



engageok | **FEDERAL PROGRAMS
SUMMIT**

Maintenance of Effort

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Topics to be discussed

- Maintenance of Effort - IDEA
- Maintenance of Effort -Every Student Succeeds Act (ESSA)
- Excess Cost

IDEA Maintenance of Effort

- IDEA 613(a)(2)(A)(iii) Funds provided to the LEA under IDEA Part B **may not** be used to reduce the level of state and/or local funds used to provide special education and related services.
- Federal requirements mandate that federal grant funds supplement (increase) not supplant (replace) existing funding for special education programs.
- LEAs must spend the same amount in total expenditures or per capita from one fiscal year to the next in local or state and local funds. 34 CFR § 300.203
- An LEA may reduce the level of expenditures according to 34 CFR § 300.204 with qualifying exceptions.

Maintenance of Effort

Exceptions:

- Voluntary departure, by retirement or otherwise, or departure for just cause, of special education or related services personnel.
- A decrease in the enrollment of children with disabilities.

Maintenance of Effort

Exceptions:

- The termination of the obligation of the agency, consistent with this part, to provide a program of special education to a particular child with a disability that is an exceptionally costly program, as determined by the SEA, because the child
 - has left the jurisdiction of the agency;
 - has reached the age at which the obligation of the agency to provide Free Appropriate Public Education to the child has terminated; or
 - no longer need the program of special education.

Maintenance of Effort

LEAs failing to then meet MOE, will be issued a citation, and reduction in State Aid funding.

Everyone loses when MOE is not met, funds leave your district and our State.

Paying the penalty does not reduce your base. You must maintain the MOE base set prior to the penalty.

IDEA MOE Calculation

- Funds 11 through 60, Excluding 12 and 41
- Project Codes 000-399 and 591
- Function Codes 1000 through 3200
- Object Codes 100 through 899
- Program Code **239**

The calculation information can be found in the Policies and Procedures section of the OCAS manual on page 53.



IDEA MOE Calculation

District Reports



District Review Sheet



District Check Report

District Check Report (May take up to 30 seconds)



District Revenue Report

District Revenue Report (May take up to 30 seconds)



District Expenditure Report

District Expenditure Report (Includes all expenditure, no exclusions)



District Expenditures Report with Exclusion

District Expenditures Report with Exclusion (Used in Per pupil Calculation)



Superintendent SPR Comparison Report



OCAS Compared To State Aid Allocations



District Maintenance of Effort Special Ed

IDEA MOE Calculation

OKLAHOMA STATE DEPARTMENT OF EDUCATION
 FINANCIAL ACCOUNTING - OCAS EXPENDITURE REPORT
 MAINTENANCE OF EFFORT FOR SPECIAL EDUCATION

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COUNTY		DISTRICT		2017-2018 OCT 1, 2017				PER CAP	2018-2019 OCT 1, 2018				PER CAP	% CHG IN EXPEND	% CHG IN PER CAP	
				EXPENDITURE	CHILD CT				EXPENDITURES	CHILD CT						
				1,009,259.19	292			3,456	720,169.97	313			2,301	(28.64)	(33.43) *	
Fund	Project	Function	Object	Program	Subject	Job	Total Exp	Fund	Project	Function	Object	Program	Subject	Job	Total Exp	
Total for 2018:							1,009,259.19								Total for 2019:	720,169.97
11	000	1000	110	239	1013	213	34,282.50	11	000	1000	110	239	1013	213	41,033.70	
11	000	1000	110	239	1024	213	37,551.27	11	000	1000	110	239	1024	213	44,953.20	
11	000	1000	110	239	1050	213	69,432.88	11	000	1000	110	239	1050	213	23,914.81	
11	000	1000	110	239	1050	213	44,450.00	11	000	1000	110	239	1050	213	39,657.45	

COUNTY		DISTRICT		2017-2018 OCT 1, 2017				PER CAP	2018-2019 OCT 1, 2018				PER CAP	% CHG IN EXPEND	% CHG IN PER CAP	
				EXPENDITURE	CHILD CT				EXPENDITURES	CHILD CT						
				724,891.63	231			3,138	885,128.04	241			3,673	22.10	17.04	
Fund	Project	Function	Object	Program	Subject	Job	Total Exp	Fund	Project	Function	Object	Program	Subject	Job	Total Exp	
Total for 2018:							724,891.63								Total for 2019:	885,128.04
11	000	1000	110	239	0000	213	12,876.60	11	000	1000	110	239	0000	213	12,587.64	
11	000	1000	110	239	0000	213	40,693.72	11	000	1000	110	239	0000	213	6,776.44	
11	000	1000	110	239	0000	213	18,229.90	11	000	1000	110	239	0000	213	72,394.83	



Maintenance of Effort

A Special Education finance specialist will work with those LEAs using the special education exceptions.

The specialist will request the LEA to submit an Expenditure Analysis or Detail Financial Analysis report using Project 000 Program 239.

NOTE: OCAS Coding Errors are not an exception to Maintenance of Effort.

Maintenance of Effort

- Districts are required to input MOE data when completing their new fiscal year LEA Agreement.
- All data information must match data submitted through OCAS.

Maintenance of Effort

https://egrantsweb.sde.ok.gov/OSDEGMSWebv02/ApplicationShell.aspx?DisplayName=Maintenance of Effort Grant Application

Maintenance of Effort

IDEA 613(a)(2)(A)(iii) Funds provided to the LEA under IDEA Part B may not be used to reduce the level of state and local funds used to provide special education and related services. Federal requirements mandate that federal grant funds supplement (increase) not supplant (replace) existing funding for special education programs. Under the new regulation beginning in FY 2015, the level of effort a local education agency must meet under section 613(a)(2)(A)(iii) of IDEA, in the year after it fails to maintain effort is the level of effort that would have been required in the absence of that failure and not the LEA's reduced level of expenditures.

Directions:

1. Enter total expenditures under the FY18 column as reported in the Oklahoma Cost Accounting System (OCAS) for Maintenance of Effort to be maintained from one year to the next.
2. Enter total expenditures under the FY19 column, as reported in the OCAS to be equal to or more than the total expenditures listed under the FY18 column for Maintenance of Effort to be maintained from one year to the next.
3. Enter total expenditures under the FY20 column as predicted to be equal to or more than the total expenditures listed under the FY 19 column for Maintenance of Effort to be maintained from one year to the next.
4. If meeting MOE requirements on a Per Capita level, enter difference under FY19.
5. If qualified Exceptions are to be used, enter amount under the FY19 column.
6. To use the 50% rule adjustment to MOE, districts must have a level one differentiated monitoring result (equivalent to a Meets Requirements). For assistance, please review Oklahoma Cost Accounting System (OCAS) annual reports online at https://sdeweb01.sde.ok.gov/OCAS_Reporting/Districts.aspx or contact your Finance Specialist.

	FY 2018	FY 2019	FY 2020
Total Expenditures	16147403.26	18214223.59	18514223.59
MOE is met by Per Capita, enter difference			
Exceptions to MOE			
50% rule Adjustment to MOE (Based on the FY19 Allocation - FY20 Allocation, if desired)			
Total	16147403.26	18214223.59	18514223.59

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[Contact Us](#)



Excess Cost

Excess Cost

Excess costs are costs that are over and above what the LEA spends on average for students enrolled at the elementary or secondary level.

Every student enrolled in a public school receives educational support, including students with disabilities.

Excess Cost

Calculation of Cost:

- Excess Cost must be computed separately for elementary school students and secondary school students. 34 CFR 300.16
- LEA's are responsible for calculating Excess Cost but the State Department is calculating Excess cost for all LEA's.
- Excess Cost Report is available on the OCAS transparency website

Excess Cost

Because a student with a disability is a student entitled to an education first, the concept of excess costs establishes that:

- Students with disabilities receive educational support like non-disabled students, and
- IDEA Part B funds only pay for the excess cost of educating students with disabilities.

Excess Cost

Districts can view their Excess Cost online through the Oklahoma Cost Accounting System.

If an LEA has not met excess cost in both elementary and secondary, the district will be issued a citation, and a reduction in State Aid funding will be imposed.

Excess Cost

- Calculation (elementary and secondary separately)
- Determine total Expenditures from all sources.
Local/State/Federal
- Deduct Capital Outlay and Debt services
- Deduct Federal Funds from IDEA part B
- Deduct Title I part A
- Deduct Title III part A & B

Excess Cost

- Deduct State and Local Funds expended for programs under IDEA part B, Title I part A and Title III parts A & B.
- Determine the APPE from the immediate prior year by dividing the amount by the Oct 1st total student enrollment in the LEA during the preceding year.

Excess Cost

Multiply the number of children with disabilities in the current years child count by the APPE determined for the previous fiscal year.

The amount must be spent in the current fiscal year.

The calculation information can be found in the Policies and Procedures section of the OCAS manual on page 54.

**OKLAHOMA STATE DEPARTMENT OF EDUCATION
EXCESS COST CALCULATION**

Funds 11-60, & 81-86 Functions 1000-5100 Object Codes 100-899- & 930		Elementary Site Codes 105-699	Secondary Site Codes 700-799
Total LEA's Special Ed Child Count in FY 2018 (Oct 1)	A	_____	_____
Total minimum amount of fund the LEA must spend for the education of children with disabilities enrolled in the LEA's schools before using IDEA Part B funds in FY 18. (current year October 1 Special Ed child count X prior year PPE)	B	\$ _____	\$ _____
State & Local Expenditures (Project Codes 000-419 and 800)		\$ _____	\$ _____
Federal Expenditures (Project Codes 420-799)		\$ _____	\$ _____
Total Expenditures		\$ _____	\$ _____
Minus Capital Expenditures (Object Code 700 Series)		\$ _____	\$ _____
Minus Debt Services (Function Code 5100)		\$ _____	\$ _____
Total Net Expenditures		\$ _____	\$ _____
Deductions:			
IDEA, Part B (Project Codes 613-642)		\$ _____	\$ _____
Title I, Part A (Project Codes 511-519)		\$ _____	\$ _____
Title III, Part A & B (Project Codes 571-572)		\$ _____	\$ _____
State/Local Title I, Part A, and Title III, Part A & B (program code 410, 424-429)		\$ _____	\$ _____
State/Local Special Education (Program Codes 239)		\$ _____	\$ _____
Total Deductions		\$ _____	\$ _____
Total Expenditures Less Deductions	C	\$ _____	\$ _____
Current Year ADM	D	_____	_____
Total Expenditures Divided by ADM	E	\$ _____	\$ _____
Other Expenditures for the Education of Children with Disabilities	A x E	\$ _____	\$ _____
Expenditures From All Other Funds Except IDEA B ("from deduction above")		\$ _____	\$ _____
Total Spent on Special Ed Students	F	\$ _____	\$ _____
Difference	F - B	\$ _____	\$ _____
Total LEA's Special Education Child Count in FY 2019 (October 1)	G	_____	_____
Total minimum amount of funds the LEA must spend for the education of children with disabilities enrolled in the LEA's schools before using IDEA Part B funds in FY2019. (Current Year October 1 Special Education County X PPE)	E x G	\$ _____	\$ _____

Expenditures coded to site code 050 are divided by ADM and distributed by the amounts listed in the elementary and secondary columns.

Maintenance of Effort / Excess Cost

IDEA contains two separate requirements for LEAs to ensure sufficient funding for special education programs:

- Maintenance of Effort (MOE)
- Excess Cost

While these requirements have some similarities, there are separate requirements requiring separate calculations.

Maintenance of Effort under ESSA Section 8521

ESSA MOE

(a) IN GENERAL- A local educational agency may receive funds under a covered program for any fiscal year only if the State educational agency finds that either the combined fiscal effort per student or the aggregate expenditures of the agency and the State with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year.

ESSA MOE

(b) REDUCTION IN CASE OF FAILURE TO MEET-

(1) IN GENERAL- The State educational agency shall reduce the amount of the allocation of funds under a covered program in any fiscal year in the exact proportion by which a local educational agency fails to meet the requirement of subsection (a) of this section by falling below 90 percent of both the combined fiscal effort per student and aggregate expenditures (using the measure most favorable to the local agency). If such requirement (as determined using the measure most favorable to the local agency) for one or more of the five immediately preceding fiscal years.

(2) SPECIAL RULE- No such lesser amount shall be used for computing the effort required under subsection (a) of this section for subsequent years.

ESSA MOE

(c) WAIVER- The Secretary may waive the requirements of this section if the Secretary determines that a waiver would be equitable due to:

(1) exceptional or uncontrollable circumstances, such as a natural disaster or a change in the organizational structure of the LEA; or

(2) a precipitous decline in the financial resources of the local educational agency.

ESSA MOE Calculation

- Total Expenditures plus federal COOP Inputs
 - Funds 11 through 60, Excluding 12 and 41
 - Function Codes 1000 through 3200
 - Object Codes 100 through 899
- Deductions
 - Adult Education Expenditures
 - Community Services
 - Capital Outlay
 - Payments to LEA's
 - Federal Funds (not including Impact Aid)
 - Student Activities

ESSA MOE Calculation

- Inputs

 - Teacher Retirement

 - Career Tech

 - Co-op Funds

- Net Current Expenditures

 - Must be matched by 90% from year to year.

ESSA MOE Calculation

- Three ways to Calculate Maintenance of Effort.
 - Expenditures
 - Average Daily Attendance Per Student Expenditure
 - October 1 Enrollment Per Student Expenditure

REMEMBER WITH ESSA

Maintenance of Effort and Supplement vs Supplant are different.

You can meet MOE and Not meet the ESSA definition of Supplement vs Supplant

REMEMBER:

IDEA MOE is for only Special Education Local and

State Expenditures

and

ESSA MOE is overall Local and State Expenditures

OCAS CODING IS VERY CRITICAL

Revenue and Expenditures that are uploaded to the OCAS System in the Single Sign-On System determines if your district is in compliance with Federal Laws.

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