

### **Frequently Asked Questions**

# Achievement and Integration Program Minn. Stat. § 124D.861-124D.862 Minnesota School Desegregation/Integration Rules, part 3535.0100-0180

This list of Frequently Asked Questions (FAQ) is based on questions submitted to the agency. Its purpose is to provide additional information on basic program parameters to the general public and to school districts participating in the Achievement and Integration (A&I) program.

For additional assistance, please call the Minnesota Department of Education's (MDE) Office of Equity and Opportunity at 651-582-8462 or email mde.integration@state.mn.us.

### **Frequently Asked Questions**

### What is the purpose of this program?

This program was established to increase racial and economic integration of students and to increase student academic achievement by reducing academic disparities based on students' diverse racial, ethnic, and economic backgrounds.

### How does a district apply to be in the Achievement and Integration (A&I) program?

Districts do not apply to participate in the A&I program. Instead, districts are notified by the commissioner of education that they are either required or eligible to be in the program based on their annual fall enrollment data.

### What process does the Minnesota Department of Education (MDE) use to identify districts to participate in the A&I program?

MDE determines which school districts participate by comparing adjoining districts' percentage of enrolled protected class students. It also compares the percentage of enrolled protected class students at schools within the same school district.

Each year, the commissioner analyzes fall enrollment data from every district to look for these racial enrollment disparities between districts and between schools. When the difference between a district's percentage of enrolled protected students is more than 20 percent higher when compared with at least one of its adjoining districts, the district with the higher percentage is considered *racially isolated* (RI).

When the difference of enrolled protected students at a school is more than 20 percent when compared to the district's average for students in the same grade levels, the school with the higher percentage is considered a racially identifiable school (RIS).

Districts that are racially isolated or have a racially identifiable school are required to be in the A&I program. At least one of the racially isolated district's adjoining districts must also participate and partner with the racially isolated district on cross-district integration strategies for students from both districts.

Once annual enrollment data has been confirmed, the commissioner notifies the district that it must be in the A&I program and develop a plan to increase achievement outcomes and decrease racial and economic enrollment disparities. This process for identifying districts and schools is included in Minnesota Rules, part 3535.0110, subpart 6 and subpart 7.

### What does the phrase "protected class students" refer to?

When determining which districts are eligible for this program, *protected class* students means students who self-report as being in one of the race and ethnicity categories used by school districts and MDE to track student enrollment. These categories are African/Black Americans, Asian/Pacific Americans, Chicano/Latino Americans, American Indian/Alaskan Native, and multi-racial.

### Which districts are required to be in the Achievement and Integration program?

Racially isolated districts and districts with racially identifiable schools are required to be in the program. The commissioner notifies districts that physically adjoin a racially isolated district that they are eligible to participate in the A&I program. Under Minnesota School Desegregation/Integration Rules (Minn. R. 3535.0110-0180), a racially isolated district must work with at least one adjoining district to implement cross-district integration strategies for students.

### Are intermediate districts able to participate in the program?

Intermediate districts are not included in eligibility calculations for the Achievement and Integration program for the following reasons:

- 1. The schools that intermediate districts provide are excluded by Minnesota School Desegregation Rules, part 3535.0110, Subpart. 8: ALCs, special education sites and treatment facilities.
- 2. The revenue formula describes adjusted pupil units, which intermediate and joint powers districts do not have. There is also a levy component to A&I revenue, which is limited for intermediate districts.
- 3. To determine eligibility, the rules require a comparison of percentage of enrolled protected students to those in contiguous districts. Intermediate districts are comprised of multiple member districts so their boundaries would encompass many districts and prevent any meaningful comparison.

### Once the Minnesota Department of Education notifies a district that it is eligible for this program, what does the district have to do?

Participating districts must develop and submit an A&I plan aligned with the purpose of the program. For racially isolated and adjoining districts, the plan must be completed twelve months after notification from MDE. For districts with a racially identifiable school, the plan should be completed six months after notification or by the end of the school year, whichever is longer.

MDE staff work with districts to meet plan requirements. One of the requirements includes getting community input when developing the A&I plan (see the information on multidistrict collaboration and community collaboration councils below). The A&I plan template is available on the MDE website.

Districts receive funding to implement strategies in their A&I plans. To receive Achievement and Integration revenue, a district must submit a budget to MDE by March 15 every year. These budgets must align with requirements included in the <u>Achievement and Integration Budget Requirements</u> available on the MDE website.

The Minnesota School Desegregation/Integration Rule requires districts to establish groups for providing input on new Achievement and Integration (A&I) plans. The Minnesota Department of Education recommends that districts convene a leadership team for their A&I programs. Don't these two groups serve the same purpose?

No, these groups serve different purposes.

Districts are strongly encouraged to establish a leadership team for their A&I programs. The role of this leadership team is to develop and actively manage the district's A&I program as it is implemented over the course of three years.

The Minnesota School Desegregation/Integration Rule requires districts to convene councils to provide input on A&I plans. The intent is to ensure that A&I plans reflect the diverse perspectives of school-specific or district-wide communities.

The type of council a district convenes depends upon how the district qualifies to be in the program:

- Racially isolated and adjoining districts must establish a multidistrict collaboration council (MDCC). This MDCC provides input to help districts establish integration goals and cross-district integration strategies for districts' A&I plans.
- Districts with a racially identifiable school (RIS) are required to convene a community collaboration council (CCC) to assist in developing integration goals and to identify ways of increasing racial and economic integration at the RIS.

Membership for both of these councils should reflect the diversity of the participating districts or the RIS community. An American Indian Parent Committee representative must be included in an MDCC and CCC if the district has such a committee.

#### Do Achievement and Integration strategies have to allow participation of all students?

Achievement and integration strategies can target participation of specific student groups, but districts must allow and encourage participation of students or family members from all racial, ethnic, and socioeconomic backgrounds.

Achievement and integration revenue may not be used for activities that have race-based admission or that have the effect of segregating students by race, ethnicity or socioeconomic status. This is important given the purpose of this program: to increase racial and economic integration rather than create or sustain programs that segregate students. Strategies should be designed and implemented to benefit all students regardless of their racial, ethnic, or socioeconomic background, rather than meet the needs of a single student group.

#### Can we include culturally specific programming in our Achievement and Integration plans?

Achievement and Integration revenue may be used to fund activities that promote understanding of various cultures and that bring students of different racial and ethnic backgrounds together. For example, Achievement and Integration revenue could fund an Ojibwe language summer program that is promoted to and enrolls students from a variety of racial, ethnic and socioeconomic background. Such a program would bring students together on a regular, ongoing basis to learn from and work with each other and increase all students' awareness and understanding of American Indian culture.

Achievement and Integration legislation says that one purpose of the program is to create equitable educational opportunities. How is this related to providing culturally responsive classroom instruction and programming if most of the students in my classroom are white?

Culture is a central component to teaching and learning. Culture affects how people think, communicate, interpret the world, solve problems and make decisions. It is important for students and teachers of all backgrounds to develop cross-cultural competence and understanding of cultural differences. It is just as important for white students to learn about difference as it is for students of color who must navigate systems of difference on a regular basis. An equitable education means teaching all students the value of multiple perspectives, critical thinking skills, and the ability to build relationships with others who don't look like them, believe the same things they do, or live in their neighborhoods or communities. This is a critical aspect of integrated schools.

Adjoining and voluntary districts are in the A&I program to work with *racially isolated districts* on increasing opportunities for racial and economic diversity and integration. The A&I program provides districts the opportunity to build cross-cultural relationships and create shared learning opportunities for students of color and white students from the racially isolated and adjoining districts. Providing these opportunities for increased student interaction is one aspect of fulfilling districts' responsibility to provide an equitable education for each student.

#### Can our Achievement and Integration plan include strategies that my district is already implementing?

Achievement and Integration revenue may fund new strategies and supplement existing ones funded with other revenue. You can use your Achievement and Integration plan to supplement initiatives your district already has in place if those strategies help increase integration and decrease achievement disparities.

You cannot simply add programs, initiatives or staff positions to your Achievement and Integration plan if your district is already implementing them. Instead, think about how your plan can expand the scope of current efforts by increasing their capacity to reduce disparities and increase racial and economic integration.

#### What are the reporting requirements for districts in the Achievement and Integration program?

At its annual World's Best Workforce meeting, a school board must publicly report on its progress toward its Achievement and Integration (A&I) plan goals. The board must provide longitudinal data demonstrating its progress in the A&I goal areas: 1) reducing the disparities in student academic performance, 2) increasing racial and economic diversity and integration, and 3) increasing equitable access to effective and diverse teachers. (See Minn. Stat. § 124D.861, Subd. 3b.)

At least 30 days before the meeting, the school board must post its plan, a preliminary analysis, relevant student performance data, and other longitudinal data on the district's website.

Districts also submit an annual progress report to MDE in order for the commissioner to evaluate each A&I plan at the end of its three-year cycle.

### Can a school district make changes to its Achievement and Integration plan after it has been approved by MDE?

A district's MDE-approved A&I plan is the guiding document for a district's A&I efforts and use of revenue. If done well, the plan is based on a careful analysis of data that identifies and prioritizes student needs. All plans are meant to remain in place for three years. For these reasons, frequently changing strategies or expanding the scope of an MDE-approved A&I plan is not encouraged.

Approved plans may be modified in the following situations:

- When there are unanticipated changes in funding, in availability of staff or other resources critical for implementing strategies in approved plan; or
- When the proposed changes are based on an analysis of relevant data that identifies critical student needs not reflected in the current plan; and
- When it becomes evident as a result of continuous improvement efforts that a strategy or goal needs to be revised.

Here are the key things to consider for plan amendments:

• Changes should be supported by a needs assessment and be based on a review of relevant data.

- Changes to strategies should align with the plan's existing goals and the district's Worlds Best Workforce plan: how does the proposed change aligns with the scope of these two plans?
- Changes can build on existing strategies by adding a related initiative or activity. That is, a
  district may amend its plan by adding a strategy which somehow expands on an existing one.

### What if our school board doesn't approve our A&I plan until after the March 15 deadline for submitting plans and budgets to MDE?

The March 15 deadline is stated in legislation and does not change from year to year. A district should use this date when setting their timeline for getting school board approval for its three-year plan.

School board approval is not required for annual A&I budgets.

### Is Achievement and Integration revenue provided through a grant?

Achievement and Integration revenue is not administered as a grant. It is a 70 percent aid, 30 percent levy appropriation. A&I aid payments are made to districts through the state's education IDEAS aid system.

### How does a district know how much Achievement and Integration revenue it is eligible to receive?

Achievement and Integration aid estimates are reported in the Minnesota Funding Reports (MFR) section of MDE's Data Reports and Analytics website. Step-by-step directions to these reports are listed on the Achievement and Integration web page.

School Finance staff can provide detailed information on levy or aid estimates and the process for reporting levy information. You may call MDE School Finance staff at 651-582-8779 or email <a href="mailto:mde.funding@state.mn.us">mde.funding@state.mn.us</a>.

Finally, it's important to know that the amount of A&I revenue any district receives is based on the lesser of the following three things:

- 1. The maximum amount of revenue a district is eligible to receive based on its *actual* rather than *estimated* fall enrollment data,
- 2. The amount of revenue approved by MDE during its annual review of budgets submitted by districts, or
- 3. A district's actual expenditures as reported in its final annual Uniform Financial Accounting and Reporting Standards (UFARS) report.

Aid estimates included in the Minnesota Funding Reports (MFR) are updated with actual enrollment data in January. School district staff should check their district's MFR to see if their aid estimates have changed.

### Is pre-K enrollment data included in a district's annual Achievement and Integration revenue estimate and can a district fund pre-K costs with that revenue?

Yes, MDE uses pre-K through 12th grade enrollment data to determine districts' estimated and updated annual revenue amounts. Legislation allows these funds to be used for pre-K through grade 12 learning environments

that include "enrollment choices" (see Minn. Stat. § 124D.861 Subd. 1 (c)). Given this, A&I revenue may be used for allowable costs at a pre-K program that offers school enrollment choices.

Allowable costs include those related to policies, curricula, or new positions (trained instructors, administrators, counselors, and others) which support magnet programming, research-based instruction, differentiated instruction, or targeted strategies to improve achievement or reduce racial and economic enrollment disparities (Minn. Stat. § 124D.861 Subd. 1 (c)).

Pre-K programs must be included as a strategy in the district's A&I plan and provide school enrollment choices that will increase integration between schools within a district or between adjoining A&I districts.

## Are all pre-K students (state and district funded) included in the racially isolated school calculation, or only state funded pre-K?

MDE doesn't distinguish between state and federally funded pre-K programs, but include counts of all pre-K through 12 students enrolled in a public school even if they are not otherwise eligible to generate state aid.

#### Can districts use their Achievement and Integration revenue across fiscal years?

There is no carryover of A&I revenue from one fiscal year to the next. Districts must expend their revenue by June 30 of the fiscal year for which their budget was approved in order to receive aid payments for the amount expended. In other words, expenditures of this revenue must be made between July 1 and June 30 of the same fiscal year.

A district will receive aid payments based on the amount it expended during a fiscal year if that amount is less than the amount of revenue approved for its budget during MDE's annual budget review, or less than the amount the district is eligible to receive based on actual student enrollment for that fiscal year—that is, if the amount expended is the lesser of these three amounts.

#### Can Achievement and Integration revenue be used to fund mini-grants?

This revenue may be used for teacher mini-grants included as a strategy in a district's MDE-approved A&I plan and aligned with the state's A&I program goals. The plan must explain how the district will determine whether accepted mini-grants proposals are aligned with the goals in its plan.

A district should be able to document its mini grant approval process, actual grant awards, and the impact of the mini grant activities.

### Can a district use Achievement and Integration revenue for staff salaries?

There are two things to consider:

- 1. A district may use A&I revenue only for costs associated with implementing strategies in its MDE-approved plan.
- 2. A district may fund positions proportionate to the amount of time those positions are directly involved with implementing strategies in its A&I plan.

Here's an example: a district's MDE-approved plan includes a new tutoring program designed to reduce academic disparities between specific student groups. The tutoring program is new will require .2 time of a full-time teaching position. This means that .2 of that person's salary may be funded with A&I revenue.

Another thing to keep in mind to avoid supplanting is that A&I revenue may not be used to fund existing positions unless staff in those positions are taking on new responsibilities created for strategies or activities in a district's A&I plan.

In other words, districts may not simply replace one funding source (e.g., other types of categorical aid, federal grants, general education revenue, or any other) with A&I revenue. This would be supplanting and would not be allowed.

The Achievement and Integration (A&I) budget requirements say that A&I revenue may not be used to make ongoing purchases of technology, but may be used only to purchase technology required to implement a new A&I strategy. What does that mean?

Districts may purchase technology when it is essential for the success of a strategy being implemented for the first time. Once that strategy is up and running, a district may not use A&I revenue to purchase additional technology beyond that start-up purchase.

### May a district continue to purchase software after making an initial purchase for a new strategy?

Yes, a district may purchase additional software or renew software licenses. Like all other types of expenditures, it must be clear how software supports one or more strategies in a district's A&I plan. Hardware purchases will be limited to an initial purchase for a new strategy.

### Some requests to use Achievement and Integration revenue for memberships to professional organizations are allowable and others are not. Why is this?

Allowable memberships are those that directly benefit or support one or more A&I plan strategy and are specific to the district's A&I plan. For example, a membership fee for a business manager's association is not specific to an A&I program but supports district-wide efforts. A membership fee to a national organization supporting culturally relevant teaching is more likely to be specific to an A&I plan strategy and could be approved if the accompanying explanation makes this connection clear.

Districts are required to provide such explanations—referred to as budget narratives—in their annual A&I budgets. The budget narrative for a proposed membership fee must explain how the membership directly supports and is specific to an A&I strategy.

### What is the indirect cost rate for Achievement and Integration budgets?

There isn't an indirect cost rate established for these budgets. The legislation that covers A&I revenue policy simply allows school districts to spend up to 10 percent of their A&I funds on administrative related costs. Those funds aren't a specified amount given to districts in exchange for running an A&I program; in other words, that 10 percent of a district's budget isn't simply given to a district because they qualify to receive the funding.

Instead, districts are asked to explain what administrative costs they might reasonably incur as a result of implementing their A&I program. If those costs align with those that are allowable, they may be approved when MDE reviews their budget.

Indirect cost rates are associated with grant-based program. Achievement and Integration funds are not awarded as grants. Rather, the revenue is a forecast aid appropriation. The administrative costs for A&I are not managed as they are with federal grants.

### Do partnering Achievement and Integration districts need to submit their own plans and budgets?

In nearly all instances, districts that are partnering with their adjoining A&I districts do not need to create a common plan or budgets. Instead, cross-district strategies being implemented by two or more adjoining districts should be listed in each district's respective A&I plan.

Payments to an integration fiscal host or collaborative should be listed as line items within a district's annual budget. There are more details on this in the <u>Achievement and Integration Budget Guide</u> available on MDE's website.

An exception to this occurs when multiple partnering districts contribute 100 percent of their A&I revenue to a single fiscal host. In this situation, it may make sense to have a common plan and budget that each member district approves and uses as its sole A&I plan or budget.

### How does a group of partnering Achievement and Integration districts receive revenue to run programs for its member districts?

State aid payments are made to districts, not to a designated fiscal host or other entity facilitating student integration activities or professional development for A&I districts. A district may use some of its A&I aid to purchase services from another district or from an organization if the services purchased are allowable uses of revenue included in the A&I statute. Details on how to include this type of expenditure in a district's A&I budget are provided in the Achievement and Integration Budget Guide posted on MDE's website.

For any type of purchase made with A&I revenue, districts are responsible for providing oversight and for implementing accountability measures to ensure that expenditures align with allowable uses of funds.