ARP ESSER Requirement:
Maintenance of Equity



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June 15, 2022 and June 16, 2022

Agenda

- Background on MOEquity
- Components of MOEquity
- Final Requirements
- Examples of MOEquity
- Resources and Questions

Agenda

Background on MOEquity

Components of MOEquity

Final Requirements

Examples of MOEquity

Resources and Questions

American Rescue Plan: New Requirement

- Section 2004 of American Rescue Plan Act of 2021
  - –Maintenance of Equity (MOEquity)

- Condition for both states and local educational agencies who received ARP ESSER funding

- Ensure essential resources are meeting the needs of underserved groups of students

MOE versus MOEquity

MOE

Don’t reduce state and local funds for education

Expenditure Data

Looks at LEA as a whole

MOEquity

Don’t disproportionately reduce state and local funds for education

Expenditure Data

Buildings within the LEA

What is Maintenance of Equity?

- State Level MOEquity
  - Determining high-need and high-poverty districts
  - States can not do the following:
    - Disproportionately reduce per-pupil state funding to high-need LEAs
    - Reduce per-pupil state funding to high-poverty LEAs below FY19 level

- LEA Level MOEquity
  - Determining district reduction and if high-poverty buildings are at or below that reduction
  - LEA can not do the following:
    - Disproportionately reduce state and local per-pupil funding in high-poverty schools
    - Disproportionately reduce the number of FTE staff per-pupil in high-poverty schools

What is a high-poverty school?

- Number of schools within LEA / 4 = total number of high-poverty schools
- District A

Building	Poverty %
School 1	20.9
School 2	20.6
School 3	19.8
School 4	17.5
School 5	16.2
School 6	16.0
School 7	14.5
School 8	14.2

- How many high-poverty schools? What are the high-poverty schools?

8/4= 2 high-poverty schools **School 1 and School 2**

Maintenance of Equity: Exceptions

- Automatic Exceptions
  - Less than 1,000 students
  - Single Building
  - Grade spans are within a single building
- Appendix B: Certification of Exception
  - NO overall budget cuts
- U.S. Department of Education Exception
  - Experiencing a reduction of state and local funds due to an "unusual or uncontrollable" circumstance

Check-In: Exceptions

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Example- Hand Local

- 3 buildings
  - –K-5, 6-8 and 9-12
- 893 students

Check-In: Exceptions

1

Example- Auble Local

- 3 buildings
  - –K-5, 6-8 and 9-12
- 1,096 students

Check-In: Exceptions

1

Example- Comeaux Local

- 4 buildings
  - –K-6, K-6, 7-8, 9-12
- 1,482 students

Where Are We Now?

- 914 ARP ESSER subrecipients
  - –477 have less than 1,000 students
  - –8 are single schools that have more than 1,000 students
  - –233 are exempt by grade spans
  - –143 have filed Appendix B
  - –53 have to complete MOEquity for FY22
  - –The U.S. Department of Education did not grant any waivers for Ohio

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LEA Components of MOEquity

- For FY22 comparing FY22 to FY21 for:
  - Per-Pupil state and local funding
    - Determine reduction, if any at the district level and compare to high-poverty schools
  - FTE per-pupil staff
    - Determine reduction, if any at the district level and compare to high-poverty schools

Check-In

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Does an LEA have to meet both the fiscal and staffing components of MOEquity?

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Final Requirements

- Updated deadline for states to July 8, 2022
  - All others remain the same
- States are required to ensure MOEquity is being met
  - Ability to utilize data that is also used on state report cards
  - How are you going to ensure that high-poverty schools are protected?
- Clarification for LEAs:
  - "if an LEA does not maintain equity and cannot make adjustments in that year, the LEA may make adjustments to funding and FTE staffing in the next year to ensure that high-poverty schools in the LEA are treated equitably."

Monitoring

- All ARP ESSER recipients receive the following question(s) within the ESSER monitoring survey:
  - Select the most appropriate exception reason.
    - Less than 1,000 students
    - Single building
    - Grade spans are within a single building
    - Certification of Exception (Appendix B)
      - Supporting documentation
    - U.S. Department of Education exception
      - Supporting documentation
    - Did not receive an Exception
  - If a district selects, did not receive an exception, it must answer the following:
    - Please describe the method/process the LEA is taking to ensure maintenance of equity is being met.
      - Supporting documentation

Supporting Documentation Examples

- 5-Year Forecasts
- Historical report card data
- History of passing MOE
  - Note, this is not enough to show that expenditures and staff are not disproportionately impacted in high-poverty buildings
- Building level spreadsheets for expenditures and staffing
- Other applicable documents

Data and Reporting

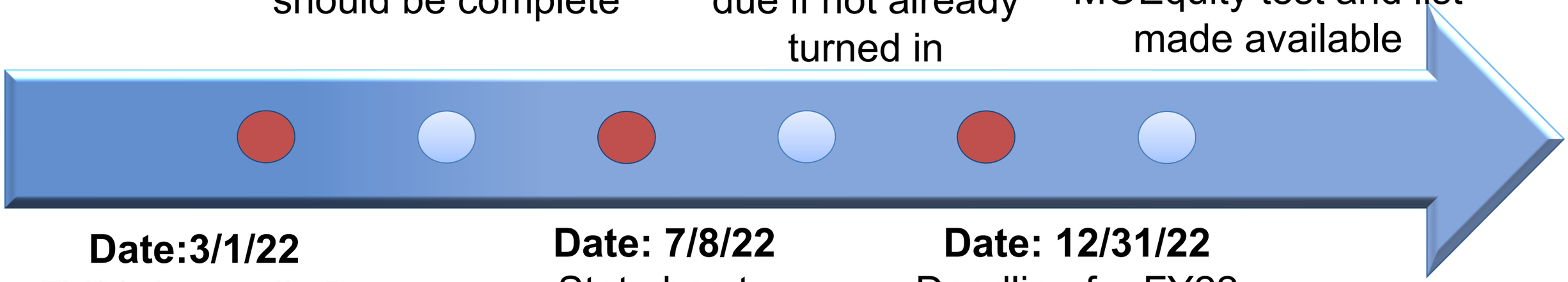
- Districts will not be required to submit anything in addition for MOEquity reporting
  - Per-pupil state and local funding will utilize EMIS data that is consistent with the report card
    - Fund codes that are 499 or less
    - Unweighted Approach
  - FTE per-pupil staff will utilize EMIS data that is consistent with the report card and other reports
    - Includes ALL staff
    - Contractors are included at the district level

MOEquity Updated Timeline

Date: 6/30/22
MOEquity monitoring should be complete

Date: 10/21/22
FY23 Appendix B is due if not already turned in

Date: 12/31/23
Deadline for FY23 MOEquity test and list made available



Date:3/1/22
FY22 Appendix B and other exceptions deadline

Date: 7/8/22
State has to publish monitoring process and exception list

Date: 12/31/22
Deadline for FY22 MOEquity test and list made available

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Example 1: Per-Pupil Funding

- May Local spent $5,000 of state and local funds per-pupil in FY21. In FY22, it spent $4,950 per-pupil. It has 1 high-poverty school.
  - District reduction is $50
- High-Poverty School 1
  - FY21: $4,990
  - FY22: $4,965
  - Reduction: $25
- May Local would pass this test for MOEquity

Example 2: Per-Pupil FTE Staff

- May Local in FY21 had 4 FTE staff per-pupil. In FY22, it had 3.5 FTE staff per-pupil. It has 1 high-poverty school.
  - –District has a reduction of 0.50 staff FTE per-pupil
- High-Poverty School 1
  - –FY21: 3.95 FTE staff per-pupil
  - –FY22: 3.55 FTE staff per-pupil
  - –Reduction: 0.40 FTE staff per-pupil
- May Local would pass this test for MOEquity

Check-In

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- Example #1

State and Local Funding	FY21	FY22	Reduction	FTE Per-Pupil	FY21	FY22	Reduction
District	$10,000	$9,000	$1,000		2	1.5	0.5
High-Poverty Building #1	$10,000	$9,500	$500		2	1.75	0.25
High-Poverty Building #2	$11,000	$9,500	$1,500		2	1.75	0.25

Check-In

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- Example #2

State and Local Funding	FY21	FY22	Reduction	FTE Per-Pupil	FY21	FY22	Reduction
District	$12,000	$10,500	$1,500		3	2	1
High-Poverty Building #1	$11,500	$10,500	$1,000		2.5	2.0	0.5
High-Poverty Building #2	$11,000	$10,500	$500		2.75	2.0	0.75

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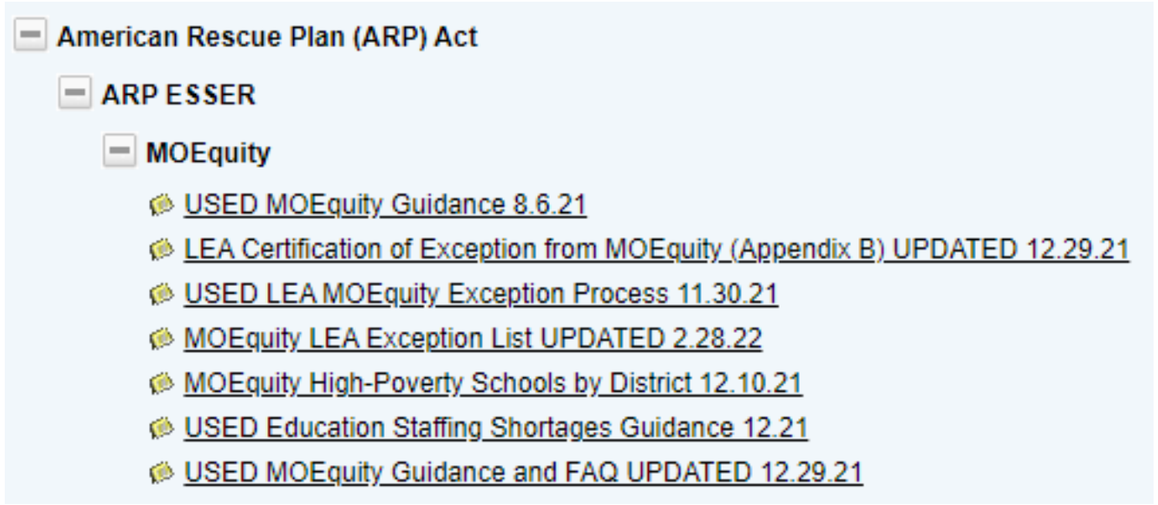
Final Requirements

Examples of MOEquity

Resources and Questions

Resources

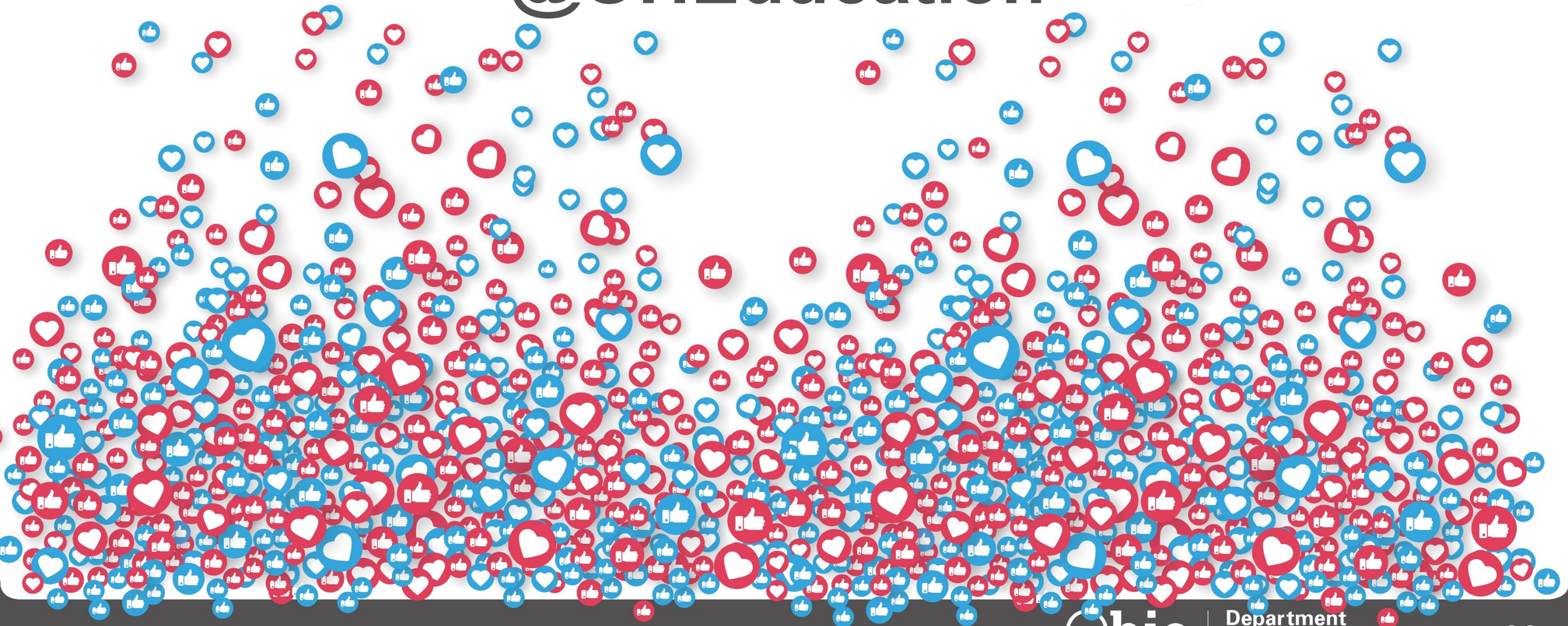
- U.S. Department of Education Final Requirements
- MOEquity Exception List
- MOEquity High-Poverty School List
- FY22 MOEquity Monitoring Process
- OFP Compliance webpage



Questions



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