

Supplement Not Supplant Guidance for Title I, Part A

Background

In general terms, Title I, Part A funds should be in addition to (supplement) and not replace (supplant) state and local funds. Under ESSA, LEAs must demonstrate that the methodology they use to allocate state and local funds to schools provides each Title I, Part A school with all of the state and local money it would receive if it did not participate in the Title I, Part A program. Although the term “methodology” is not defined in ESSA, a Senate committee report describing the revised SNS test clarifies that it refers to “the manner in which [LEAs] allocate state and local resources to schools.”

Note: ESSA ends NCLB’s “Three Presumptions of Supplanting” for Title I, Part A only. This means ESSA’s SNS test does not look at how LEAs and schools spend Title I funds, but instead looks at how LEAs distribute state and local funds to Title I schools.

- LEAs are *not* required to identify individual costs or services as supplemental
- LEAs may provide services through a particular instructional setting to demonstrate compliance

Methodology

An LEA is responsible for documenting that it had a methodology to distribute funding and staffing to schools without taking Title I, Part A funds into account. LEAs will not be submitting their methodology to OSPI for approval; however, they should have the methodology available for auditing purposes.

Exemption from Methodology

An LEA is *fully* exempt from the methodology requirement if the LEA has:

- Only one school
- Only Title I schools
- Only one building per grade span
 - Example: An LEA with one K-6 building, one K-8 building, one 7-8 building, and one 9-12 building is fully exempt.

An LEA is *partially* exempt from the methodology requirement if the LEA has a grade span that contains only:

- a single school
- Title I, Part A schools
- non-Title I, Part A schools



Example of Partial Exemption

Grade Span	Title I, Part A Status	Exemption Status
K-2	1 Title, 1 non-Title	Include in methodology
3-6	2 non-Title	Exempt – only non-Title schools
K-6	2 Title	Exempt – only Title schools
7-8	1 Title, 1 non-Title	Include in methodology
9-12	1 non-Title	Exempt – single school

An auditor may confirm that the LEA is exempt or partially exempt from this requirement by reviewing iGrant form package 201–Page 6A, B, C, or D.

Note: Adopting the “NCLB Three Presumptions of Supplanting” is not a sufficient methodology for resource distribution under ESSA.

For the methodology, OSPI is allowing that:

- LEAs are *not* required to use the same methodology for each school. The methodology could vary based on:
 - Grade-span
 - School size
 - Student need (ELL, special education, etc.)
 - School model (CTE, magnet, etc.)
 - Other factors (not based on Title I status)
- LEAs can use the allocation of staffing units, rather than funds, for allocation of all employee related costs. This means it can exclude compensation from their methodology and instead use staff units (FTE).
- The LEA methodology for distributing state and local resources *only* applies to charges allowed under Title I, Part A as listed in the OSPI [SAFS](#) accounting manual. Consistent with the accounting manual and the Uniform Grants Guidance, the Title I, Part A costs must be *necessary, reasonable and allocable*. As such, the methodology for distribution of state and local resources only applies to equivalent Title I, Part A charges. The methodology could address any of the following if allocated at the building level:
 - Teaching
 - Learning Resources
 - Guidance and Counseling
 - Supervision (administrative)
 - Health Related Services
 - Instructional Professional Development
 - Instructional Technology
 - Curriculum
 - Communications (such as translation for parent/family engagement)



Exclusions from the Methodology

- Any centrally administered resources: employee-related compensation, curriculum purchases, etc.
- LAP funds, as it is a supplemental state funding source that has the same intent and purpose as Title I, Part A
- Costs that are Title I, Part A allowable only in limited circumstances:
 - Maintenance and utilities
 - Student transportation
 - Costs that are never allowed under Title I, Part A, either through ESSA or the Uniform Grants Guidance
 - debt service, capital expenditures, building repair costs, bus depreciation, food service, and child nutrition
 - costs already obligated for specific building repairs through locally approved capital levies and bonds

Methodology Documentation

An LEA's documentation should explain how it:

- Distributes state and local staff units and funds to schools for each school year using a methodology that did not take into account a school's Title I, Part A status.
- Demonstrates that the methodology doesn't reduce funding for Title buildings.
- Demonstrates that they followed their published methodology.

Questions for LEAs to address in the documentation:

- What was the process used for distributing staff (FTE) for principals, teachers, and paraeducators, etc.?
- Is there an additional weight or consideration for student factors, such as English language learners, special education, and free and reduced price lunch eligibility?
- What is the process used to allocate funds for consumable materials to schools?
- Document exceptions: if the district centralizes certain programs, or locates certain programs at one building, document this.

Note: The methodology does not mean that each school will necessarily receive the same staff level or amounts per student. The methodology may have additional amounts based on the needs of the student population, i.e. a weighted methodology. The key for the SNS analysis is that the LEA can document and explain that Title I, Part A was not a factor in how state and local resources were distributed.

Keep in mind that the methodology cannot deprive a Title I school of state/local funds because of its Title I status.



Allowability

Also keep in mind that Title I costs must still be allowable under the Title I program. This means:

- Costs still must only benefit eligible students (eligible students = all students in a schoolwide program and identified students in a targeted assistance program).
- Costs must be permissible under Title I and ESSA generally (note that ESSA clarified the wide uses of funds that can be permissible under the Title I program).
 - Context matters. For example, a school operating a schoolwide program should be able to demonstrate that a Title I cost is consistent with the school's needs assessment and schoolwide plan.
- Costs must still be necessary and reasonable.

Methodology Examples

Example Methodology 1: Grade Span

The LEA distributes its state/local funds based on the grade level of the student:

- All elementary schools receive \$700 per student
- All middle schools receive \$625 per student
- All high schools receive \$650 per student

This distribution methodology works as it distributes the funds based on defined grade-spans, without regard to Title I funding. This methodology would suit an LEA with a predictable student population at each level.

Example Methodology 2: Student Characteristics

The LEA distributes its state funds based on the characteristics of students in each school so that students with characteristics associated with educational disadvantage generate additional funding for their school.

The LEA provides:

- \$400 for every student
- An additional \$200 for each economically disadvantaged student
- An additional \$500 for each student with a disability
- An additional \$300 for each English language learner

This distribution methodology works as it distributes the funds without regard to the Title I funding received by each school building, but instead based on set student characteristics. This methodology suits an LEA with a dynamic student population as it includes a focus on the make-up of the student population rather than solely the number of students.



Example Methodology 3: Staff Units (FTE)

The LEA distributes funding based on an FTE basis:

- 1 teacher per 22 students (\$75,000/teacher)
- 1 principal/school (\$120,000)
- 1 librarian/school (\$75,000)
- 2 guidance counselors/school (\$75,000/guidance counselor)

This methodology works because resources are distributed regardless of whether a school receives Title I, Part A funds. This example does not, however, suggest that non-Federal funds must be used to support the activities in the table above; rather, Title I funds may be used to support any activity identified by the comprehensive needs assessment and articulated in the schoolwide plan.

Example Methodology 4: Combined Approach

The LEA distributes resources based on the characteristics of the students as well as the staffing and supplies needs of the schools. The distribution of funds is based on a combined approach of the methodologies shown above:

- 1 teacher per 22 students (\$65,000/teacher)
- 1 principal/school (\$120,000)
- 1 librarian/school (\$65,000)
- 2 counselors/school (\$65,000/counselor)
- \$450 per student
- An additional \$200 for each economically disadvantaged student
- An additional \$500 for each student with a disability
- An additional \$350 for each English language learner
- \$425/student for instructional materials and supplies (including technology)

This methodology is neutral in regard to the Title I, Part A status of each school. It allows for a varying student count by including a focus on building-specific needs.

Q & A

- 1. Last year, we used state funds to pay for a math enrichment software program for our schoolwide program. This year, the school wants to use Title I, Part A funds to pay for the software program. Is this supplanting? Is it allowable?** This is not supplanting because the three presumptions no longer apply. It may be allowable based on the expenditure being reasonable, necessary, and allocable to carry out the program (be sure the program is part of the schoolwide plan).
- 2. One of our targeted assistance schools wants to purchase the math enrichment software that the schoolwide program has purchased. They want to use Title I, Part A funds to purchase the software to use with all of their students.** This is not



supplanting because the three presumptions no longer apply. However, the full cost is not allowable because not all students are eligible in a targeted assistance program.

- 3. Following up on the above questions, what if our targeted assistance school decides to purchase the math enrichment software by proportionally charging 20 percent to Title I (to match 20% of the students being served in Title I) and the remaining 80 percent to state funds?** As in the above responses, this is not supplanting because the three presumptions no longer apply. It may be allowable based on the expenditure being reasonable, necessary, and allocable to carry out the program, as well as part of the targeted assistance plan.
- 4. One of our schools was just cited for having three doors that no longer meet the fire code. Since it is a schoolwide program, can use Title I funds to replace the doors?** While this is not supplanting, it is not allowable as the doors are not related to the education of the students in the schoolwide program.

Additional Resources

- US Department of Education [Supplement Not Supplant Nonregulatory Guidance](#), June 2019
- [Title I, Part A Fiscal Handbook](#)

Questions may be sent to Title1a@k12.wa.us or 360-725-6100.

