Expenditures (FY20xx-xx WDE601)	District	Elementary	Secondary
1105 - Preschool Instruction		0	
1110 - Elementary		0	0
1120 - Junior High or Middle Schools			0
1130 - Secondary			0
1210 - Programs for Students With Disabilities		0	0
1233 - Gifted and Talented		0	
1290 - Other Special Programs		0	
1410 - Student Activities - Elementary		0	
1420 - Student Activities - Jr Hi / Middle School			0
1430 - Student Activities - High School			0
1530 - Vocational Instruction, High School			0
1xxx - All Remaining Functions	0		
2110 - Guidance Services		0	0
2120 - Attendance and Social Work Services		0	0
2130 - Health Services		0	0
2150 - Speech Pathology and Audiology Services		0	0
2190 - Other Support Services-Student		0	0
2210 - Improvement of Instruction Services		0	
2213 - Staff Development Services		0	0
2215 - Instructional Facilitators		0	0
2220 - Educational Media Services		0	0
2xxx - All Remaining Functions	0		
3320 - School Administration		0	0
3331 - Fiscal Services		0	
3420 - Operating Buildings Services		0	0
3470 - Capital Maintenance		0	0
3490 - Other Operation and Maintenance of Plant Services			0

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Revised: January 2023

B) PY Expenditures (FY20xx-xx WDE601)	District	Elementary	Secondary
3850 - Technology Coordination		0	
3900 - Other Support Services		0	
3xxx - All Remaining Functions	0		
4xxx - All Remaining Functions	0		
5300 - Architecture and Engineering Services		0	
5900 - Other Facilities Acquisition and Construction Services		0	
5xxx - All Remaining Functions	0		
6xxx - All Remaining Functions	0		
Total Operating Costs	0	0	0
Less Capital Outlay and Debt Service	0	0	0
Net Operating Costs	0	0	0
Allocated Expenditures		0	0
Total Adjusted Expenditures		\$0	\$0
C) Federal and State Deductions (PY Expenditures)	District	Elementary	Secondary
Title VI Part B Expenditures	0	0	C
ESEA Title I Part A Expenditures	0	0	C
ESEA Title III Parts A and B Expenditures	0	0	C
PY State and Local Funds Spent for Children With Disabilities (WDE401)	0		
Total Federal and State Deductions	0	0	C
Allocated Deductions		\$0	\$0
D) Minimum Spending Calculations	District	Elementary	Secondary
Total Deductions		\$0	\$0
Net Expenditures		\$0	\$0
Enrollment	0	0	0
Adjusted Per Pupil Expenditures		\$0	\$0
Prior Year Number of Students With Disabilities (FY20xx-xx) Total	0	0	C
Minimum LEA Must Spend Before Accessing Part B Funds	\$0	\$0	\$0
E) PY Cost of General Education Services for Section F) below*		Elementary	Secondary
Count of Students Spending 80-100% of Day in General Education Classroom	ĺ	0	C
Approx. General Education FTE of Students Spending 80-100% of Day in General Education C	lassroom	0.00	0.00
Count of Students Spending 40-80% of Day in General Education Classroom	ţ	0	(
Approx. General Education FTE of Students Spending 40-80% of Day in General Education Cla	ssroom	0.00	0.00
Count of Students Spending 0-40% of Day in General Education Classroom	Ţ	0	(
Approx. General Education FTE of Students Spending 0-40% of Day in General Education Clas	sroom	0.00	0.00
Total Company Education ETE of IED Children	F	0.00	0.00

^{*} Note: Only represents students reported with RE, RR, and SC student environment codes for FY2020-21

F) Excess Cost Determination (PY Expenditures)	District	Elementary	Secondary
Prior Year State and Local Funds Spent for Children With Disabilities	0		
(WDE401)		0	0
	0	0	0
Allocated 401 Expenditures	0	0	0
PY Approx. Costs of General Education Services for IEP Students FY20xx-xx	0	0	0
ESEA Title I Part A Expenditures	\$0	\$0	\$0
ESEA Title III Parts A and B Expenditures	0	0	0

PY Expenditures for Students With Disabilities

Total General Education FTE of IEP Students

Approx. Costs of General Education Services for IEP Students

Minimum Expenditures From PY Calculation (FY20xx-xx)

Page 2 of 3

0.00

0.00

Determination

Reviewed By

District Met Excess Cost Requirement	District Met Excess Cost Requirement

Date



