



Technical Assistance Tour





Illinois State Board of Education

- **Vision**

- Illinois is a state of whole, healthy children nested in whole, healthy systems supporting communities wherein all people are socially and economically secure.

- **Mission**

- Provide leadership and resources to achieve excellence across all Illinois districts by engaging legislators, school administrators, teachers, students, parents, families, and other stakeholders in formulating and advocating for policies that enhance education, empower districts, and ensure equitable outcomes for all students.



Illinois State Board of Education

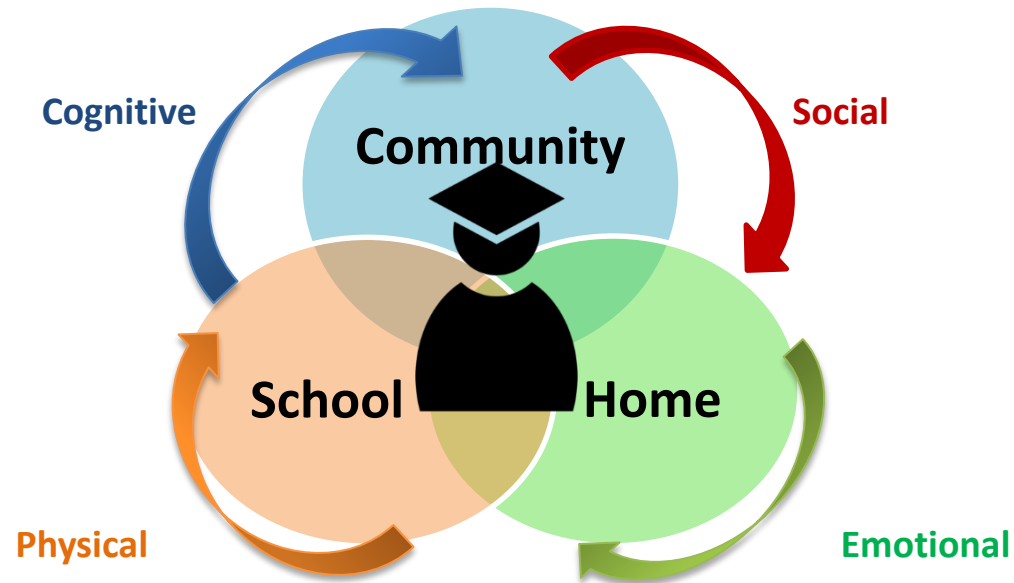
Goals

- *Every child in each public school system in the State of Illinois deserves to attend a system wherein...*
 - All kindergartners are assessed for readiness.
 - Ninety percent or more of third-grade students are reading at or above grade level.
 - Ninety percent or more of fifth-grade students meet or exceed expectations in mathematics.
 - Ninety percent or more of ninth-grade students are on track to graduate with their cohort.
 - Ninety percent or more of students graduate from high school ready for college and career.
 - All students are supported by highly prepared and effective teachers and school leaders.
 - Every school offers a safe and healthy learning environment for all students.



The Whole Child

A child within an ecology of multiple and interconnected parts
nested in overlapping systems





Supplement not Supplant (SNS)



Sequence of Learning

- SNS Old vs. New
- Supplement not supplant (SNS)
 - SNS Exception
 - Title I Neutral
 - SNS Special Rule
 - SNS Compliance
 - Resource Allocation Method (RAM)
 - RAM Philosophy
 - RAM School Expenditures
 - Methodology Samples
 - RAM Examples and Assumptions
 - LEA Key Flexibilities



SNS Old vs. New



SNS Old

No Child Left Behind (NCLB)

- Focused on actual allocations and required LEAs to prove how any individual allocation was supplemental instead of supplanting
- Encouraged consistent spending preferences or expenditure habits that remained the same year after year.
 - Preference could change if the lack of funding caused a detriment to the program, i.e., program closure. For example, if the LEA utilized local funds to implement services, the LEA funded continuous services with the same funding stream.
- If the funding stream changed from year to year, this was supplanting and non-allowable unless the lack of funding would cause program or service to cease.



SNS New

Every Student Succeeds Act (ESSA)

- Focus is on allocation methodologies
 - LEA articulate what they are doing and how they are spending by showing their spending rationale.
- Encourages equitable and neutral spending preferences through Title I-neutral spending.
- Covers all State and local funding that an LEA receives in order to equitably educate students and provide allocation to schools.
- Ensures that Illinois' Title I schools receive all the State and local funding that they would in the absence of Title I.



Supplement, Not Supplant (SNS)

- The ESEA requires a State educational agency (SEA) or local educational agency (LEA) to use Title I funds only to supplement the funds that would, in the absence of such Title I funds, be made available from State and local sources for the education of students participating in Title I programs, and not to supplant such funds.

ESEA section 1118(b)(1)



SNS Exception

An LEA **does not** have to demonstrate compliance under ESEA section 1118(b)(2) if it is has:

- Only one school.
- All Title I schools.
- A grade span with a single school or all Title schools
 - i.e., no methodology is required for this grade span.



“Title I Neutral”

- Provide each Title I school the State and local funds it would receive were it not a Title I School
- Ensures that State and local funds to a Title I school are not reduced based on the school receiving Title I, Part A funds.



SNS Special Rule

- No LEA shall be required to:
 - Identify an individual cost or service, if supplemental
 - Provide Title I services through a particular instructional method or setting in order to demonstrate compliance
 - LEAs are not required to state, for example type of instructional methods, lectures, case studies in a particular setting, i.e. classroom, online, etc.

ESEA section 1118(b)(3)



SNS Compliance

- The LEA shall demonstrate the methodology used.
- To ensure Title I schools receive all of the State and local funds it would otherwise receive if it were not receiving Title I assistance.
 - Title I school neutrally



Resource Allocation Methodology (RAM)

- The LEA methodology:
 - Must allocate State and local funds to schools in a Title I neutral manner;
 - Provide each Title I school the State and local funds it would receive were it not a Title I School, i.e., treat Title I schools neutrally.
 - An LEA may have a single methodology or multiple methodologies
 - A different methodology for each grade span.



RAM Philosophy

Assists in demonstrating Title I neutrality:

- Allows the LEA to allocate State and local funds distributed and
- Determine the supplemental costs, i.e., allowing more funding to Title schools than to non-Title I schools.
- LEA flexibility in adopting or using an existing RAM to meet the new SNS requirement.



RAM School Expenditures

- Examples of school expenditures that directly affect instructional practices:
 - Teachers & Paraprofessionals
 - Salary, Benefits, Supplements
 - Instructional Materials
 - Supplies, Technology, Textbooks
 - School Administration
 - Principals and School Other Administration
 - School Counselors
 - Librarians
 - Professional Development



RAM School Expenditures

- Examples of Expenditures to Exclude
 - Debt Service
 - Capital Expenditures
 - Insurance
 - Food Service
 - Maintenance
 - Utilities
 - Transportation
 - Athletic/Extracurricular
 - Districtwide Activities (ex. district administration, curriculum development)
 - Summer School Programs (that serve students across the district)



Methodology Samples

- Weighted Per Pupil Formula
 - Based on characteristics of students (ex. Poverty, ELLs)
- Distribution Based on Personnel and Non-Personnel Resources
 - Average districtwide salary for each category of school personnel
 - Multiplied by the number of school personnel



RAM Example #1

Student characteristics: Weighted student funding

- An LEA allocates State and local funds:
 - Through a standard formula to allocate dollars based on student characteristics.
 - Without regard for whether a school receives Title I funds.



RAM Example #1 Assumption

- Base allocation per student = \$7,000
- Additional allocation per student from a low-income family = \$250
- Additional allocation per English learner = \$500
- Additional allocation per student with a disability = \$1,500
- Additional allocation per preschool student - \$8,500



RAM Example #1

In a school of 450 students, including 250 students from low - income families, 100 English Learners, 50 students with disabilities, and 20 preschool students, the school would be expected to receive \$3,507,500,000 in non-Federal resources

Category	Calculation	Result
Allocation per student	450 students x \$7,000	\$3,150,000
Allocation per student from low – income family	250 students from low – income families x \$250	\$62,500
Allocation per English learner	100 English learners x \$500	\$50,000
Allocation per student with a disability	50 children with a disability x \$1,500	\$75,000
Allocation per preschool student	20 preschool students x \$8,500	\$170,000
Total State and local funds allocated to school		\$3,507,500



RAM Example #2

Staff salaries and supplies

- An LEA allocates State and local funds
 - Based on average costs of staffing and supplies
 - Without regard for whether a school receives Title I funds.



RAM Example #2 Assumption

- Using the average district wide salary for each category of school personnel (district salary schedules)
 - 1 principal/school (\$120,000)
 - 1 librarian/school (\$65,000)
 - 2 guidance counselors/school (\$65,000/guidance counselors)
 - 1 teacher per 20 students (\$65,000/teacher)
- Using the average district wide per-pupil expenditure for non-personnel resources
 - \$825/student for instructional equipment and supplies (including technology)



RAM Example #2

In a school of 500 students, the school would be expected to receive \$2,352,500 in non-Federal resources

Category	Calculation	Result
1 principal	1 principal x \$120,000	\$120,000
1 librarian	1 librarian x \$65,000	\$65,000
2 guidance counselors	2 guidance counselors x \$65,000	\$130,000
25 teachers	25 teachers x 65,000	\$1,625,000
Equipment and supplies	500 students x \$825	\$412,500
Total State and local funds allocated to school		\$2,352,500



LEA Key Flexibilities

- An LEA may use Title I funds for a particular cost that in the previous year it paid for with local funds because the LEA allocated State and local funds in a Title I-neutral manner.
- An LEA or Title I school may use Title I funds for activities that are required by law as long as the activities are allowable under Title I.
 - There is no longer a requirement to demonstrate that a particular activity is supplemental.
- An LEA need not identify that particular costs supported with Title I, Part A funds are supplemental in order to comply with SNS.
- Even when the SNS requirement is met, an activity must be allowable under Title I before Title I funds may be used for the activity.
- The type of Title I program determines whether a cost is allowable.
- Allowable under Uniform Guidance (2 C.F.R. 200)
 - Reasonable, necessary, allowable, documental, and in compliance with specific cost category



Questions





Resource

Supplement not Supplant under Title I, Part A of the Elementary and Secondary Education Act 1965, as Amended by the Every Student Succeeds Act, Non-regulatory Informational Document,

<https://www2.ed.gov/policy/elsec/leg/essa/snsfinalguidance06192019.pdf>