

# CIFR 2023 Fiscal Webinar:

Allocating IDEA Part B LEA Subgrants

April 11, 2023



### Presenters





**Steve Smith** TA Liaison, CIFR



**Laura Johnson** TA Liaison, CIFR



**Lisa Pofelski-Rosa**Financial Specialist, Idaho





### Agenda

- LEA Eligibility for IDEA Part B Subgrants
- Base Payments and Adjustments
- Population and Poverty Allocations
- State Presentation: Idaho





### Local Educational Agency Eligibility for IDEA Part B Subgrants





### What Are IDEA Part B Subgrants?

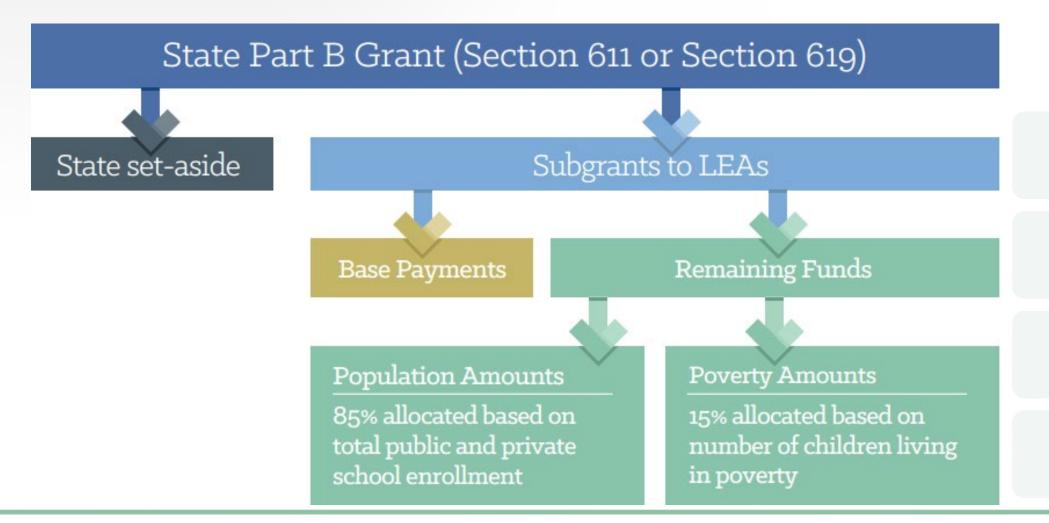
States must distribute any Section 611 and Section 619 funds that are not reserved for state-level activities to eligible LEAs, including charter school LEAs.

- 34 CFR §300.705(a) for Section 611, ages 3–21
- 34 CFR §300.815 for Section 619, ages 3–5
- LEAs do not need to be serving children with disabilities (CWD) to be eligible





### IDEA Part B Allocations at a Glance







### LEA Eligibility for IDEA Part B Subgrants

- Meets state's definition of an LEA
- Makes free appropriate public education (FAPE) available under IDEA to all eligible CWD between ages 3 and 21 (inclusive)
- Submits application for IDEA funds to the state with assurances the LEA meets certain conditions





### **LEA Application**

- Subgrant funds may not be obligated until the SEA receives a substantially approvable application from the LEA
  - Submitted to the SEA on June 28: period of performance starts July 1
  - Submitted to the SEA on July 6: period of performance starts July 6
- Applications may also include
  - Use of funds information for IDEA funds
  - Budget information for state and local funds typically used for LEA MOE purposes



### New Requirement: GEPA Section 427



- GEPA Section 427 also applies to subgrantee applications (including IDEA Part B LEA applications)
- State is responsible for reviewing subgrantee applications for GEPA Section 427
- FFY 2023 three options for subgrantee applications:
  - Require subgrantees to use and submit the updated GEPA section 427 form;
  - Require subgrantees to use and submit a previously approved GEPA section 427 description; or
  - Allow subgrantees to submit their own description or a form that is sufficient to meet the requirements of GEPA section 427.





### Special Notes: LEA Eligibility

- All eligible LEAs will receive an allocation based on population and poverty formula even if not currently (or ever) serving children with disabilities.
- If an LEA could serve 5-year-olds in kindergarten, it is eligible for a Section 619 subgrant based on population and poverty.





# Base Payments and Adjustments





### IDEA Part B Base Payments to LEAs

- For 611: The amount an LEA would have received if the SEA had distributed 75 percent of the state's federal fiscal year (FFY) 1999 Section 611 grant, using the LEA's 1998 count of CWDs ages 3 through 21
- For 619: The amount an LEA would have received if the SEA had distributed 75 percent of the state's FFY 1997 Section 619 grant, using the LEA's 1996 count of CWDs ages 3 through 5
- The individual LEA base payment amounts stay the same from year to year unless adjustments are required
- The total statewide base payment amounts never changes



## Circumstances Requiring Base Payment Adjustments



- A new LEA (including a new charter school LEA) is created
- Two or more LEAs combine into a new, single LEA
- Two or more LEAs change geographic boundaries or administrative responsibility for providing services to children (including when one or more LEA closes)



## Circumstances Requiring Base Payment Adjustments (continued)



- An LEA that had a base payment of zero in its first year of operation (because it did not serve CWD) but now serves CWD
- A charter school LEA significantly expands its enrollment





### Timing of Base Payment Adjustments

- Adjust allocations throughout the year using actual data, once available
  - Preliminary calculations will rely on child counts from the prior year or projected child counts because current-year data are not yet available
- Allocations may be adjusted throughout the year up until the initial allocation is made for the following federal fiscal year's IDEA Part B funds





### Base Payment Adjustments: Questions

- What questions do you have about base payment adjustments?
- What is your biggest challenge with base payment adjustments?





# Population and Poverty Allocations





### Population and Poverty Allocations

Funds remaining after state set-aside and statewide base payment total are deducted from the state grant:

- Distribute 85% using the number of children enrolled in public and private elementary and secondary schools within the LEA's jurisdiction relative to enrollment of all LEAs
- Distribute 15% using each LEA's relative number of children living in poverty, as determined by the SEA





### Data Sources: Population

Relative number of children enrolled in public and private schools within the LEA's jurisdiction

- Best and most recent data available based on state rules and timing for enrollment counts
- Typical sources are snapshot of enrollment in public and private schools gathered through state data systems, like "9/20 enrollment" or the "October Enrollment of Public and Private Schools"
- Counts should be the same for Sections 611 and 619





### Data Sources: Poverty

Relative number of children living in poverty as determined by the SEA

- Determination about the source for poverty counts is made by the SEA; should be on a uniform basis across all LEAs using best data available
- Typical sources include National School Lunch Program (NSLP) or U.S. Census poverty data
- Counts should be the same for Sections 611 and 619





### Population/Poverty: Questions

- What questions do you have about population and poverty amounts?
- What data sources do you use for population and poverty?
- What is your biggest challenge with population?
- What is your biggest challenge with poverty?





### State Presentation: Idaho



### Idaho's IDEA Part B LEA Allocation Method



After setting aside necessary and allowable amounts for state administration and other state-level activities (as described in 34 CFR §300.704(b)), the Idaho State Department of Education (ISDE) gives the remainder of the grant as flow-through sub-awards to Idaho school districts and LEAs. This is computed following the federal requirements outlined under 34 CFR §300.705.

### Idaho's Low-Income Data Collection



### Idaho's Annual Allocation Process Step 1 **Low-Income Data Collection**

1. Gather low-income rates through a point-intime data collection through our Child Nutrition Department from the collected Free and Reduced Lunch (FRL) program. Due first Friday in March.



Data collected is also used for other purposes such as Title I funding and E-Rate.

### **Income Surveys**



Charter LEAs, private schools, or other LEAs that do **not** operate free and reduced-price lunch programs under the NSPL must acquire information about the number of students in the school whose families meet the same low-income eligibility guidelines in another manner.

### Example of income survey:

Family Name or Foster Child Family Name

#### INCOME ELIGIBILITY GUIDELINES

Effective from July 1, 2022 to June 30, 2023

HOUSEHOLD SIZE	ANNUAL	MONTHLY	TWICE	EVERY	WEEKLY
			PER	TWO	
			MONTH	WEEKS	
1	25,142	2,096	1,048	967	484
ı	or less				
2	33,874	2,823	1,412	1,303	652
3	42,606	3,551	1,776	1,639	820
4	51,338	4,279	2,140	1,975	988
5	60,070	5,006	2,503	2,311	1,156
6	68,802	5,734	2,867	2,647	1,324
7	77,534	6,462	3,231	2,983	1,492
8	88,266	7,189	3,595	3,318	1,659
For each					
additional family					
member add:	8,732	728	364	336	168

### **Community Eligibility Provision**



- <u>Community Eligibility Provision</u> (CEP) allows schools and LEAs to provide free breakfast and lunch to all students in high-poverty areas, where 40% of student enrollment at a given school may qualify as CEP.
- CEP determines eligibility from programs such as the Supplemental Nutrition Assistance Program (SNAP) and the Temporary Assistance for Families in Idaho (TAFI) instead of relying on the collection of household applications.
- We apply the 1.6 multiplier to this data to approximate FRL meals count for a CEP school.

### Idaho's Enrollment Data Collection



### Idaho's Annual Allocation Process Step 2 **Enrollment Data Collection**

- 1. Obtain best/updated fall enrollment data from the School Finance Department. Due March 31.
- Import data by LEA into a calculation spreadsheet to be used as a multiplier with the low-income data.

### New & Significantly Expanding Enrollment



A significant expansion is a substantial increase in the number of students attending a charter school because of a significant event that is unlikely to occur on a regular basis, such as the addition of one or more grades or educational programs in major curriculum areas. To qualify under (I.C. 33-5208(6) and §76.787, a request may be submitted if the charter school is:

- Adding a grade level
- Increasing enrollment within existing grades by 10% or more classes
- Adding a grade level and an increase in enrollment

### **Determining the Home LEA Information**

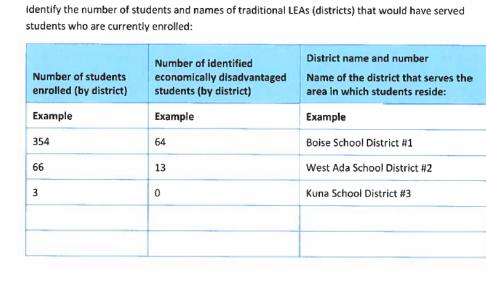




#### Federal Funding Certification of Economically Disadvantaged (i.e. Low-Income) Student Count & New and Significantly Expanded Charter LEAs

ex: 23				
Actual number of o	children whose families	meet economically disadvantag	d (i.e. low-income) student count guidelines (use the	most current available data) *
			itional LEA's (district's) which would have served stu ents from the traditional LEA attending the charter LE	idents who are currently enrolled in your charter school. The count of students qualifying A. *
* LEA Name	* LEA #	* Add the number of students who attend	Add the number of students who qualify	
Plea <b>∨</b>	Ple; <b>∨</b>	the Charter LEA. The Charter LEA students reside in the	for free and reduced lunch. The Charter LEA students reside	
		traditional LEA (district) boundaries.	in the traditional LEA (district) boundaries.	

Current total enrollment (Use the most current available data)



Number of children whose families meet economically disadvantaged (i.e. low-

Current enrollment: 423

income) guidelines: 77

### **Base Allocations and New Charter Schools**



- The base amount for individual LEAs was determined according to the funding formula applied to the total in 1999.
- As new charter LEAs come into existence each year, the base amounts of individual districts are adjusted based on determining which districts would have otherwise been responsible (Home LEA) for providing services to the children in special education in the new charter LEAs.

### Idaho's Base Payment Methodology



### **Idaho's Annual Allocation Process Step 3 Base Payment Methodology 611 Funds**

 Each LEA receives a base payment—a predetermined amount equal to 75% of the total IDEA Part B 611 grant that the state received in FY 1999-2000.

### **Base Payment Methodology 619 Funds**

 The LEA funding formula for preschool allocations is found at 34 CFR §300.816 and is very similar to the 611 method with the exception that the base amount is equal to 75% of the total IDEA Part B 619 grant that the state received in FY 1997–1998.

### When Base Adjustments Qualify



### Base allocation adjustment is done only if:

- 1. A new LEA, including a new charter, is created
- 2. Two or more LEAs combine into a new single LEA
- 3. Two or more LEAs change geographic boundaries or administrative responsibility for providing services to children ages 3 through 21 or 3 through 5
- 4. An LEA that had a base payment of \$0 in its first year of operation (because it did not serve children with disabilities) now does serve CWDs

### Idaho's Base Payment Calculation Process



- LEAs that were new the prior year (mostly charter schools) will need a base allocation.
- The spring before opening new LEAs must send ISDE an enrollment and low-income estimate at the student level. This data is updated in the fall of the first year of opening.
- In the second year of an LEA opening, ISDE will assign a base allocation based on the "Home LEA" of origin.

### **Base Payment Calculation New LEA**



- A data collection of the "Home LEA" is used to import into a data calculation worksheet that lists the "LEA From/Home LEA." The new LEA becomes the "LEA TO" for calculations.
- Students are identified by age group for a base allocation adjustment to 611 or 619 funding.
- The Home LEA base is reduced by the count of students moving to the new Charter LEA.
- Our SEA total base allocation cannot exceed the original amount determined.

### Base Payment Adjustment LEA Dissolved



- A data collection of the "Closed LEA" is used to import into a data calculation worksheet that lists the "LEA From/Closed LEA."
- The "Home LEA" becomes the "LEA TO" for base calculation adjustments.



- Students are identified by age group, for a base allocation adjustment to 611 or 619 funding.
- The "Dissolved/Closing LEA" base is reduced to zero, as determined by where the students ended up the following fall (through enrollment data).

### **Example of Base Allocation**



- LEA "DEF" is a new charter that has 17 students from various "Home Districts."
- The Home District's total child count is reduced, and a "proportionate share" of the base allocation is transferred to the new charter school. This is done in year 2 of the new charter.

LEA TO Name	Charter childCount	LEA # from	District of Residence Count	Total Count	Ba	se Allocation	Cha	rter New Base Allocation	Dist	trictNew Base Allocation
ABC	1	215	183	184	\$	181,292.00	\$	985.00	\$	180,307.00
	1			184	Ş	181,292.00	Ş	985.00	Ş	180,307.00
DEF	10	2	4376	4386	\$	1,104,476.00	\$	2,518.00	\$	1,101,958.00
	1	3	796	797	\$	115,107.00	\$	144.00	\$	114,963.00
	1	134	347	348	\$	111,256.00	\$	320.00	\$	110,936.00
	1	351	425	426	\$	53,655.00	\$	126.00	\$	53,529.00
	1	454	20	21	\$	14,906.00	\$	710.00	\$	14,196.00
	1	534	18	19	\$	17,033.00	\$	896.00	\$	16,137.00
	2	550	22	24	\$	5,068.00	\$	422.00	\$	4,646.00
	17			6021	\$	1,421,501.00		5136		1,416,365.00
GHI	9	91	1266	1275	\$	641,357.00	\$	4,527.00	\$	636,830.00
	16	495	49	65	\$	8,223.00	\$	2,024.00	\$	6,199.00
	25			1340	\$	649,580.00	\$	6,551.00	\$	643,029.00

### **Calculations**



### Putting it all together in a calculation sheet.

LEA NAME		Public Enrollment Fall 2019	District Charter Enrollmen t/Sig Expansion	Total Public Enrollment	Non-public enrollment (as reported by SD on Part B	Public + Nonpublic Enrollment	Low Income Count		Adjusted base allocation	Population Allocation	Low Income Count Allocation	Initial IDEA Part B Allocation 2022-2023
	7	~	_	~	Applicatic ▼	▼	- 1	-	▼	~		▼
								+		114.1	52.9	
123 SCHOOL		9,622	108	9,730	861	10,591	4,884		399,485.00	1,208,361.00	258,234.00	1,876,964
456 SCHOOL		1,281	21	1,302	109	1,411	785		70,340.00	160,985.00	41,502.00	274,759
789 SCHOOL		1,648		1,648	34	1,682	618		84,565.00	191,905.00	32,673.00	309,143
321 SCHOOL		541	238	779		779	177		6,350.00	88,879.00	9,358.00	104,587
654 SCHOOL		322		322		322	114		15,241.00	36,738.00	6,027.00	58,213
ABC SCHOOL		-	101	101		101	25		0.00	11,523.00	1,322.00	12,845
GHI SCHOOL		271	145	416		416	183		6,279.00	47,463.00	9,675.00	63,417
JKL SCHOOL		216		216		216	25		4,646.00	24,644.00	1,322.00	30,612
MNO SCHOOL		411		411		411	98		5,136.00	46,892.00	5,181.00	57,395
PQR SCHOOL		125		125		125	10		3,315.00	14,262.00	529.00	18,106
NEW LEA1			214	214		214	56		0.00	24,416.00	2,961.00	27,377
NEW LEA2			240	240		240	96		0.00	27,382.00	5,075.00	32,457
NEW LEA3	ı		290	290		290	174		0.00	33,087.00	9,199.00	42,286
		312,349	5,054	317,403	14,302	331,705	126,32	2	14,289,101.00	37,845,221.00	6,678,566.00	59,044,257

### Final Thought



Remember your "why" and who your efforts are serving.

Lisa Pofelski-Rosa | Financial
Specialist, Principal
Special Education Department
Idaho State Department of
Education
Superintendent Debbie Critchfield
(208) 332-6916 | sde.idaho.gov







### Questions?



### CIFR Resources



- Quick Reference Guide on the Allocation of IDEA Part B Subgrants to Local Education Agencies
- Practice Guide: Examples of Adjustments to the IDEA Subgrant Base Payments for Local Educational Agencies
- Practice Guide: Developing Written Procedures for the Allocation of IDEA Part B Subgrants to Local Educational Agencies
- IDEA Part B Allocations at a Glance
- Which Child Count Should I Use?
- IDEA Part B Subgrant Base Payment Adjustment Calculators





### CIFR 2023 Part B Fiscal Webinar Series

Webinars from 1:00 to 2:00 p.m. ET

- July 11, 2023
- October 10, 2023

Register at <u>cifr.wested.org</u> to get the link for each webinar.



### Contact Us





Web
Email
Twitter
LinkedIn

cifr.WestEd.org
cifr info@WestEd.org
@CIFR IDEA
linkedin.com/groups/13978790/