

**Statement to be included in the record for the joint oversight roundtable on  
At-Risk Funding Transparency held Friday, February 1, 2019, by the Council of the  
District of Columbia Committee of the Whole and the Committee on Education  
February 15, 2019**

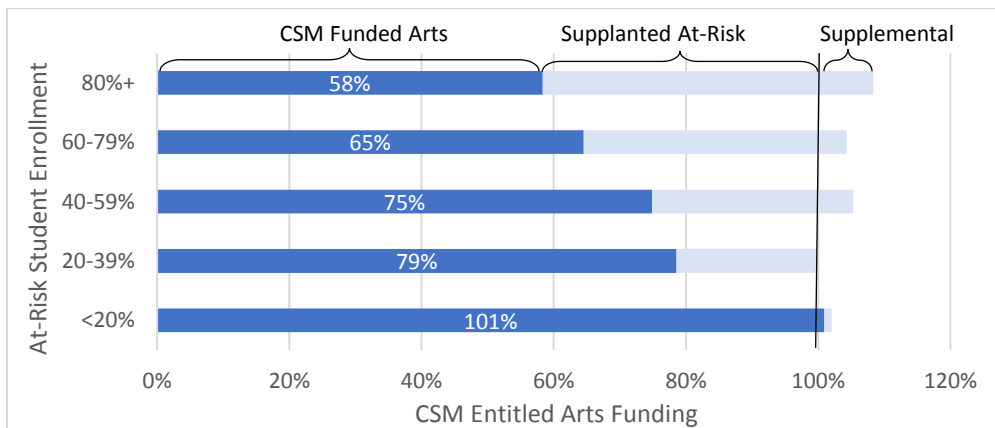
**Related Arts Teachers Distributed Inequitably Among  
DCPS Elementary Schools**

Through an ongoing follow-up study to our 2017 report, [Budgeting and Staffing at Eight DCPS Elementary Schools](#), the Office of the District of Columbia Auditor (ODCA) found substantial evidence the District of Columbia Public Schools (DCPS) failed to adhere to its policies when funding art, music, physical education/health (P.E.), and world language staff within DCPS elementary schools. Our findings show that adequate funding for these required positions, generally referred to as related arts teachers, differed substantially based on the concentration of at-risk students in each school.

As shown in Figure 1 below, at schools serving high concentrations of at-risk students (80%-100%) only 58% of related arts teaching positions were funded with Comprehensive Staffing Model (CSM) entitled funds, i.e., funds allocating staff based on enrollment thresholds. At the same time, 101% (more than required) of related arts staffing was funded with CSM entitled funds in schools serving low concentrations of at-risk students (0%-19%).

ODCA’s complete analysis is forthcoming, but our preliminary objective here is to analyze the use of CSM entitled funds and at-risk funds in Fiscal Year 2018 (school-year 2017-18) for related arts teachers in standalone DCPS elementary schools.

**Figure 1: FY18 DCPS Elementary School Funding for Related Arts Staff as a Percentage of CSM Entitled Funds by At-Risk Concentration**



*Source: FY 2018 DCPS school-level submitted budgets*

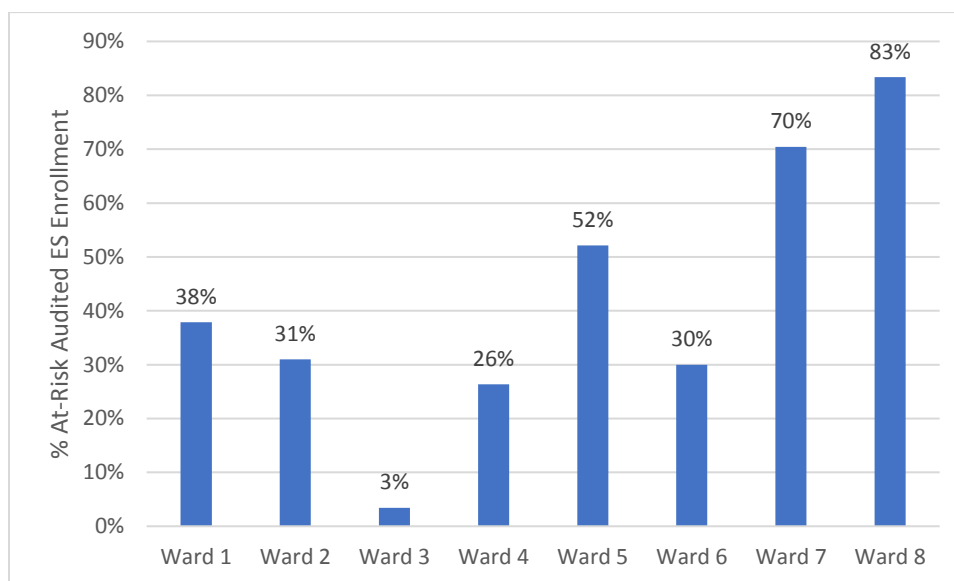
## Background

The District of Columbia funds its public schools through the Uniform Per Student Funding Formula or UPSFF.<sup>1</sup> The UPSFF sets a foundation level of funding (\$9,972 per student in Fiscal Year 2018<sup>2</sup>) needed to provide adequate regular education services to students.<sup>3</sup> The “Fair Student Funding and School-Based Budgeting Amendment Act of 2013” added an at-risk weight to provide additional funding to schools for any students who are:

- Homeless.
- In the District’s foster care system.
- Qualified for the federal Temporary Assistance for Needy Families program or Supplemental Nutrition Assistance Program.
- High school students who are one year older, or more, than the expected age for the grade in which the student is enrolled.<sup>4</sup>

Approximately 44% of all DCPS elementary school students are considered at risk; however, this percentage is not evenly distributed across the District. For example, only 3% of Ward 3 DCPS elementary school students were at risk while 83% of Ward 8 DCPS elementary school students were considered at risk in school year 2017-18. Further, of all the at-risk elementary school students DCPS serves (10,654), 59% of these students are enrolled in schools in Wards 7 and 8, whereas only 10% are enrolled in schools in Wards 2, 3, and 4. Therefore, any use of at-risk funds that is contrary to policy is likely to impact some wards more than others.

**Figure 2: Audited At-Risk Enrollment in DCPS Elementary Schools by Ward, School Year 2017-18**



**Source: OSSE audited enrollment SY 2017-18**

The Fair Student Funding Act includes specific requirements for DCPS’s use of at-risk funds. The law requires that at least 90% of DCPS at-risk funding go toward school-level budgets and that the central office distributes funds proportionately based on each school’s at-risk enrollment projection.<sup>5</sup> DCPS must also use its at-risk funds “for the purpose of improving student achievement among at-risk students.”<sup>6</sup> Further, these funds must be supplemental to each school’s gross budget and not supplant any general funds, that is, any UPSFF, federal, or other funds to which the school is entitled.<sup>7</sup>

Similarly, the federal government requires that Title I funds “supplement not supplant,” or be in addition to, not in place of, any state or local funds allocated for specific purpose. More specifically, corresponding guidance states that funds be allocated “without regard for Title I status,”<sup>8</sup> meaning that that Title I status should be indiscernible prior to the distribution of these funds. Therefore, if school budgets show differences in allocations before Title I funds are added—and those differences are related to schools’ Title I status – they fail the test of Title I neutrality.

DCPS funds its schools using the Comprehensive Staffing Model (CSM). The CSM requires that each school receive funding for staffing based on projected enrollment. Therefore, these staff positions are both entitled and required by the CSM. In fact, principals may petition the central office to reallocate funds away from required positions but, as evidenced by our 2017 report, a request to defund a part-time related arts teacher was denied on the grounds that the position is required for elementary schools.<sup>9</sup>

The FY18 School Budget Development Guide that provides additional detail regarding the CSM, states that students will have 45 minutes of special instruction each day. This special instruction should include art, health, music, physical education and world language, each at least once a week at minimum.<sup>10</sup>

**Figure 3: Entitled Related Arts Teachers in DCPS Elementary Schools**

Projected School Enrollment	Total Art, Music, P.E., and World Language Teachers
Fewer than 400 students “small”	3.0
Between 400 and 599 students “medium”	4.5
600 or more students “large”	5.5

*Source: DCPS FY 2018 Comprehensive Staffing Model<sup>11</sup>*

### Analysis

As noted above, this analysis represents a section from what will be a larger report. What are referred to as related arts teachers in elementary schools represent only a small part of overall school-level budgets. Three pieces of evidence warrant this focus: First, spending on related arts teachers was the second highest category out of 26 different uses of at-risk funds reported by DCPS schools in the 2017-18 school year, behind spending on extended day or year (see Appendix B for a full list). Second, related arts teachers are allocated to elementary schools based on a clear formula, shown in Figure 3 above, which allowed for uncomplicated analysis. Finally, the majority of DCPS schools are elementary schools and the majority of students are in the elementary grades.

The focus of this report is related arts funding at the elementary level, and it is not a complete picture of use of at-risk funds. Other reports have shown evidence of misuse of at-risk funds across multiple areas including, for example, to fund required special education positions or athletic coordinators.<sup>12</sup> Our larger report will provide a broader picture of use of these funds.

To complete this analysis, we compared each school’s submitted budget with a report of at-risk funded items by school.<sup>13</sup> Any usage of at-risk funds to meet required related arts staffing levels was defined as a misuse of at-risk funds. For example, if a small school’s submitted budget used at-risk funds to pay for 2.0 of its 3.0 required related arts staff, we recorded this as the school receiving 1/3 (33%) of its CSM entitled related arts staff. Our report does not include any analysis of positions funded by parent or private fundraising. We investigated funding by at-risk concentration and ward to examine differences and patterns.

Last, we calculated the percentage of CSM entitled related arts positions funded using CSM entitled funds and at-risk funds across all DCPS elementary schools and compared schools by concentration of at-risk students.

## Results

Overall, 42 out of 64 stand-alone elementary schools, with an average at-risk enrollment of 56%, were required to use at-risk funds to meet CSM staffing requirements, while 22 other schools with an average at-risk enrollment of 42% were fully funded or over-funded for the same requirements.

As shown in Figure 4, schools with the lowest concentration of at-risk students (0-20% at-risk) had 61.1 of 60.5 (101%) of entitled related arts positions funded, whereas schools with the highest concentration of at-risk students (80-100%) had 28 of 48 (58%) positions funded. Overall, 179 of 234 (77%) of CSM entitled related arts positions were funded without the use of at-risk funds.

**Figure 4: FY18 DCPS Elementary School Funding for Related Arts Staff as a Percentage of CSM Entitled Funds by At-Risk Concentration**

At-Risk Concentration	CSM Entitled Related Arts Staff	CSM Funded Related Arts Staff	At-Risk Funded Related Arts Staff	CSM Funded Percentage	At-Risk Funded Percentage
80%+ at-risk <i>count = 14</i>	48.0	28.0	24.0	58%	50%
60-79% at-risk <i>count = 14</i>	46.5	30.0	18.5	65%	40%
40-59% at-risk <i>count = 15</i>	56.5	42.3	17.2	75%	30%
20-39% at-risk <i>count = 6</i>	22.5	17.7	4.8	79%	21%
<20% at-risk <i>count = 15</i>	60.5	61.1	0.7	101%	1%
<b>Total</b> <i>count = 64</i>	<b>234.0</b>	<b>179.0</b>	<b>65.2</b>	<b>77%</b>	<b>28%</b>

**Source: FY 2018 DCPS school-level submitted budgets**

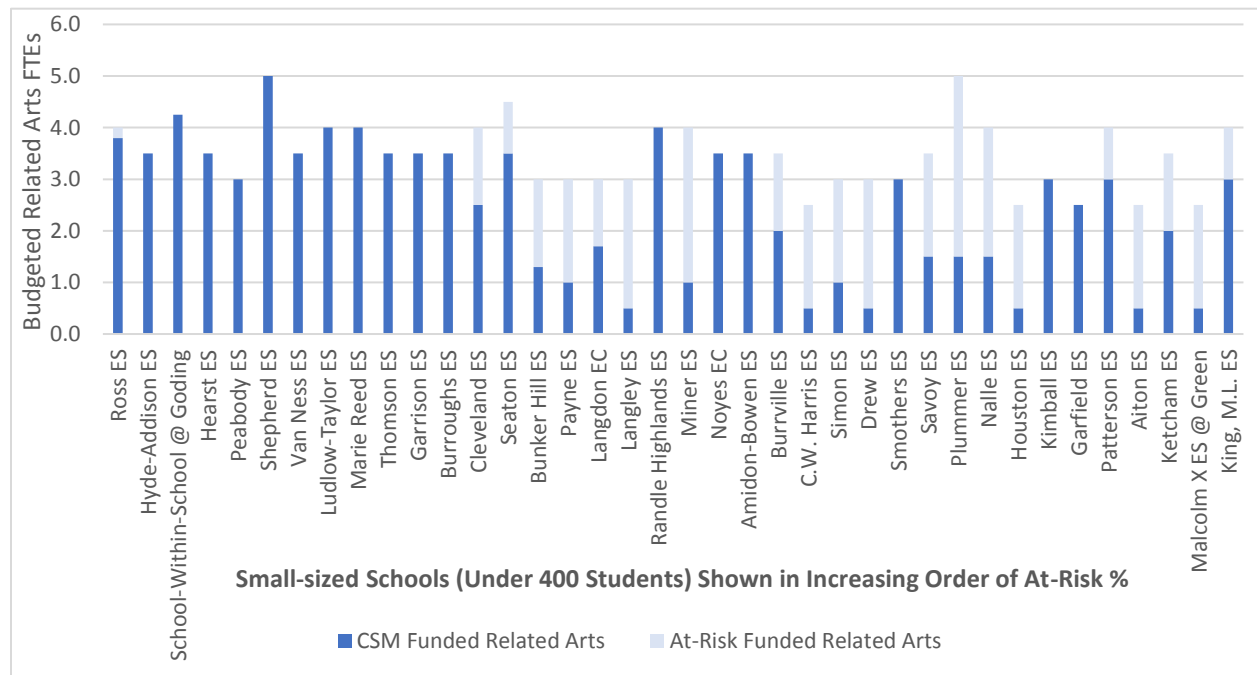
For example, Savoy Elementary School and Hyde-Addison Elementary School are very similar schools in terms of overall enrollment. Savoy was projected to have 334 students and Hyde-Addison was projected to have 335 students in school year 2017-18. However, the characteristics of the two student populations are quite different. Eighty-two percent of Savoy’s students are considered at risk, 15% represent students with disabilities, and 99% are African American. Savoy Elementary is in Ward 8. In contrast, 12% of Hyde Addison’s students are considered at risk, 8% are students with disabilities, and 44% are African American. Hyde-Addison is in Ward 2 but was temporarily located in Ward 1 for the 2017-18 school year. Savoy was budgeted for 1.5 related arts positions whereas Hyde-Addison was correctly given funding for all 3 related arts teachers. DCPS, therefore, provided a budget to Savoy that used at-risk funds to pay for the unfunded, but nonetheless required, related arts teacher positions.

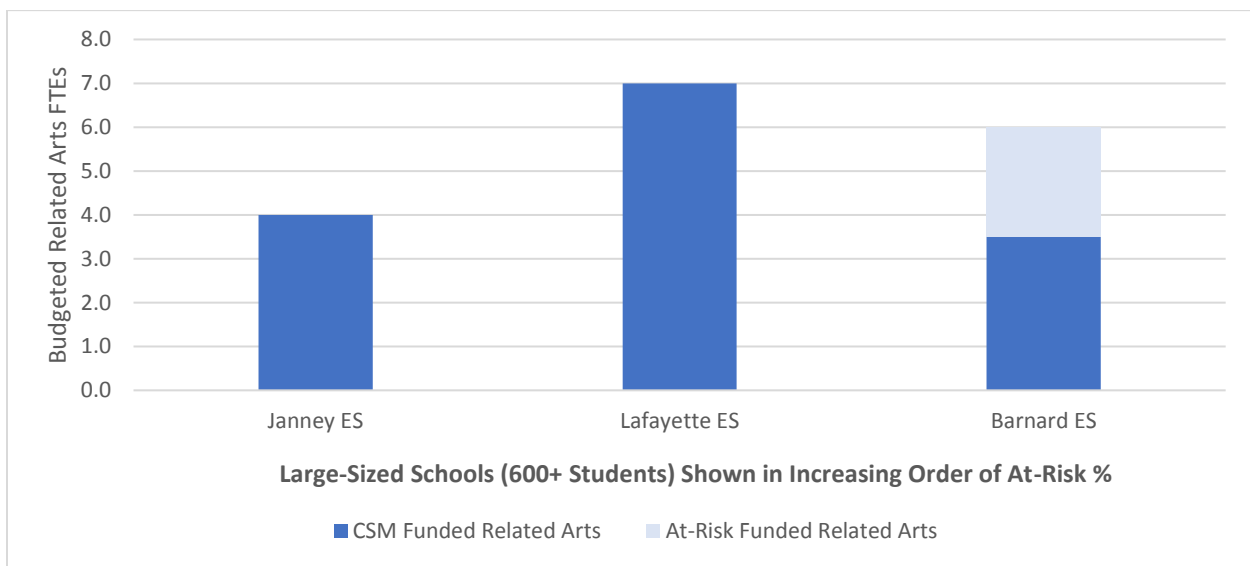
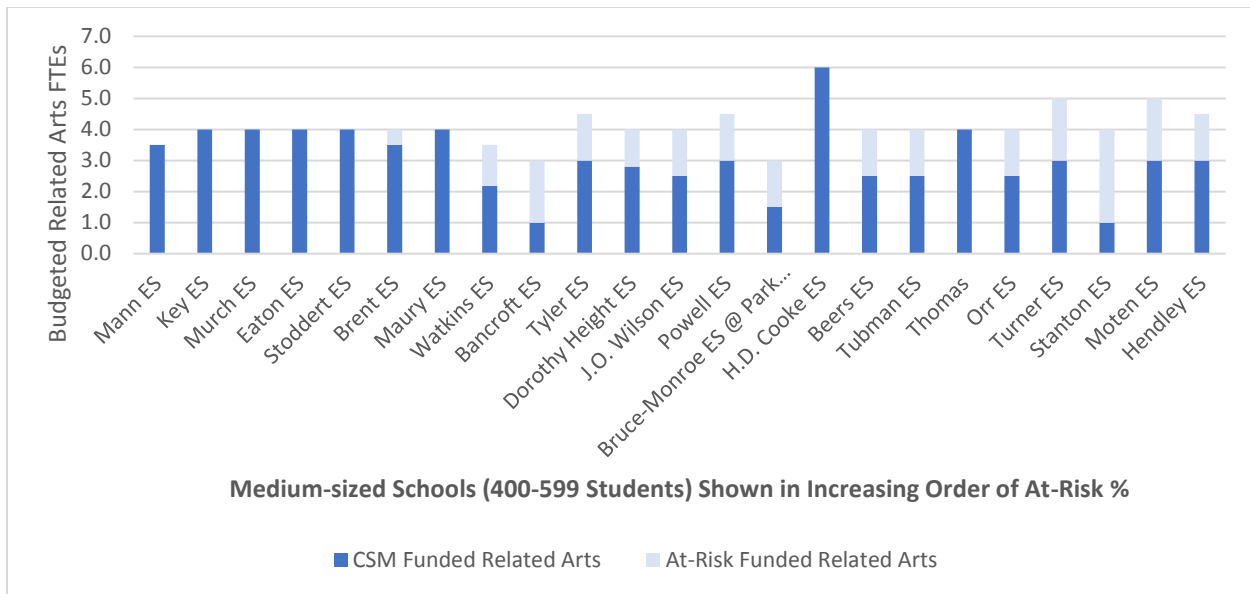
There are many more of these examples. The School-Within-School at Goding (SWS), in Ward 6, had a total budgeted enrollment of 298 students, 23 of whom were projected to be at risk, or 8%. Houston Elementary School, in Ward 7, had a total budgeted enrollment of 294 students, 236 of whom were

projected to be at risk, or 80%. Both schools were required to have 3 related arts teachers according to the Comprehensive Staffing Model. SWS received funding for 4.25 related arts staff and Houston received funding for only half of one position. Houston was forced to spend at-risk funds to make up the difference in required staff. In this case, a school with 236 at-risk students received substantially less base funding than a school with only 23 at-risk students.

The overarching trend shows that CSM entitled funds allocated to required related arts staffing decreases as the concentration of at-risk students increases with notable variation at the school level. It does not appear to be the case that DCPS used a specific formula to determine how CSM entitled funds were allocated. Instead, schools with similar total enrollment and total number of at-risk students received different CSM entitled fund allocations to meet the same requirement.

**Figure 5: Budgeted Related Arts Full Time Equivalents (FTEs) in Small, Medium and Large DCPS Elementary Schools, School Year 2017-18**

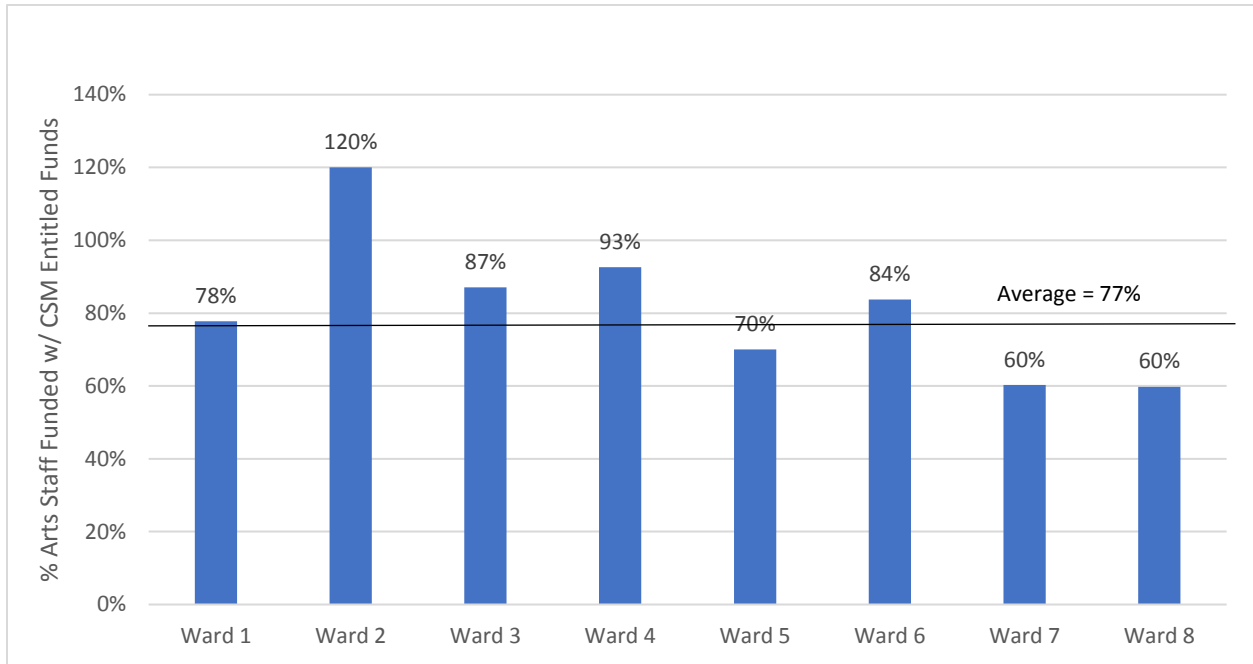




**Source: FY 2018 DCPS school-level submitted budgets**

Finally, Wards 5, 7, and 8, those serving the highest percentage of students considered at-risk, received the lowest levels of CSM entitled related arts funding as shown in Figure 6. Further, Ward 2 elementary schools, on average serving 31% of students considered to be at risk, received more CSM entitled related arts funding than was required, from 117% of required funding at Thomson and Garrison Elementary Schools to 127% of required funding at Ross Elementary School.

**Figure 6: Percentage of Entitled Related Arts Staff Funded with CSM Funds by Ward, School Year 2017-18**



**Source: FY 2018 DCPS school-level submitted budgets**

## Conclusions

DCPS has struggled to meet the “supplement not supplant” requirements of at-risk funding.<sup>14</sup> What has not been adequately addressed is why funds for required staffing look so different across the range of elementary schools. The disparities identified raise questions about how and when and by whom final decisions about use of at-risk funds have been made. What additional investments could have been made if funds had been allocated equally or even equitably?

DCPS officials and others<sup>15</sup> have suggested that the misuse of at-risk funds is due to overall budget shortfalls. Our analysis, while limited to just related arts staff in standalone DCPS elementary schools, indicates that if there is a shortfall, its burden is not equally shared. DCPS funded only 179 related arts teachers using CSM funds in its Fiscal Year 2018 submitted budgets—55 short of the 234 related arts teachers prescribed in the elementary CSM. Collectively, DCPS would have needed to allocate an additional \$5.4 million<sup>16</sup> to meet these requirements.

Further, if federal “supplement not supplant” guidance was applied to at-risk funds this would require the \$5.4 million shortfall to be equally distributed across all schools. Spreading the shortfall equally would mean that all schools receive approximately 77% of their required related arts staffing. At-risk funds could then be used above and beyond CSM entitled related arts fund allocations and a District-wide conversation about resource allocations would likely ensue.



**Appendix A: Audited At-Risk Enrollments and Percentages by Ward for  
DCPS Elementary Schools, SY 2017-18**

<b>Ward</b>	<b>At-Risk Audited Enrollment</b>	<b>Audited Enrollment</b>	<b>At-Risk % by Ward</b>	<b>% of All At-Risk DCPS ES Students</b>
Ward 1	1,143	3,020	38%	11%
Ward 2	227	732	31%	2%
Ward 3	115	3,353	3%	1%
Ward 4	751	2,849	26%	7%
Ward 5	665	1,276	52%	6%
Ward 6	1,452	4,840	30%	14%
Ward 7	2,743	3,894	70%	26%
Ward 8	3,558	4,268	83%	33%
<b>Total</b>	<b>10,654</b>	<b>24,232</b>	<b>44%</b>	<b>100%</b>

**Appendix B: Full List of DCPS At-Risk Funded Items by Dollar Amount, Fiscal Year 2018**

<b>FY18 At-Risk Funded Items</b>	<b>Sum of Amount</b>
Extended Day/Year	\$ 8,270,293
Related Arts Teacher	\$ 7,798,624
Reading Specialist or Teacher	\$ 3,948,363
High School Teachers Investment	\$ 3,657,936
Psychologist	\$ 3,449,777
Technology	\$ 2,890,410
Social Worker	\$ 2,412,823
Afterschool	\$ 2,187,886
Inclusion/Resource Teachers	\$ 2,075,808
Middle Grades Teacher Investment	\$ 1,978,121
Assistant Principal for Intervention	\$ 1,312,343
NAF (National Academy Foundation) Director	\$ 1,206,243
Pathways Coordinator	\$ 1,003,650
Middle Grades Social-Emotional	\$ 987,560
City Year/ Partnerships	\$ 839,500
Educational Supplies	\$ 836,249
Evening Credit Recovery (ECR)	\$ 687,820
Specialty Funds	\$ 663,173
Athletic & Activities Coordinators	\$ 602,190
NAF (National Academy Foundation) Coordinator	\$ 602,190
Relay Teacher Resident	\$ 318,065
Middle Grades Exposure & Excursion	\$ 276,000
High School Extended Hours for Computer Lab	\$ 161,064
Technology Instructional Coach	\$ 122,106
Manager Coordinator	\$ 106,037
Middle Grades Clubs & Activities	\$ 85,000
<b>Total</b>	<b>\$ 48,479,230</b>

*Source: FY 2018 DCPS Submitted Budget*

**Appendix C: FY18 DCPS Elementary School Related Arts Staff by Descending Concentration At-Risk**

		<b>% Projected At-Risk</b>	<b>CSM Entitled Related Arts Staff</b>	<b>Total Related Arts Staff</b>	<b>CSM Funded Related Arts Staff</b>	<b>At-Risk Funded Related Arts Staff</b>	<b>CSM Funded %</b>	<b>At-Risk Funded %</b>
Hendley ES	Ward 8	91%	4.5	4.5	3	1.5	67%	33%
King, M.L. ES	Ward 8	89%	3	4	3	1	100%	33%
Moten ES	Ward 8	88%	4.5	5	3	2	67%	44%
Stanton ES	Ward 8	88%	4.5	4	1	3	22%	67%
Malcolm X ES @ Green	Ward 8	88%	3	2.5	0.5	2	17%	67%
Ketcham ES	Ward 8	88%	3	3.5	2	1.5	67%	50%
Aiton ES	Ward 7	87%	3	2.5	0.5	2	17%	67%
Turner ES	Ward 8	86%	4.5	5	3	2	67%	44%
Patterson ES	Ward 8	85%	3	4	3	1	100%	33%
Garfield ES	Ward 8	85%	3	2.5	2.5	0	83%	0%
Kimball ES	Ward 7	81%	3	3	3	0	100%	0%
Houston ES	Ward 7	80%	3	2.5	0.5	2	17%	67%
Nalle ES	Ward 7	80%	3	4	1.5	2.5	50%	83%
Plummer ES	Ward 7	80%	3	5	1.5	3.5	50%	117%
Savoy ES	Ward 8	79%	3	3.5	1.5	2	50%	67%
Orr ES	Ward 8	79%	4.5	4	2.5	1.5	56%	33%
Smothers ES	Ward 7	78%	3	3	3	0	100%	0%
Drew ES	Ward 7	77%	3	3	0.5	2.5	17%	83%
Simon ES	Ward 8	76%	3	3	1	2	33%	67%
C.W. Harris ES	Ward 7	74%	3	2.5	0.5	2	17%	67%

		% Projected At-Risk	CSM Entitled Related Arts Staff	Total Related Arts Staff	CSM Funded Related Arts Staff	At-Risk Funded Related Arts Staff	CSM Funded %	At-Risk Funded %
Thomas	Ward 7	73%	4.5	4	4	0	89%	0%
Burrville ES	Ward 7	73%	3	3.5	2	1.5	67%	50%
Amidon-Bowen ES	Ward 6	72%	3	3.5	3.5	0	117%	0%
Noyes EC	Ward 5	71%	3	3.5	3.5	0	117%	0%
Miner ES	Ward 6	71%	3	4	1	3	33%	100%
Tubman ES	Ward 1	63%	4.5	4	2.5	1.5	56%	33%
Randle Highlands ES	Ward 7	62%	3	4	4	0	133%	0%
Langley ES	Ward 5	61%	3	3	0.5	2.5	17%	83%
Langdon EC	Ward 5	58%	3	3	1.7	1.3	57%	43%
Payne ES	Ward 6	58%	3	3	1	2	33%	67%
Beers ES	Ward 7	58%	4.5	4	2.5	1.5	56%	33%
H.D. Cooke ES	Ward 1	56%	4.5	6	6	0	133%	0%
Bruce-Monroe ES @ Park View	Ward 1	53%	4.5	3	1.5	1.5	33%	33%
Bunker Hill ES	Ward 5	51%	3	3	1.3	1.7	43%	57%
Barnard ES	Ward 4	51%	5.5	6	3.5	2.5	64%	45%
Seaton ES	Ward 6	51%	3	4.5	3.5	1	117%	33%
Cleveland ES	Ward 1	50%	3	4	2.5	1.5	83%	50%
Powell ES	Ward 4	50%	4.5	4.5	3	1.5	67%	33%
Burroughs ES	Ward 5	50%	3	3.5	3.5	0	117%	0%
J.O. Wilson ES	Ward 6	49%	4.5	4	2.5	1.5	56%	33%
Garrison ES	Ward 2	47%	3	3.5	3.5	0	117%	0%

		% Projected At-Risk	CSM Entitled Related Arts Staff	Total Related Arts Staff	CSM Funded Related Arts Staff	At-Risk Funded Related Arts Staff	CSM Funded %	At-Risk Funded %
Dorothy Height ES	Ward 4	46%	4.5	4	2.805451	1.194549	62%	27%
Thomson ES	Ward 2	43%	3	3.5	3.5	0	117%	0%
Tyler ES	Ward 6	39%	4.5	4.5	3	1.5	67%	33%
Bancroft ES	Ward 1	38%	4.5	3	1	2	22%	44%
Marie Reed ES	Ward 1	36%	3	4	4	0	133%	0%
Ludlow-Taylor ES	Ward 6	29%	3	4	4	0	133%	0%
Watkins ES	Ward 6	28%	4.5	3.5	2.182689	1.317311	49%	29%
Van Ness ES	Ward 6	22%	3	3.5	3.5	0	117%	0%
Shepherd ES	Ward 4	17%	3	5	5	0	167%	0%
Maury ES	Ward 6	14%	4.5	4	4	0	89%	0%
Peabody ES	Ward 6	12%	3	3	3	0	100%	0%
Hearst ES	Ward 3	10%	3	3.5	3.5	0	117%	0%
Brent ES	Ward 6	9%	4.5	4	3.5	0.5	78%	11%
School-Within-School @ Goding	Ward 6	8%	3	4.25	4.25	0	142%	0%
Stoddert ES	Ward 3	8%	4.5	4	4	0	89%	0%
Eaton ES	Ward 3	6%	4.5	4	4	0	89%	0%
Hyde-Addison ES	Ward 1	6%	3	3.5	3.5	0	117%	0%
Murch ES	Ward 3	5%	4.5	4	4	0	89%	0%
Ross ES	Ward 2	4%	3	4	3.8	0.2	127%	7%
Key ES	Ward 3	3%	4.5	4	4	0	89%	0%

		% Projected At-Risk	CSM Entitled Related Arts Staff	Total Related Arts Staff	CSM Funded Related Arts Staff	At-Risk Funded Related Arts Staff	CSM Funded %	At-Risk Funded %
Lafayette ES	Ward 4	3%	5.5	7	7	0	127%	0%
Janney ES	Ward 3	2%	5.5	4	4	0	73%	0%
Mann ES	Ward 3	2%	4.5	3.5	3.5	0	78%	0%

\* Three DCPS elementary schools participated in the Fillmore Arts Center in SY2017-18, which receives partial funding through each participating school’s arts budget.<sup>17</sup>

<sup>1</sup> D.C. Law 12-207

<sup>2</sup> [https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/ga\\_dcps\\_chapter\\_2018j.pdf](https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/ga_dcps_chapter_2018j.pdf)

<sup>3</sup> D.C. Code § 38–2901(5)

<sup>4</sup> D.C. Code § 38–2901(2A)

<sup>5</sup> D.C. Code § 38–2907.01(a)(3)

<sup>6</sup> D.C. Code § 38–2907.01(b)(1)

<sup>7</sup> D.C. Code § 38–2907.01(b)(3)

<sup>8</sup> U.S.A. Department of Education, “SUPPLEMENT NOT SUPPLANT UNDER TITLE I, PART A OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965, AS AMENDED BY THE EVERY STUDENT SUCCEEDS ACT,” January 2019, page 7: <<https://www2.ed.gov/policy/elsec/leg/essa/snstitleguidance.pdf>>.

<sup>9</sup> Office of the District of Columbia Auditor, “Budgeting and Staffing at Eight DCPS Elementary Schools,” October 30, 2017, page 33: <[http://zd4l62ki6k620lqb52h9ldm1.wpengine.netdna-cdn.com/wp-content/uploads/2018/07/DCPS.Staffing.Report.Final\\_10.30.17.pdf](http://zd4l62ki6k620lqb52h9ldm1.wpengine.netdna-cdn.com/wp-content/uploads/2018/07/DCPS.Staffing.Report.Final_10.30.17.pdf)>.

<sup>10</sup> District of Columbia Public Schools, “School Budget Development Guide Fiscal Year 2018 (FY18),” Updated February 2017, page 61:

<<https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/FY18%20Budget%20Guide.pdf>>.

Although beyond the scope of this report, it is also worth noting that the requirement that students “students will have 45 minutes of specials each day including art, health, music, physical education and world language to occur once a week at a minimum,” does not appear to align with CSM allocations for small schools. Small schools are allotted only three related arts teachers yet must provide four “specials” each occurring at least once a week for 45 minutes. It is similarly unclear if 4.5 and 5.5 related arts positions are sufficient to provide this same requirement in medium and large schools to all students; however, at least all four special subjects can be covered with at least one teacher, unlike in small schools.

<sup>11</sup> DCPS, “Comprehensive Staffing Model Elementary School FY 2018,” available at:

<https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/FY18%20DCPS%20Comprehensive%20Staffing%20Model%20-%20ES%202018.pdf>

<sup>12</sup> Wallace, Marlana. “What’s In the Fiscal Year 2018 Budget for PreK-12 Education?” July 27, 2017.

<sup>13</sup> Submitted budgets align with the Mayor’s submitted budget. Each school’s budget is available on the DCPS Data Center website here: <[http://www.dcpsdatacenter.com/fy18\\_submitted.html](http://www.dcpsdatacenter.com/fy18_submitted.html)>

<sup>14</sup> Stein, Perry. “DC is Misspending Millions of Dollars Intended to Help the City’s Poorest Students.” April 14, 2018. Available at: [https://www.washingtonpost.com/local/education/dc-is-misspending-millions-of-dollars-intended-to-help-the-citys-poorest-students/2018/04/14/6006c02a-3788-11e8-9c0a-85d477d9a226\\_story.html?utm\\_term=.88184a184bfc](https://www.washingtonpost.com/local/education/dc-is-misspending-millions-of-dollars-intended-to-help-the-citys-poorest-students/2018/04/14/6006c02a-3788-11e8-9c0a-85d477d9a226_story.html?utm_term=.88184a184bfc)

<sup>15</sup> Ibid; Lazere, Ed. “Testimony of Ed Lazere, Executive Director At the Joint Public Oversight Roundtable on At-Risk Transparency,” February 1, 2019.

<sup>16</sup> Multiplying the number of related arts staff funded with at-risk funds (55) by the teacher salary figure in the CSM (\$97,685), yields a total of approximately \$5.4 million.

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<sup>17</sup> Pick, Brian. "Fillmore Arts Letter to Families," dated November 29, 2016.