



Four federal equity provisions and how they intersect

October 21, 2021

Marguerite Roza

Hannah Jarmolowski

Photo is for illustrative purposes only.
Any person depicted in the photo is a model.

Agenda

I. Four equity provisions

II. Using school-by-school spending data and the equity provisions

III. Current regional center resource allocation review work

Four Federal Provisions Advance Within-District Equity

Financial Transparency:
SEAs must publish school-by-school per-pupil spending data

Resource Allocation Reviews:
Leaders review allocation in districts with CSI/TSI schools

Supplement not Supplant:
Districts must articulate a “resource allocation methodology”

ESSA

Producing school-by-school \$ data

Gets leaders looking at \$ allocations

Gets leaders to link \$ to choices

ARP

MoEquity:
District may not reduce per pupil allocations to any of its highest poverty schools.

Creates limits on district \$ reductions

Financial

Transparency:

SEAs must publish school-by-school per-pupil spending data

Producing school-by-school \$ data



Starting June 2020 SEAs must report per-pupil expenditures broken out school on report cards

All states now have some school-by-school data out



National Education Resource Database on Schools

Edunomics Lab assembles the data here

<https://edunomicslab.org/nerds/>

Status: Still work to do!

- Many delays in reporting (10 states have not released 19-20 data).
- Some errors: e.g. figures that are improbably high/low, conflict with F-33 (AZ, CA, IA).
- Many schools missing.
- Other technical issues (OR, OH, GA, NH, NY, UT).

What is the financial transparency requirement?

- T/F School-by-school figures are expenditures, not budget numbers.
- T/F School-by-school figures must use real salaries. (Schools with experienced teachers will show higher spend).
- T/F! Most states already had these figures handy so it was just a matter of hitting “publish.”
- T/F! ESSA requires each district certify their figures.

Many states had to create new accounting processes and train all districts.

ESSA's requirement is for SEAs. It doesn't include any guarantee that districts even look at the #s.

Resource Allocation Reviews (RAR):

Leaders review allocation in districts with CSI/TSI schools

Gets leaders looking at \$ allocations

For districts with a significant number of CSI/TSI schools, SEAs must meet with districts/schools to “periodically review resource allocation” (every 3 years, starting 18-19 school year.)

Note: The conversation is the outcome. (In other words, the conversation needn't produce a set of action/remedy steps.)

Status: Many SEAs are non-compliant or confused.

- In our quick scan, fewer than half of SEAs are doing RARs
- Some mistakenly think RARs only involve federal funds (RAR must review all funds).

“(c)(4)(D)(i): establish a State-determined methodology to identify, beginning with school year 2017–2018, and at least once every three school years thereafter, one statewide category of schools for comprehensive support and improvement”

“periodically review resource allocation to support school improvement in each local educational agency in the State serving— (I) a significant number of schools identified for comprehensive support and improvement under subsection (c)(4)(D)(i); and (II) a significant number of schools implementing targeted support and improvement plans under paragraph (2)”

What is the resource allocation review requirement?

- T/F RARs should have started in 18-19.
- T/F The RAR requires that SEAs and districts examine distribution of state/local funds.
- T/F As part of the RAR, the SEA must document a plan for reallocating resources.
- T/F A conversation between the SEA, LEA, and school leaders about resource allocation and student outcomes would satisfy the RAR requirement.

Supplement not Supplant (SNS):

Districts must articulate a “resource allocation methodology”

Gets leaders to link \$ to choices

Districts must be able to produce an allocation methodology and it must be Title I neutral

What’s a resource allocation methodology??

USED provided examples

Weighted Student Formula example		Staffing formula example
Base allocation per student	\$7,000	1 principal/school
+ per <u>student from a low-income family</u>	\$250	1 librarian/ school
+ per <u>English learner</u>	\$500	2 guidance counselors/school
+ per <u>student with a disability</u>	\$1,500	1 teacher per 20 student
+ per <u>preschool student</u>	\$8,500	\$825/student for materials

Status: SNS

??

When we ask districts, most haven’t heard of this requirement.

ESEA section 1118(b)(2)): To demonstrate compliance with [the supplement not supplant requirement], a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving [Title I, Part A funds] ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving [Title I, Part A funds].

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

Federal Supplement-not-Supplant (SNS) Guidance

- T/F The SNS required “allocation methodology” must describe the allocation of state and local dollars to schools.
- T/F Most districts already articulate an allocation methodology and have their boards approve it as part of the budget process.
- T/F LEAs must post their allocation methodology online
- T/F When asked, school board members can generally articulate their district’s allocation strategy

MoEquity:

District may not reduce per pupil allocations to any of its highest poverty schools.

Creates limits on district \$ reductions

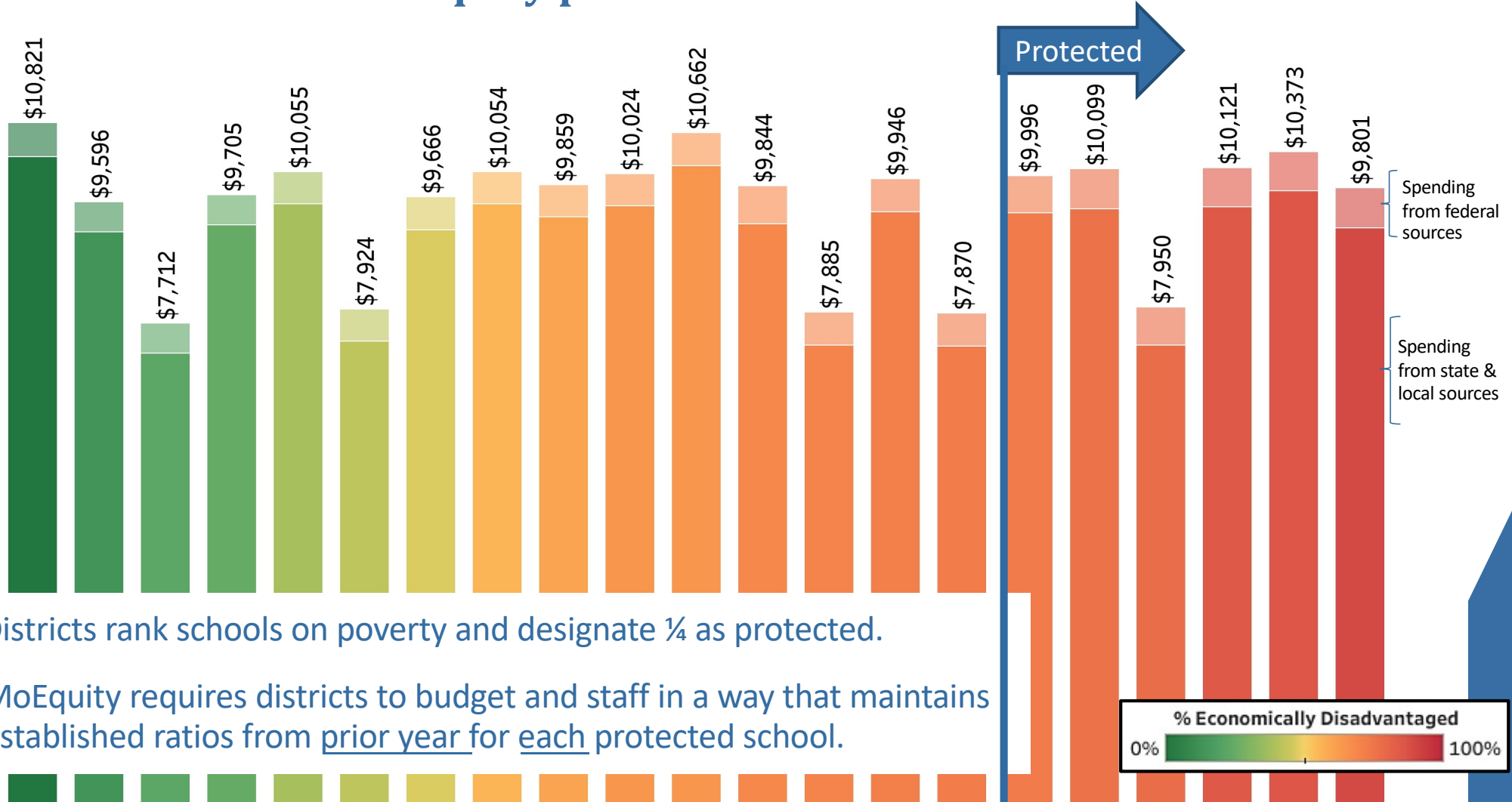
Starting with 21-22, districts may not disproportionately reduce per-pupil state/local dollars or staffing per pupil in their highest-poverty 25% of schools.

- New Proposed Reporting.** SEAs must publish by Dec 2021:
- 1) School-by-school budget financials for 2021-22
 - 2) School-by-school financials (we assume this is expenditures) for 2020-21

Status: Still unfolding

- USED permits **revenue gaining districts** to apply for an exemption for 21-22 and flexibility in enrollment counts.
- USED is asking for feedback on proposed additional collections.

New: Maintenance of Equity places constraints on district allocation



Districts rank schools on poverty and designate ¼ as protected.

MoEquity requires districts to budget and staff in a way that maintains established ratios from prior year for each protected school.



Reminder: Four Federal Equity Provisions for Within-District Equity

Financial Transparency:

SEAs must publish school-by-school per-pupil spending data

Producing school-by-school \$ data

Resource Allocation Reviews:

Leaders review allocation in districts with CSI/TSI schools

Gets leaders looking at \$ allocations

Supplement not Supplant:

Districts must articulate a “resource allocation methodology”

Gets leaders to link \$ to choices

ARP

MoEquity:

District may not reduce per pupil allocations to any of its highest poverty schools.

Creates limits on district \$ reductions

ESSA

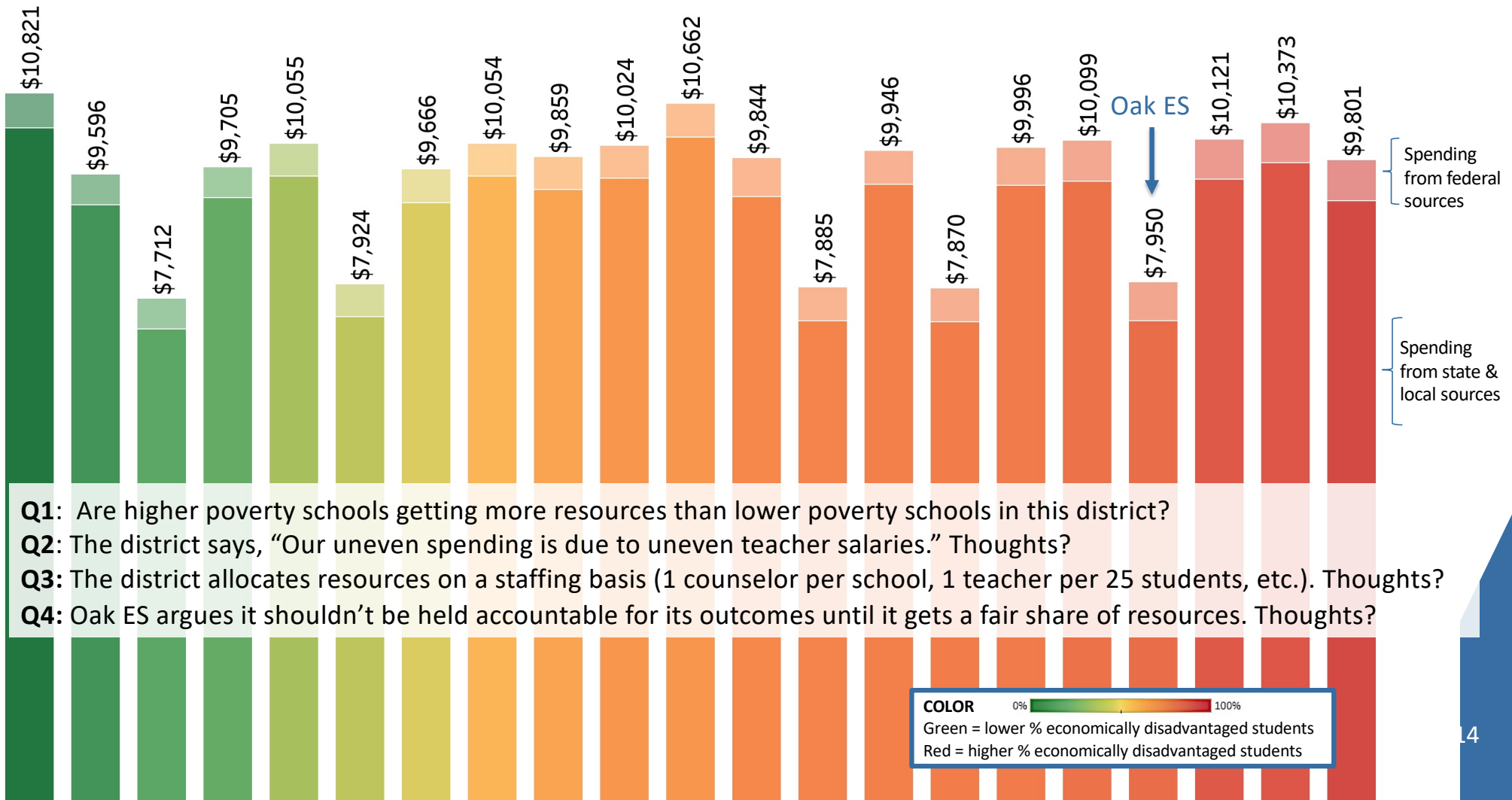
POLL: Which of these equity provisions most excites you?

- » A. Publication of school-by-school per-pupil spending data
- » B. Resource Allocation Reviews
- » C. Supplement not Supplant: Resource allocation methodology
- » D. Maintenance of Equity

POLL: Which of these equity provisions do you think SEAs need the most help with?

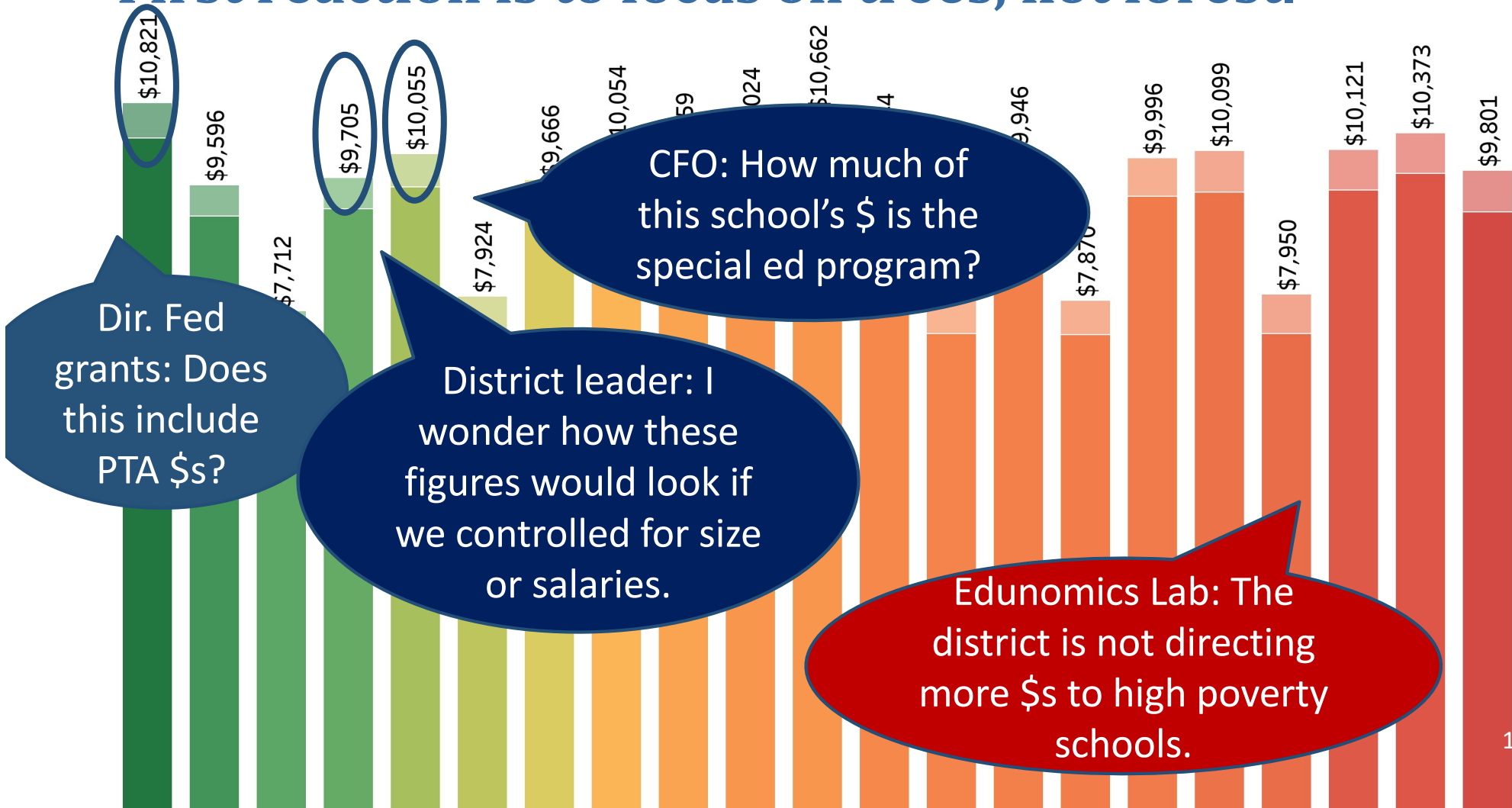
- » A. Publication of school-by-school per-pupil spending data
- » B. Resource Allocation Reviews
- » C. Supplement not Supplant: Resource allocation methodology
- » D. Maintenance of Equity

Per-pupil expenditures for all elementary schools in an Ohio district

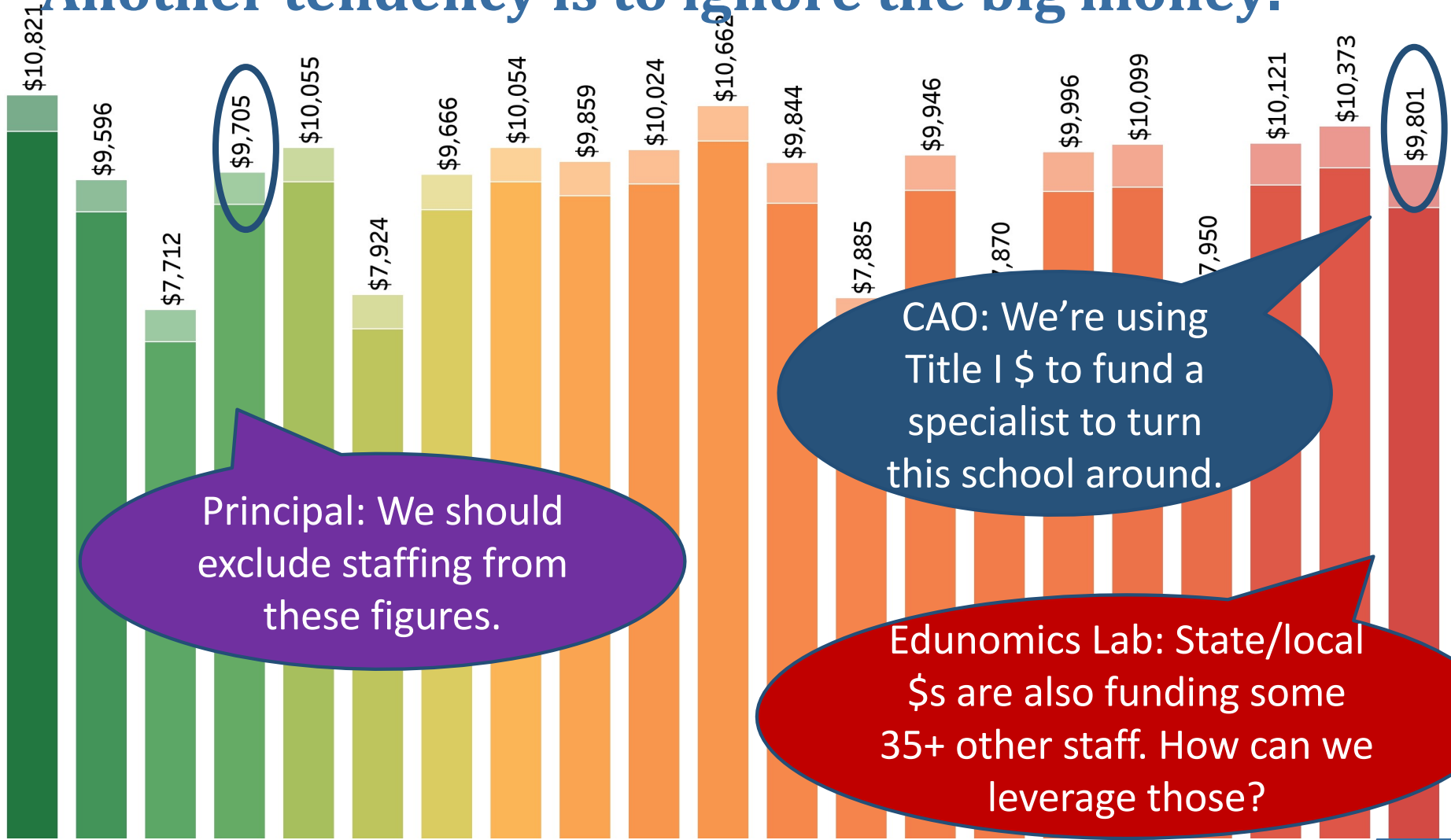


Lessons learned in bringing school-by-school spending data to districts

First reaction is to focus on trees, not forest.



Another tendency is to ignore the big money.

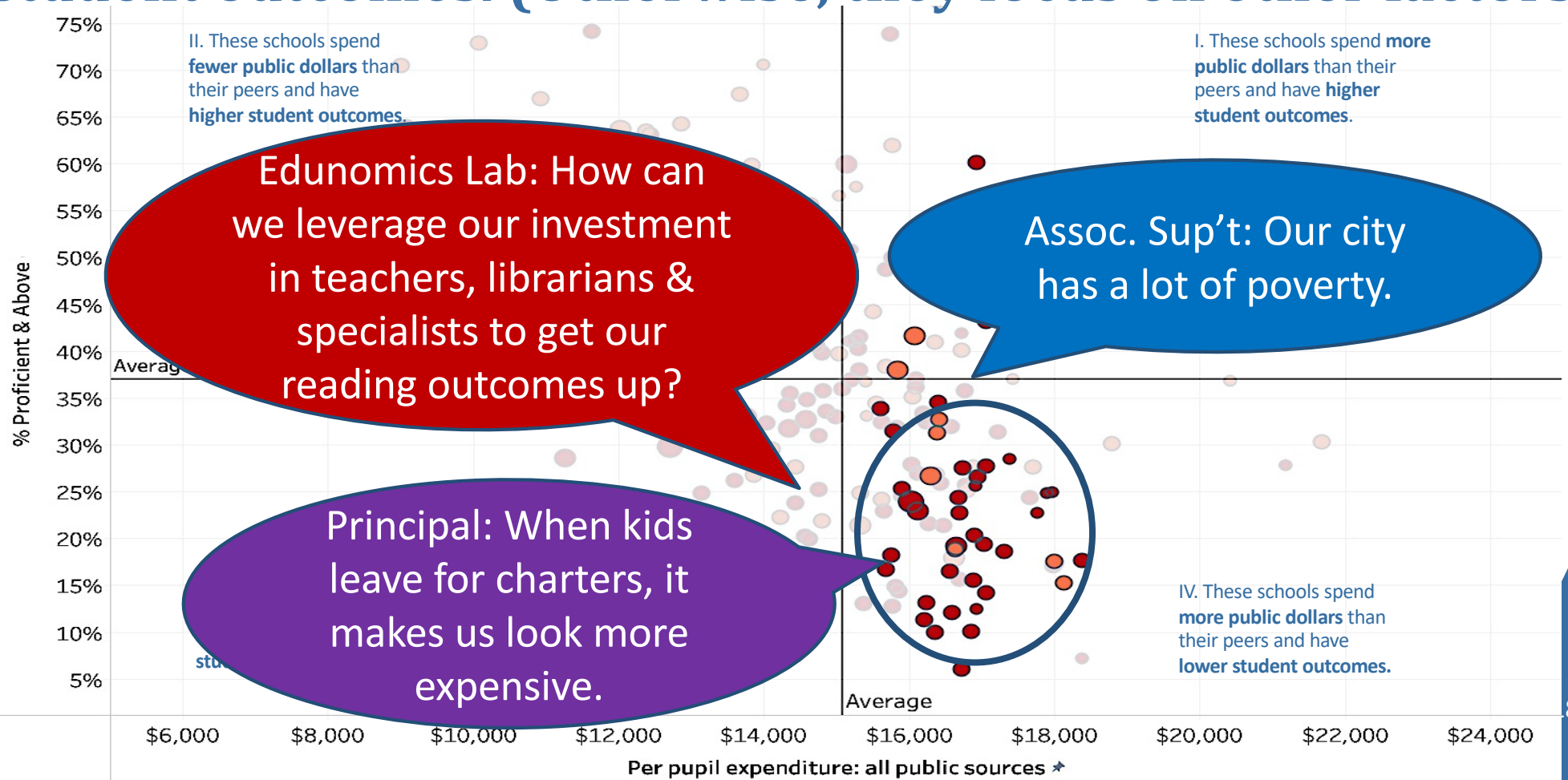


Principal: We should exclude staffing from these figures.

CAO: We're using Title I \$ to fund a specialist to turn this school around.

Ednomics Lab: State/local \$s are also funding some 35+ other staff. How can we leverage those?

Leaders need nudging to engage on leveraging dollars for student outcomes. (Otherwise, they focus on other factors.)



POLL: What is the biggest barrier to getting district/school leaders to engage with these data?

- » A. Lack of good data displays
- » B. Lack of finance/data analytics experts to facilitate the conversation
- » C. Competing priorities (or “it’s nobody’s job”)
- » D. Poor training/capacity among district/school leaders
- » E. Other - tell us in the chat!


POLL: Have you ever used school-by-school financial data for work to improve equity with SEAs?

- » A. Yes
- » B. No, but I would like to use the data
- » C. No, I don't think this impacts my projects

Chat us or come off mute to share!

POLL: What would be most helpful moving forward?

- »A. Individual sessions on each equity provision
- »B. A community of practice
- »C. Sitting in on a resource allocation review
- »D. A list of what counts as a resource allocation methodology
- »E. Other - chat us!



This presentation is in the public domain. While permission to reprint is not necessary, publication should be cited. The presentation is prepared by the National Comprehensive Center under Award #S283B190028 for the Office of Program and Grantee Support Services (PGSS) within the Office of Elementary and Secondary Education (OESE) of the U.S. Department of Education and is administered by Westat. The content of the presentation does not necessarily reflect the views or policies of the PGSS or OESE or the U.S. Department of Education nor does mention of trade names, commercial products, or organizations imply endorsement by the U.S. Government. © 2019 Westat.