IDEA Maintenance of Effort Navigating MOE in the Budget Cycle

Individuals with Disabilities Education Act

WASBO Spring Conference May 2024



Federal Grant Compliance - "Maintenance of Effort"

Under the Individuals with Disabilities Education Act (IDEA), every Local Education Agency must expend the same amount of local funding for special education instruction and related services as it expended in a previous fiscal year (34 CFR §300.203)

Under Federal regulations, every State Education Agency must monitor each of its LEAs annually to determine if the "IDEA MOE" compliance measure has been met.

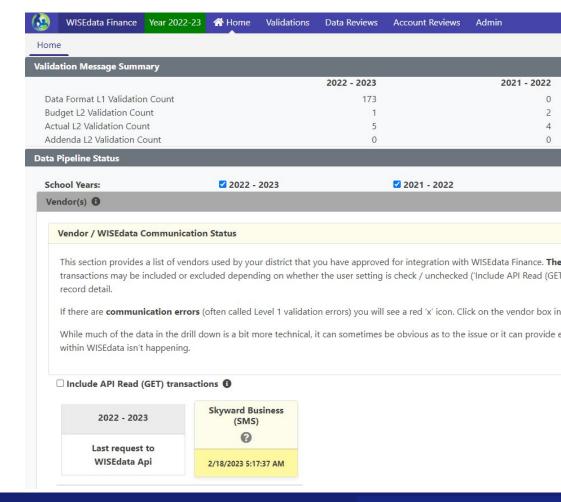
An LEA's failure to meet the IDEA MOE compliance standard results in a cash penalty matching the amount the LEA lowered its local spending.

This cash penalty, collected by the SEA, is sent to the US Department of Education.

WISEdata Finance

New financial data reporting system for LEAs that links their financial system directly to DPI was launched for FY 2021-2022.

Links from WISEdata Finance to other DPI financial systems.



Quick Review of the Basics

WUFAR Sequence of Dimensions - Expenditures

Fund

Location

Object of Expense

Function

Project

FUND

Two-digit code used to segregate major educational costs such as General Education, Special Education, Food Service, Capital Projects, and Community Service.

OBJECT

Three-digit expenditure code identifying the purchase - whether it be salaries, contracted service, supplies, software or equipment.

FUNCTION

Six-digit expenditure code identifying the purpose of the purchase.

WUFAR has 407 official functions to describe everything from "Algebra" to "Specialized Pupil Transportation."

PROJECT

Three-digit expenditure code identifying how the LEA will pay for the cost (local, state or federal funding).

Fund 27

Contains all costs related to special education

Project 011

Expenditures eligible for state special education categorical aid reimbursement or Medicaid SBS

Project 019

Expenditures not eligible for state aid or Medicaid SBS

Grant Project

Expenditures reimbursed with federal or state special education-related *grant* dollars

Only project 011 and 019 tagged expenditures are used for IDEA MOE compliance comparisons

The Importance of Fund 27 Project Codes

Expenditures in Fund 27 will NOT be recognized if they have a local Project Code of "000"

Only the DPI Chart of Accounts uses Project 000 in order for all local expenses to be mapped to a DPI established Fund-Object-Function

All expenditures in Fund 27 MUST have a project code that is recognized by DPI

- All non-grant funded expenditures will have a code of Project 011 or 019
 - ➤ DPI plans to retire Projects 091 and 092 from WUFAR
- All other project codes must be recognized by DPI per the <u>Aids Register</u> <u>WUFAR Codes</u>

Project "000" - Why Does it Matter?

IDEA MOE Compliance - Test #1 - Sum of State and Local Special Education Costs

Project Code	Expenditures
011	\$250,000
019	\$45,000
Test #1 Total	\$295,000

Project Code	Expenditures
011	\$240,000
019	\$20,000
000	\$35,000
Test #1 Total	\$260,000

When an expense does not have a Local Project Code, we do not know how to recognize it...is it Project 011? is it Project 019? Grant funded?

Consequences of leaving an expense at Project "000"

- First and foremost, the LEA may be <u>under reporting</u> its obligation for special education, which leads to two different unacceptable results:
 - failing the comparison test; or
 - meeting the comparison test but setting a new lower threshold based on inaccurate data.
- Costs that should be coded to Project 011 will not be recognized as eligible for special education state categorical aid, resulting in a loss of funds to the LEA.
 - LEAs manually fixed these issues in the former School Financial Services reporting portal, but this will not be in option in WISfip.

Easiest Quick Check within the MOE Compliance Report



As a means for data quality support, any expenses pushed to WISEdata Finance with a local Project Code of "000" will be viewable in the IDEA MOE Compliance Report.

All panels within WISEgrants are "collapsible" - so within this pop-up, collapse the first panel "State / Local Accounts with values greater than \$0.00," and if you see this:

WISEdata Finance: State/Local Actual 2022-2023

State / Local Accounts with values greater than \$0.00 - Not Part of MOE Calculation

Fund 27 Expenditure Accounts with No Project Code - Not Included in MOE Calculation

Export to Excel

Local Account Number

DPI Account Number

Account Description

Payment to County - Contracted Special Education Instruction or Additional/Excess Cost Tuition

\$386,328.94

It means this LEA has expenses pushing to WISEdata Finance that are not counting towards <u>anything</u> and so under reporting Test #1 by over \$300,000.

If you do not see this panel, then all expenses reported have a Project Code.

Using a Local Project Code - Why Does it Matter?

IDEA MOE Compliance - Test #1 - Sum of State and Local Special Education Costs

Project Code	Expenditures
011	\$528,118
019	\$100,000
Test #1 Total	\$628,118

Project Code	Expenditures
011	\$528,118
019	\$50,359
703	\$49,641
Test #1 Total	\$578,477

An LEA wanted to use a local project code to identify the costs they were going to cover with Transition Incentive Aid (which is not a grant). The MOE Compliance report <u>only</u> sums expenditures coded to Project 011 or 019.

Trickier to find, as one needs to look in WISEdata Finance

WISEgrants can identify a potential issue:

Test 2: Current Year Local Only Compared to Amounts from Last Year Test 2 was Met

Difference between WISEgrants Calculation of the LEA's operating transfer amount and what is reported through WISEdata Finance: \$49.641.06

WISEgrants Prediction

Local Only Cost

\$514.608.04

Current Year:

2022-2023

\$464,966.98

19 costs

The WISEgrants Prediction takes the total of Project 011 and Project 019 costs and subtracts all reported non-grant revenue to determine the operating cost.

After eliminating other possibilities, look to WISEdata Finance for expenditures coded to non-recognized Project Codes (they will not show up in the MOE report).

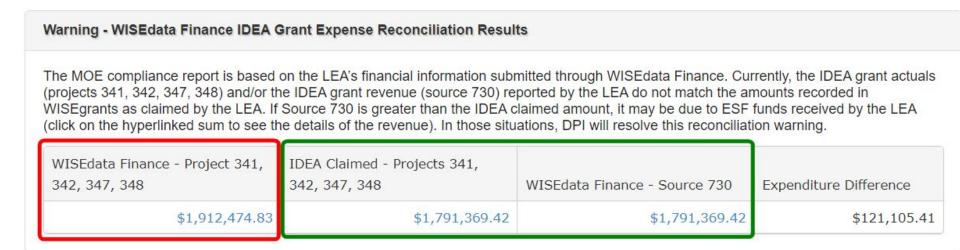
Correctly Recording IDEA Funding

Project 34X Sum = IDEA Funding Received

Expenditures tagged with IDEA Formula / Discretionary Grant Project Codes (34X) must equal the amount of IDEA funding received by the LEA

- Not greater than; Not less than
- A subrecipient's ledger should MATCH the IDEA formula / discretionary grant claim; at a bare minimum, the bottom lines must reconcile
- Significantly impacts the results of Test #1 total of State & Locally funded Special Education costs
- * #1 Issue with FY 2022-2023 WISEdata Finance / IDEA MOE

Over Identifying Project 34X Expenditures

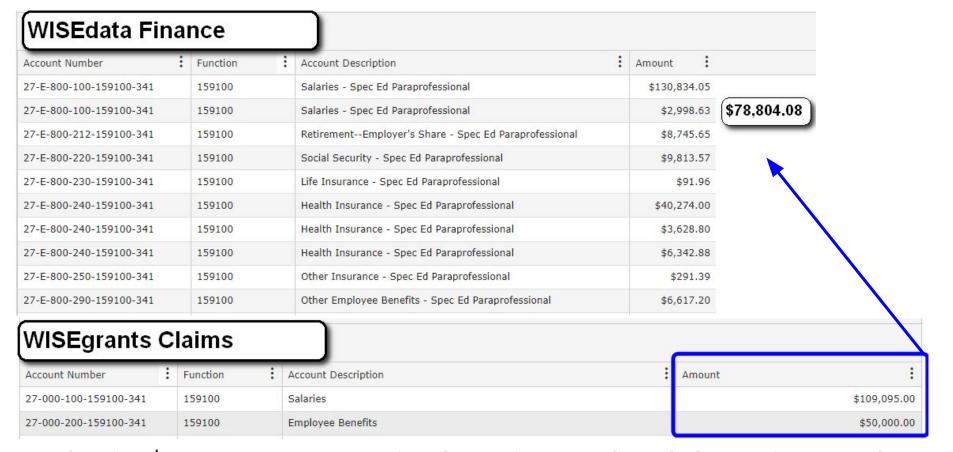


LEA left \$121,105 coded to Project 341, when the expenditures should have been reclassified to either Project 011 or Project 019 (depending on the expenditure).

Impact on Test #1 - State & Local - Sum of Projects 011 & 019



Not only is the reported sum of state and local expenditures under reported, if any of the \$121,105 was eligible for state special education categorical aid, it would not have been recognized as such.



By leaving \$50,543 of paraprofessional costs incorrectly coded to Project 341, the LEA lost out on \$14,657 in state special education categorical aid (which would only be recognized if it was coded to Project 011)

Fix as soon as discrepancies are known

WISEdata Finance - Project 341, 342, 347, 348	IDEA Claimed - Projects 341, 342, 347, 348	WISEdata Finance - Source 730
\$183,437.65	\$183,437.65	\$183,437.65

At the top of the IDEA MOE Compliance Report, within the Grant Expense Reconciliation table, if these three numbers do not match at the end of the fiscal year - click on the hyperlinked amounts under the WISEdata Finance Project column and IDEA Claimed column and do a side-by-side comparison to identify the issue.

Before exporting the data to excel (to do the comparison between systems), click on the vertical ellipses to unhide the WUFAR dimensions:

Financial Details: WISEdata Finance - Project 341, 342, 347, 348

	t here to group by th	at columi	n					
Account Number	Object	: Fu	nction	<u> </u>	Project	:	Account Description	1
27-E-001-100-156600-341	100	15	6600	↑ Sort A	scending		Salaries - Speech of Impairment	r Langua
27-E-100-100-156600-341	100	15	6600	↓ Sort Descending			Salaries - Speech or Langua Impairment	
27-E-001-212-156600-341	212	15	6600	Colum	nns		Fiscal Year Account Number	r's Sha mpair
27-E-100-212-156600-341	212	15	6600	Filter			Fund Object	r's Sha Impair
27-E-001-220-156600-341	220	15	6600		341		Function	ch or
27-E-100-220-156600-341	220	15	6600		341	1	Project Account Description	ch or
27-E-001-230-156600-341	230	15	6600		341		Amount	ch or L

Correcting the Issue

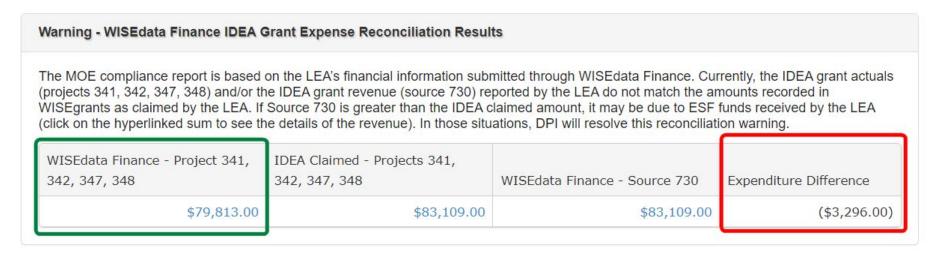
1) Only the accounts on the claim should show up as a Project 34X on the LEA's ledger



2) All other expenditures the LEA has classified to Project 34X that are <u>not</u> on a WISEgrants claim must be reclassified to Project 011 or 019.

Technical Assistance - <u>Identifying a Fund 27 Cost as Project 019 or 011</u>

Under Identifying Project 34X Expenditures



If the LEA claimed funds under IDEA but then decided to locally fund the cost, the federal funds *must* be returned to DPI. The returned funds will go back into the LEA's allocation for future allowable costs.

Technical Assistance - Returning IDEA Funds to DPI

Finalize FY 2023-2024

Our Goals so We Can Focus on Maximizing Revenue

- Resolve coding issues prior to the end of the fiscal year
 - The expenditures coded to Project 011 and 019 in the LEA's local system push successfully to WISEdata Finance
 - Project 34X expenditures match between WISEdata Finance and WISEgrants
 - Sum of grant-related expenditures have matching offsetting revenue
 - Meet one of the four compliance tests, but try not to set a new higher threshold if there are federal funds (IDEA formula) that can be used to cover the additional costs.

If you have your laptop...

- Log into WISEgrants
- Go to IDEA > Maintenance of Effort
- Click on the hyperlinked "Compliance Report" for 2023-2024

	Eligibility (Budget to Actual)		Compliance (Actual to Actual)		
Fiscal Year	Eligibility Status	Eligibility Report	Compliance Status	Compliance Report	
2023-2024	Met	Eligibility Report	Failed - Preliminary Based on Actuals to Date	Compliance Report	

Maintenance of Effort for Compliance is failing by \$124,212.81					
	State & Local (Project 011 & 019)	Local Only (Fund 10 to 27 Transfer)	State & Local Student per Capita (Oct. 1 Child Count)	Local Only Student Per Capita (Oct. 1 Child Count)	
Comparison Difference	(\$184,612.34)	(\$389,560.06)	(\$154,412.52)	(\$366,644.64)	
	Failed (\$154,412.63)	Failed (\$359,360.35)	Failed (\$124,212.81)	Failed (\$336,444.93)	

To schedule an appointment (virtual or by phone) with Rachel Zellmer to discuss IDEA Maintenance of Effort, please visit the DPI Special Education IDEA Fiscal Bookings site.

Please Note: The MOE Eligibility and Compliance reports are populated by WISEdata Finance. In order to accommodate page loading speed, this data is cached nightly by WISEgrants. Changes that are pushed to WISEdata Finance today will appear in the IDEA MOE reports tomorrow.

2023-2024	Local Account	Local Budget	Local Actual
WISEdata Finance Portal - Data Last Received	2/27/2024 4:51:05 PM	2/27/2024 4:51:05 PM	2/27/2024 4:51:08 PM

The dates above represent the last time Fund 27 expenditures and revenue accounts were pushed to WISEdata Finance. If the LEA only pushed Fund 10 accounts, the dates on the IDEA MOE report and WISEdata Finance may not match.

These test results are based on the LEA's Fund 27 Actuals, submitted through WISEdata Finance. When was the last time finance information was pushed?

Test 1: Current Year State/Local Actual Compared to Amounts from Last Year Test 1 was Met

2023-2024 Actual State / Local Goal: \$4,441,075.82

Progress toward goal: 92.03% (under by \$354,018.80)

		State/Local Cost	Less Revenue	Actual State/Local
Current Year:	2023-2024	\$4,152,606.75	\$65,549.73	\$4,087,057.02
Last Year Met:	2022-2023	\$4,759,378.78	\$138,606.24	\$4,620,772.54
			Difference:	(\$533,715.52)

Under Test 1, the user can see the "Progress toward goal" which represents how close the LEA is to meeting Test 1 (the only test the LEA can control).

Test 1: Current Year State/Local Actual Compared to Amounts from Last Year Test 1 was Met

2023-2024 Actual State / Local Goal: \$692,743.90

Progress toward goal: 59.52% (under by \$280,437.55)

		State/Local Cost	Less Revenue	Actual State/Local
Current Year:	2023-2024	\$417,279.24	\$4,972.89	\$412,306.35
Last Year Met:	2022-2023	\$731,442.54	\$38,698.64	\$692,743.90
			Difference:	(\$280,437.55)

Based on the expenditures to date, information is provided under Test #1 letting the LEA know how close they are to meeting the required threshold.

If the percentage seems low for 8 months into the fiscal year, determine if your LEA has July / August payroll payments that will make up the difference.

Enter projections into the Scenario Calculator in this report, on a regular basis, to ensure that one of the four comparison tests will be met.

Change the 2023-2024 Actual State / Local Goals through Exceptions:

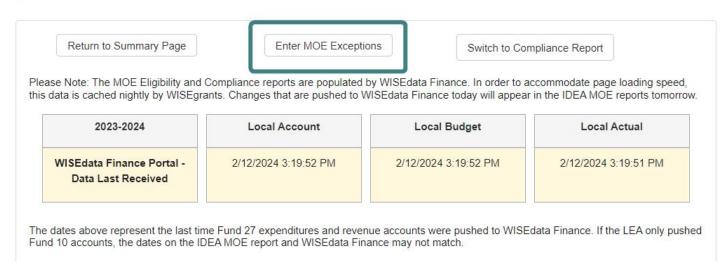
Approved Exceptions	
Voluntary Departure of Special Education Staff	\$26,432.81
Student with costly special education services left the LEA or no longer needs the costly program	\$15,790.00
Totals	\$42,222.81

	I State / Local Goal: \$1		The goal decreased by \$42,222	.81
Progress toward	goal: 53.43% (under b	y \$522,442.61) State/Local Cost	Less Revenue	Actual State/Local
Current Year:	2023-2024	\$610,841.47	\$11,429.41	\$599,412.06
Last Year Met:	2022-2023	\$1,213,552.66	\$49,475.18	\$1,164,077.48
			Difference:	(\$564,665.42

IDEA Maintenance of Effort (MOE) Eligibility Report - 2023-2024

Maintenance of Effort for Eligibility has been met						
O a manada a m	State & Local (Project 011 & 019)	Local Only (Fund 10 to 27 Transfer)	State & Local Student per Capita (Oct. 1 Child Count)	Local Only Student Per Capita (Oct. 1 Child Count)		
Comparison Difference	\$270,874.56	\$264,644.07	\$114,362.12	\$64,499.20		
	Met	Met	Met	Met		

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Voluntary Departure of Special Education Staff Transitioning from the 2022-2023 school year to the 2023-2024 school year, did any special ed LEAs may enter data manually or use a template to upload staff departures. 1. Click "Download" to download an Excel file listing the schools. 2. Enter data on the template. 3. Save the file to your computer as a .CSV file. 4. Click "Select File" to find the file on your computer. 5. Click on the file name. 6. Click "Open" 7. Click "Upload" to upload the file. (This may take a few seconds.) 8. Review the data to make sure it is correct. 9. Changes may be made to individual records or the template may be re-loaded. + Add Staff Reason for Leaving Former Name Former Salary \$0.00 Student with costly special education services left the LEA or no longer needs the costly Capital Expenditures Decrease in the Number of Students with Disabilities Enrolled in the LEA Assumption of High Cost Revenue

ormer Staff Detail	
First Name	
Last Name	
Reason for Leaving	Select a Reason for Leaving
Former Salary	\$0.00
Former Benefit	\$0.00
Fund	
Function	
Project Code	
Was the position replaced?	Select a ▼

Beginning in June, make sure at least one test will be met

Maintenance of Effort for Compliance has been met						
Commonicon.	State & Local (Project 011 & 019)	Local Only (Fund 10 to 27 Transfer)	State & Local Student per Capita (Oct. 1 Child Count)	Local Only Student Per Capita (Oct. 1 Child Count)		
Comparison Difference	(\$29,741.30)	(\$72,856.48)	(\$3,371.75)	(\$50,513.82)		
	Failed (\$2,562.29)	Failed (\$45,677.47)	Met with Exceptions	Failed (\$23,334.81)		

Whoohoo! But...

It's nice when the comparison years can be next to each other, so if the LEA has any exceptions that qualify - submit them for review. Compliance is already met, but it means that any of those "failed by" tests that are met through exceptions generate a lower threshold going into the next fiscal year.

Test 1: Current Year State/Local Actual Compared to Amounts from Last Year Test 1 was Met

2022-2023 Actual State / Local Goal: \$473,277.37

Progress toward goal: 139.41% (over by \$186,527.38)

State/Local Cost Less Revenue Actual State/Local

Current Year: 2022-2023 \$659,963.59 \$158.84 \$659,804.75

Last Year Met: 2021-2022 \$552,522.71 \$10,225.69 \$542,297.02

Difference: \$117,507.73

If it looks like Test 1 is going to go way over the required amount, double check that all federal IDEA formula funds are being utilized. If not, consider moving allowed costs from local to the IDEA formula grants, in order to maintain a lower threshold.

In the example above, the LEA increased its threshold by almost \$200,000.

Items to consider moving TO the grant at year end

- Look for costs coded to Project 019 that <u>do not</u> have a project code of 382, 383, or 386. Items like non-capital equipment, supplies, professional development, employee travel, etc., are all safe bets to move.
 - Any object 38X with function 436000 should remain as Project 019
- Moving state aidable costs (Project 011) to the IDEA formula grant means that instead of getting 29 cents on the dollar, the LEA will get 100 cents on the dollar AND will have a lower operating transfer from Fund 10.
 - Consider moving volatile costs like substitute teachers / paraprofessionals
 - Specialized transportation is always a safe move

Items to consider moving TO the grant at year end

- CESA costs (Object 386) that are non-state aidable, such as those coded to:
 - 221300 / 264400 Professional Development
 - 223390 Special Education Support
 - Which would include technology services, such as SEEDS
- Avoid moving any costs that were also submitted for SBS billing (such as S/L).
 - Costs that are used for the Medicaid Staffing report can be moved to the grant, just inform the third-party biller of the change in staff funding sources.
- Avoid private vendor contracts for instruction or related services unless it is known that the vendor has valid DPI licensure.

Items to consider moving FROM the grant at year end

- Look for costs currently on the grant that are eligible for state special education categorical aid moving them to Project 011 means the LEA will at least receive some outside revenue for the costs.
 - Hold off making a final claim for IDEA formula funds until all possibilities have been exhausted:
 - Exceptions submitted
 - Verify all WISEdata Finance data is pushing correctly
 - Verify all coding is correct (all expenditures have a recognized project code)
 - Reduce the final claim by the amount needed to pass one of the four tests; make sure the ledger is updated to reflect the cost is locally funded and no longer grant funded.

Additional Technical Assistance



I'm happy to meet and discuss IDEA Maintenance of Effort!

Through my bookings site (also listed on the IDEA MOE Compliance report), we can discuss:

- Projections for FY 2023-2024 compliance
- Double-checking the figures being pushed to WISEdata Finance
- What qualifies for an exception
- Long-term planning for Fund 27 when decreases in expenditures is expected in future years.