



# 2021 CIFR Part B Fiscal Webinar Series

IDEA Fiscal Timeline & Maintenance  
of State Financial Support (MFS)



# Agenda

- **Welcome**
- **CIFR Support and Objectives**
- **CIFR Part B Fiscal Webinar Series Information**
- **IDEA Fiscal Timeline Tool**
- **Maintenance of State Financial Support**
- **Wrap-Up**

# What Is CIFR?

The Center for IDEA Fiscal Reporting (CIFR) assists states to improve the quality of their collection, reporting, analysis, and use of IDEA Part B and Part C fiscal data.

Part B reporting requirements supported by CIFR are:

- Maintenance of state financial support (MFS)
- Allocation of IDEA Part B subgrants to local education agencies (LEAs)
- LEA maintenance of effort (MOE)
- Coordinated early intervening services (CEIS)

# CIFR Targeted Objectives

1. **Expand state knowledge** of IDEA Part B and Part C fiscal requirements and calculations.
2. **Increase state capacity** to collect, report, analyze, and use accurate IDEA Part B and Part C fiscal data.
3. **Improve state infrastructure** through the:
  - development and maintenance of well-defined and documented policies and procedures;
  - creation or adoption of needed tools and resources;
  - development of enhanced training systems; and
  - cultivation of strong cross-functional and cross-agency relationships.

# 2021 CIFR Part B Fiscal Webinar Series

Webinars will be:

- At least quarterly, based on upcoming fiscal activities
- Based on participant-identified needs
- Led by content experts, including SEA staff
- Interactive
- Evaluated
- Occasionally followed by an “open-door session” to address additional questions and facilitate state-to-state discussion



# Presenters



**Tye Ripma**



**Nancy O'Hara**



**Sara Doutre**

# IDEA Fiscal Timeline

Tye Ripma

# IDEA Fiscal Timeline (1 of 3)

Download the IDEA Fiscal Timeline!

<https://cifr.wested.org/customizable-idea-fiscal-timeline-helps-sea-staff-plan-work-and-meet-deadlines/>





# IDEA Fiscal Timeline (2 of 3)

## What is it?

- Excel-based tool for planning and managing state IDEA fiscal activities across the IDEA grant funding cycle
- Can also be a training tool and resource
- Fully customizable
- Developed by three centers with state feedback



# Fiscal Timeline Demonstration

# IDEA Fiscal Timeline (3 of 3)

CIFR Resource Catalog: <https://cifr.wested.org/resources/>

- Found in all topic areas

**When you download the IDEA Fiscal Timeline, three documents will appear:**

- IDEA Fiscal Timeline (Excel)
- Instructions for the IDEA Fiscal Timeline (PDF)
- Understanding the IDEA Grant Funding Cycle and Different Fiscal Years (PDF)

# Maintenance of State Financial Support (MFS)

Nancy O'Hara and Sara Doutre

# Maintenance of State Financial Support (MFS) (cont.)

- **MFS Highlights**
  - Requirements
  - Common Questions about MFS
  - Technical Assistance Topics
- **MFS Resources**
- **Looking Forward: MFS on the Horizon**

# MFS Requirements – Why?

## Why must state financial support be maintained?

- IDEA requires states to maintain their annual level of funds made available for special education and related services.
- MFS provides a safety net of support for LEAs.

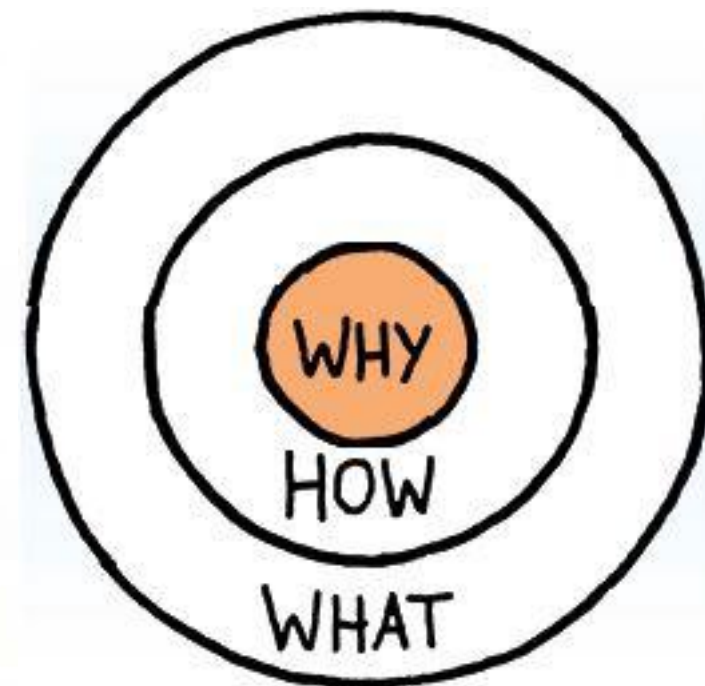


Image source: <https://medium.com/@ericasolis/chapter-3-start-why-why-7d479fd4b09c>



# MFS Requirements – How?

Total Amount of State Financial Support Made Available for Special Education and Related Services for Children with Disabilities	
SFY 2018	
SFY 2019	

Per capita amount of State Financial Support Made Available for Special Education and Related Services for Children with Disabilities	
SFY 2018	
SFY 2019	

## How does a state demonstrate it meets the MFS requirement?

- Section V of the annual state application for IDEA Part B funds
- Must be equal or show increase
- **Must** be reported in total
- **May** be reported per capita
- Auditable data
- Replicable calculation

# 34 CFR §300.163 Maintenance of State Financial Support

## (a) General.

A State must not reduce the amount of State financial support for special education and related services for children with disabilities, or otherwise made available because of the excess costs of educating those children, below the amount of that support for the preceding fiscal year.

## 34 CFR §300.163 Maintenance of State Financial Support (cont.)

(b) Reduction of funds for failure to maintain support.

The Secretary reduces the allocation of funds under section 611 of the Act for any fiscal year following the fiscal year in which the State fails to comply with the requirement of paragraph (a) of this section by the same amount by which the State fails to meet the requirement.

# Common Questions about MFS – What?

What does “**made available**” mean?

What **must** be included in the MFS calculation? What **may** be included?

Are there exceptions to MFS?

# What does “Made available” mean?

Made available is defined by each state

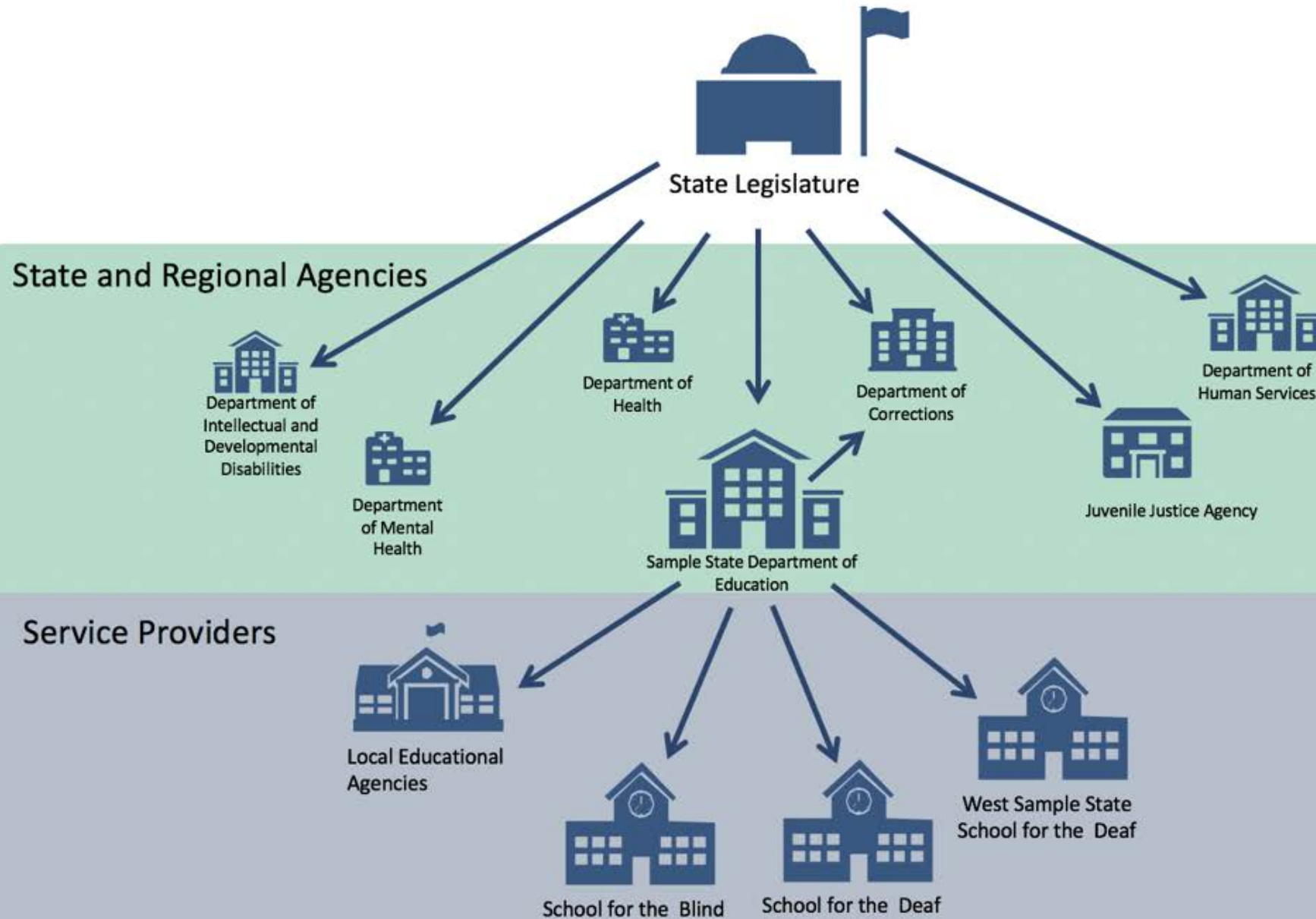
Funds allocated or appropriated through the state budget process, or otherwise made available by the state, for special education and related services to children with disabilities

May be allocated or made available **by** the legislature, the SEA, or other state agencies

May be allocated or made available **to** the SEA, LEAs, state agencies, etc.

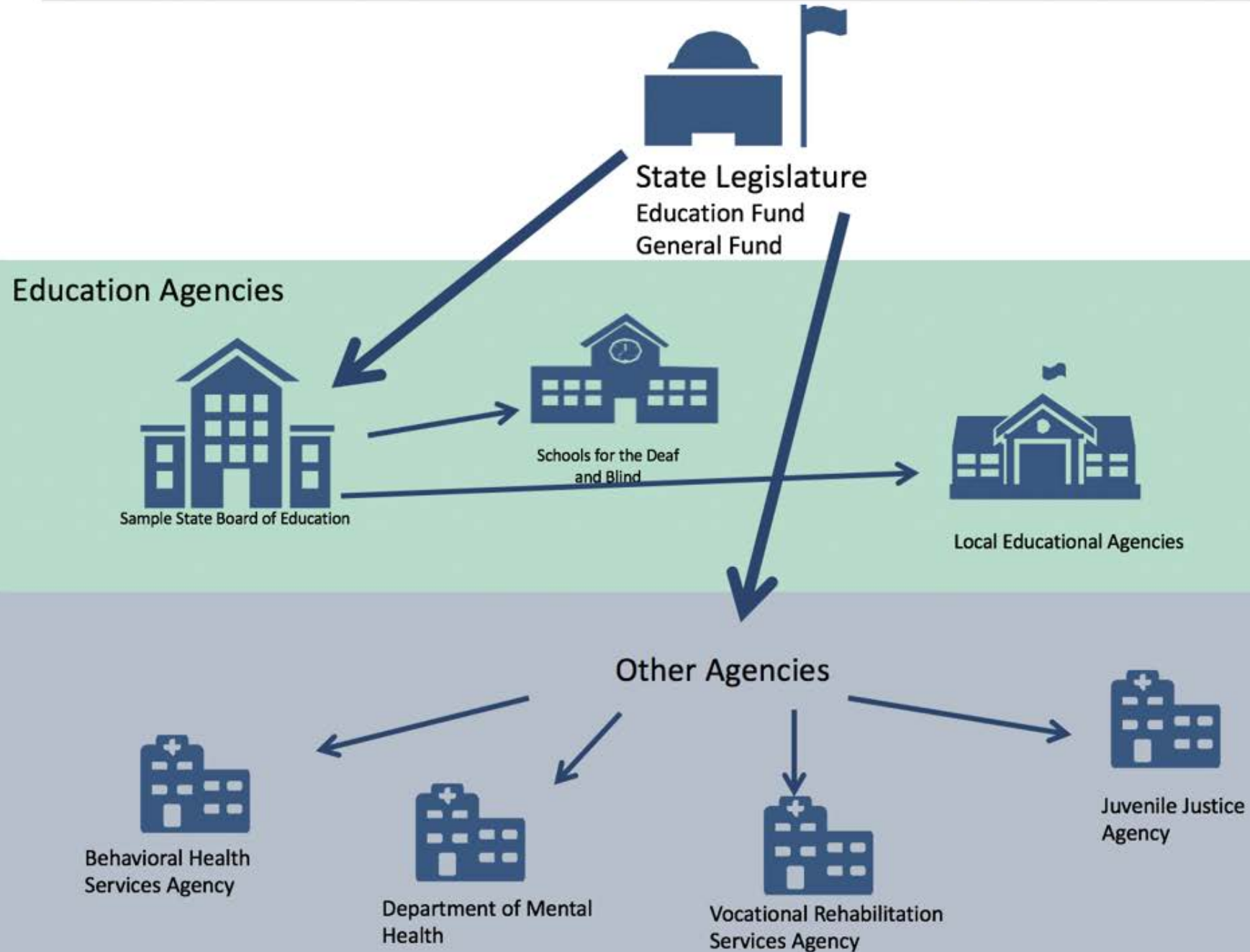
Does not mean “**expended**”

## Sample State Maintenance of State Financial Support





## Sample State Public Education Funding Flow Ideograph



# What **must** be included in the MFS calculation?

All state funds made available:

- Direct state legislative appropriations to support special education and related services
- Financial support for special education and related services made available by the SEA
- Financial support for special education and related services made available by other state agencies (OSEP Memorandum 10-5)

# What **may** be included in the MFS calculation?

Funds allocated directly to LEAs for special education and related services

Funds to other state agencies for vocational rehab, nursing, social work services, etc.

Alternate assessments

Preschool services for children with disabilities

Transportation for children with disabilities pursuant to IEPs

State schools for the deaf and blind

SEA staff who support special education and related services

Retirement contributions made by the state for special education personnel (e.g., teachers)

# Are there exceptions to MFS?

No. There are no exceptions, such as the allowable exceptions for local educational agency maintenance of effort (LEA MOE).

States must report total MFS amounts in Section V of the IDEA Grant Application.

- States have the option to report per capita amounts and can demonstrate sustained or increased funding with either calculation.

Waivers may be requested for one fiscal year at a time.

# MFS Waiver Requirements (1 of 2)

## 34 CFR §300.163(c)

Waivers for exceptional or uncontrollable circumstances. The Secretary may waive the requirement of paragraph (a) of this section for a State, for one fiscal year at a time, if the Secretary determines that:

- (1) Granting a waiver would be equitable **due to exceptional or uncontrollable circumstances such as a natural disaster or a precipitous and unforeseen decline in the financial resources of the State**; or
- (2) The State meets the standard in 34 CFR §300.164 for a waiver of the requirement to supplement, and not to supplant, funds received under Part B of the Act.

# MFS Waiver Requirements (2 of 2)

## 34 CFR §300.163(d)

Subsequent years. If, for any fiscal year, a State fails to meet the requirement of paragraph (a) of this section, including any year for which the State is granted a waiver under paragraph (c) of this section, **the financial support required of the State in future years under paragraph (a) of this section shall be the amount that would have been required in the absence of that failure and not the reduced level of the State's support.**



# MFS Technical Assistance Topics

- Assist SEA to develop methods to calculate MFS
- Build capacity of SEA to work with legislature and other agencies on MFS calculation
- Examine state's MFS calculation in anticipation of an MFS shortfall
- Prepare data to propose a change in the state's MFS calculation to OSEP
- Develop written MFS procedures for consistency and sustainability

Intensive TA Spotlight: South Carolina Success Story

<https://cifr.wested.org/what-is-intensive-technical-assistance-a-story-from-south-carolina/>

# Looking Forward: MFS on the Horizon

## Impact of COVID-19 and potential budget shortfalls on MFS

- Multiple years of projected revenue declines and budget shortfalls
- No statutory flexibility to meet MFS requirements
- MFS waivers are temporary, and states must return to the amount made available prior to a waiver

## What strategies are you using?

- To work with legislators and budget staff to build capacity on MFS
- To avoid potential MFS shortfalls due to revenue declines

# CIFR MFS Toolkit

<https://cifr.wested.org/resources/mfs/mfs-toolkit/>

## QRG



### Quick Reference Guide



Understand the basics of MFS requirements stipulated in the IDEA.

## FFIT



### Funding Flow Ideograph Tool



Create a graphic description of your state's fiscal support system.



Training Video

## TDT



### Timeline Development Tool



Create a timeline and document your process for collecting MFS data.



Training Video

## DCRT



### Data Collection and Reporting Tool



Download the entire Data Collection and Reporting Tool (DCRT). Alternatively, you can download the individual components:



Training Video



#### DCRT

Enter financial data from the SEA and other state agencies to ensure MFS reporting requirements are met. Detailed instructions for the tool are included.



#### MFS Calculation Checklist

Use this checklist to ensure that your MFS calculation is complete.



#### Letter to Other State Agencies

Customize this letter to request MFS data from other state agencies.

OPTIONAL ATTACHMENTS  
TO INCLUDE WITH THE LETTER

# Other MFS Resources

CIFR Practice Guide: Developing Written Procedures for MFS

<https://cifr.wested.org/wp-content/uploads/2018/08/CIFR-Practice-Guide-Developing-Written-Procedures-MFS.pdf>

OSEP Memorandum 10-05

<https://sites.ed.gov/idea/idea-files/osep-memo-10-05-maintenance-of-state-financial-support-under-the-individuals-with-disabilities-education-act/>

OSEP Process and Criteria Used to Evaluate a Request by States to Waive Maintenance of Effort (MOE) Requirements Under Part B of the Individuals with Disabilities Education Act (IDEA)

<https://www2.ed.gov/policy/speced/guid/idea/monitor/smfs-partb-waivers.html>

Flexibility on IDEA Part B Fiscal Requirements in the COVID-19 Environment Q&A Document (June 26, 2020)

<https://sites.ed.gov/idea/files/qa-fiscal-flexibilities-idea-part-b-06-26-2020.pdf>

# Practice Guide: Writing MFS procedures

**Component 1:** Purpose of State's MFS Procedures

**Component 2:** Staff Responsibilities and Timeline for Collecting, Validating, and Reporting MFS Data

**Component 3:** State's Definition of "Made Available"

**Component 4:** Direct Legislative Appropriations Supporting Special Education and Related Services

**Component 5:** SEA Financial Support for Special Education and Related Services

**Component 6:** Other State Agency Financial Support for Special Education and Related Services

**Component 7:** MFS Calculation

**Component 8:** Validating and Reporting MFS Data

**Component 9:** Actions in Case of Failure to Maintain Financial Support



# 2021 Webinar Dates

Each webinar in this series will be held from 2:00 – 3:00 p.m. EST

- February 19: MFS Open Door
- March 5: LEA MOE Webinar
- March 19: LEA MOE Open Door
- April 2: TBD
- July 1: TBD
- October 1: TBD

Registration will be required to get the connection information for each webinar.



# Potential April Topics

- **Fiscal data processes: Have you documented your processes?**
- **Allocation of subgrants and the Uniform Guidance**
- **Understanding the poverty and population formulas**
- **Reallocation of IDEA funds**
- **MOE reduction and CEIS data**
- **Fiscal oversight of CEIS**
- **IDEA high-cost funds**

# Contact Us



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CONTACT US  
State TA Liaisons

Each state and entity has a Technical Assistance (TA) liaison for each Part B and Part C program it operates to serve as a primary point of contact with CIFR. By assigning state TA liaisons for each program, CIFR ensures direct, timely access to fiscal content expertise. Please reach out to your state TA liaisons for any needs you may have.

Alabama	Mississippi
Alaska	Missouri
Arizona	Montana
Arkansas	Nebraska
American Samoa	Nevada
Bureau of Indian Education	New Hampshire
California	New Jersey
Colorado	New Mexico
Commonwealth of the Northern Mariana Islands	New York
Connecticut	North Carolina
Delaware	North Dakota
District of Columbia	Ohio
Federated States of Micronesia	Oklahoma
Florida	Oregon

The Center for IDEA Fiscal Reporting (CIFR) is a partnership among WestEd, AEM Corporation, American Institutes for Research (AIR), Emerald Consulting, the Frank Porter Graham Child Development Institute at the University of North Carolina at Chapel Hill, the Center for Technical Assistance for Excellence in Special Education (TAESE) at Utah State University, and Westat. The Improve Group is CIFR's external evaluator.

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