Safety Net Training

2019–20
What is Safety Net?

• Funding available to Local Education Agencies (LEAs) that show need for additional special education funding.

• Two types of Safety Net funding:
  • High-Need Individual – Based on individual student need. Costs associated with services from the Individualized Education Program (IEP) must exceed established threshold.
  • Community Impact – A LEA factor that is beyond the control of the LEA which justifies disproportional and extraordinary costs associated with the provision of special education services.
## Important Dates

<table>
<thead>
<tr>
<th>Deadline for Receipt of Application at OSPI</th>
<th>Type of Application</th>
<th>Oversight Committee Meeting Date</th>
<th>Meeting Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>March 13, 2020</td>
<td>High-Need Individuals (HNI)</td>
<td>June 17–18, 2020</td>
<td>TBD, check OSPI website</td>
</tr>
<tr>
<td>May 8, 2020</td>
<td>HNI (Updates Only) and Community Impact (CI)</td>
<td>June 17–18, 2020</td>
<td>TBD, check OSPI website</td>
</tr>
<tr>
<td></td>
<td>Final Verification &amp; Award Meeting</td>
<td>August 12, 2020</td>
<td>TBD, check OSPI website</td>
</tr>
</tbody>
</table>
May 8 Deadline

• **Only** intended for:
  • Community Impact applications
  • High-Need Individual applications for:
    • Students enrolling in the LEA after the March 13, 2020 submission deadline.
    • Students with a significant change in services or placement.
    • Students accessing Extended School Year (ESY) when the ESY decision is made after the March 13, 2020 submission date.
Bulletin and Forms


• Available:
  • Bulletin
  • Worksheet A (with some data)
  • Worksheet C
  • Certification and Individuals Summary
  • Community Impact

• Not Available:
  • Transportation Cost Calculator (will be available mid-February)

• Sign up for GovDelivery Safety Net updates: https://public.govdelivery.com/accounts/WAOSPI/subscriber/new?topic_id=WAOSPI_366
New this year!

- Threshold: $29,707

- Draft LEA Summary will be provided to all applicants prior to the 9 am start of the June 18th and August 12th meetings.
  - Zoom will be open to all applicants.
  - Let OSPI know if you plan to attend in person.

- If ESY paperwork submitted with application is for previous school year, applicants will have an opportunity to submit the current year extended school year (ESY) paperwork when submitting ESY certification in July.

- Proration of IEP costs when the IEP does not meet requirements.
New this year!

• Worksheet C has a new layout and some additional features.
• Only one Worksheet C template is posted. This Worksheet will have cost calculation tabs for up to four previous IEPs.
• A reconciliation worksheet is built into the Worksheet A template. This will provide applicants an opportunity to explain differences in budgeted and annualized expenditures.
Safety Net Timeline

- **October 2019**
  - Bulletin and most Forms Released

- **October – December 2019**
  - Training provided at ESDs
  - OSPI training videos created

- **January – March 2020**
  - OSPI provides assistance to LEAs as they work on applications.

- **March 13, 2020**
  - High-Need applications due

- **March – June 2020**
  - OSPI reviews applications fiscally
  - IEPs are reviewed by Committee
  - LEA financial documents are reviewed by Committee
Safety Net Timeline

May 8, 2020
- Community Impact applications due
- High-Need individual updates due

June 2020
- Committee meets and votes on conditional awards (17th-18th)
- OSPI sends letters to applicants detailing conditional award and additional information needed to complete final verification.

July 2020
- Reconsideration window
- Applicants submit final verification data
- OSPI uses applicant data to verify capacity

August 2020
- Committee meets to make final award recommendations (12th)
- State/Federal split is calculated once total award amount are known
- Letters go out to applicants detailing final award

September 2020
- Survey goes out to applicants
- Work begins on application for 20-21
Certification

• When submitting a Safety Net application, the LEA certifies that they understand that:
  • Costs attributable to LEA philosophy, service delivery choice, or accounting practice are not a legitimate basis for safety net funding.
  • Funding is not an entitlement, is subject to adjustment and recovery, and may not be available in future years.
  • The costs associated with educating a high-need student with a disability, are only those costs associated with providing direct special education and related services.
  • The applicant LEA’s program is operated in a reasonably efficient manner.
Certification

• The applicant is making a reasonable effort to provide appropriate services for students in need of special education using all available state and federal special education funding formulas and program income generated by program activities.
• Federal safety net funding provided under 34 CFR § 300.704 (c) local education agency high cost fund cannot be used to pay costs that otherwise would be reimbursed as medical assistance for a student with a disability under the State Medicaid program under Title XIX of the Social Security Act.
• The LEA has no unresolved audit issues related to special education that are material to the application including program audit, single audit, or any special purpose audit.
Other Interested Parties

• Safety net applications are also subject to whistleblower requests, audit by the State Auditors Office, public disclosure requests, Program Review, and Citizen Complaint verification.
Worksheet A

• Submitted with both High-Need Individuals and Community Impact applications.
• Currently prepopulated with 19-20 F195 (budget) data.
• 18-19 F196 (year-end) data is available, working on updating Worksheet A to repost to the website.
• The preparer enters data in the green highlighted cells, if applicable.
• The Worksheet compares Special Education expenditures and revenues.
• If Special Education expenditures exceed revenues, the applicant will demonstrate need for a Safety Net award.
High-Need Individuals: Worksheet C

- Used to cost out services in the IEP
- Relies on quantification of services in the IEP
- Data needed to complete:
  - Number of days in the school year
  - Student demographic data (birthdate, disability, grade, eval and IEP dates)
  - Teacher base salary and November caseload information
  - Classified staff hourly rates
  - Base salary and contract hours for related service providers
  - Hourly rate for contracted staff
  - Minutes per week (from IEP) student is served by staff (direct service minutes only)
High-Need Individuals: Medicaid

• If your LEA bills for Medicaid and student is Medicaid eligible:
  • Complete the Medicaid Reimbursement Calculator within the Worksheet C.
  • If the student is receiving services from a provider who is not eligible, OSPI will have a form for the LEA to complete that the provider will need to sign.

• If your LEA is in the process of setting up Medicaid billing:
  • Complete the Medicaid Billing Implementation form and submit with application.

• If your LEA does not bill for Medicaid and is not in the process of setting up Medicaid billing:
  • Per WAC 392-140-60120 there will be an adjustment for LEAs not billing for Medicaid.
High-Need Individuals: Unallowable Costs

• The following are costs that are not eligible for Safety Net funding. This list is not exhaustive.
  • Construction costs
  • Costs not coded to a special education program (21, 24, 26, 29)
  • Consultant costs (not direct service to the student)
  • Teacher training
  • Parent travel to a residential placement
  • Provider travel to and from work (bus paras traveling with student are allowable)
High-Need Individuals: IEP Reviews

• If your LEA has had a WISM review that included a file review in the past two years or the current year:
  • Safety Net review will not include IEP review. But, still include the IEPs for each application for records.
  • 17-18, 18-19, or 19-20

• If your LEA has not had a WISM review in the past two years:
  • Sample of IEPs from your current submission will be selected for review. Include IEPs with all applications.
  • Costs associated with each application will still be reviewed.
High-Need Individuals: IEP Reviews

• IEP reviews will focus on the following areas of the current IEP developed by a team of required members:
  • Measurable Annual Goals (MAGs)
  • Summary of Service (matrix)
  • Signed Emergency Response Protocols (ERP)
  • Behavior Intervention Plans (BIP)
  • Overall transition components, including Courses of Study and Postsecondary Goals, as well as the High School and Beyond Plan (HSBP)
High-Need Individuals: Sampling Method

• Based on the number of applications submitted.
• 40% of applications submitted will be reviewed, if applicant submits at least 5 applications.
• If 5 or fewer applications are submitted, all applications will include an IEP review.
High-Need Individuals: Prorating

• If an IEP does not meet requirements, the application will be prorated.

• For each area identified, the application will be prorated by 15%.
  • 1 area: 85%
  • 2 areas: 70%
  • 3 areas: 55%

• If four or more areas are identified, the application will not receive any funding.
High-Need Individuals: What to Include

- Worksheet A and supporting documents
  - Expenditure reports
  - Reconciliation (within Worksheet A)
  - Exception reports (October – March)
- Worksheet C and supporting documents
  - IEPs in effect for the school year
  - Transportation calculator, if applicable
  - POs, contracts, and invoices
  - Medicaid forms for LEAs in process of implementation or providers who are not eligible to bill
- Certification and Individuals Summary
- Calendars – for your LEA and any out of LEA placement (1 copy)
High-Need Individuals: May 8 Deadline

• Submit:
  • Updated Worksheet Cs (or new worksheets for new applications)
  • The student’s new IEP or IEP amendment
  • Any POs, contracts or invoices applicable to the adjustment
  • A Certification and Individuals Summary that only includes the applications included in the updated request.
Community Impact

• Applications are due May 8.
• LEAs above the 13.5% funding index with identified and quantifiable factor(s) beyond the control of the LEA which justify disproportional and extraordinary costs associated with the provision of services to students with disabilities may receive funding.
• Community Impact applications cannot include students for whom the LEA is receiving state special education funding (e.g., LEAs below the 13.5% cap).
• All state funding (Revenue 4121).
Community Impact: Identify Factor

1. Make assertion. Identify the demographic, environmental, sociological or other factor(s) that supports the LEA’s assertion that for the 2019–20 school year the LEA is financially impacted by the presence of such factor(s).

• Example:
• The LEA is disproportionately impacted with students eligible for special education who are placed in foster care facilities/homes within the boundaries of the LEA.
2. Present student enrollment data, including SSID numbers, attributed to the factor. Provide appropriate comparisons to surrounding LEAs or LEAs of like size throughout the region or state, and statewide data to demonstrate that the LEA has a unique situation that is not the result of LEA philosophy, service delivery choice or accounting practice.

• LEA data may include:
  • LEA enrollment
  • Special education enrollment (K–21)
  • Special education percentage
  • Number of students in foster care receiving special education services
  • Number of students in foster care receiving special education services above the anticipated number
Community Impact: Quantify

3. Quantify the extent to which the identified factor(s) in Step One creates an extraordinary documentable fiscal impact upon the LEA’s state funded Special Education Program.
Community Impact: Quantification
Example

### 2019-20 Special Education/Foster Student Analysis for LEA

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>a</td>
<td>April 2020 BEA Resident FTE Enrollment (K–12)</td>
</tr>
<tr>
<td>b</td>
<td>Age K–21 Resident Special Education Enrollment</td>
</tr>
<tr>
<td>c</td>
<td>Age K–21 Special Education Percent (\frac{b}{a})</td>
</tr>
<tr>
<td>d</td>
<td>Funded Age K–21 Special Education Percentage</td>
</tr>
<tr>
<td>e</td>
<td>Funded Age K–21 Resident Special Education Enrollment (a \times d)</td>
</tr>
<tr>
<td>f</td>
<td>Unfunded Age K–21 Special Education Enrollment (b - e)</td>
</tr>
<tr>
<td>g</td>
<td>Anticipated number of students in foster care for the LEA (a \times 0.006)</td>
</tr>
<tr>
<td>h</td>
<td>Anticipated number of students with disabilities in foster care receiving special education services (b \times 0.006)</td>
</tr>
</tbody>
</table>

### Cost Calculation

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>i</td>
<td>Number (FTE) of confirmed students with disabilities in foster care receiving special education services</td>
</tr>
<tr>
<td>j</td>
<td>Number (FTE) of students in application associated with disproportional impact in the LEA (i - (b \times 0.006))</td>
</tr>
<tr>
<td>k</td>
<td>Special education allocation ((\text{BEA Rate} \times 0.995) - \text{Fed Funds Integration Rate}))</td>
</tr>
<tr>
<td>l</td>
<td>Fiscal impact of students with disabilities in foster care receiving special education services (j \times k)</td>
</tr>
<tr>
<td>m</td>
<td>Recommended funding based on LEA’s request</td>
</tr>
</tbody>
</table>
Community Impact

• Successful applicants demonstrated capacity and identified and quantified a specific factor that created a disproportional representation of students with disabilities receiving special education services causing an adverse fiscal impact.

• Some examples – Military Bases, group homes, foster care, residential facilities.
What to Include: Community Impact

• Worksheet A and supporting documents
  • Expenditure reports (April)
  • Reconciliation (within Worksheet A)
  • Exception reports (October – April)
• Community Impact Application
• Certification
How to Submit

• Through secure file transfer protocol site.
• Both High-Need Individual and Community Impact applications should be submitted via SFTP site.
• Contact safety.net@k12.wa.us if you need an accommodation to this submission method.
Secure File Transfer Protocol

• We recommend the free version of Core FTP. To download go to: http://www.coreftp.com/download.html

• A user guide is available here: https://www.k12.wa.us/sites/default/files/public/specialed/finance-grants/safetynet/sped-sftp-user-guide.pdf

• Contact safety.net@k12.wa.us if you do not have a user name and password.

• Work with your IT department to install this software if you do not already have it.

• LEA must transfer files to OSPI through the STFP by 5 p.m. on the deadline date.
File Structure

• Within your LEAs folder in the SFTP site:
  • Folder with fiscal components of the application
  • A folder for each student application
    • Worksheet C (in Excel format)
    • Any other applicable worksheets (Transportation)
    • IEPs – label with SSID and current or previous
    • Purchase orders, contracts, and invoices (if applicable) specific to the student.

• A folder with shared POs, contracts, and invoices.
  • This would be used for those related service providers (SLP, OT, PT, etc.) who serve multiple students who are submitted for Safety Net.
Additional Training Opportunities

• We will be adding some mini tutorials on the website.
• If you’d like to set up a time to review your 18-19 application, or if you’d like one on one help with your application, email safety.net@k12.wa.us.
Questions?

• Amber O’Donnell, Sarah Kahne, and Jess Inocencio are here to help!

• Contact:
  • safety.net@k12.wa.us
  • 360-725-6075