

Understanding Title IA: Supplement, Not Supplant (SNS)

Office of Federal Programs · Revised July 2019

Ohio | Department of Education



Today's Discussion

What is the **purpose** of *Supplement, Not Supplant?*

Adding

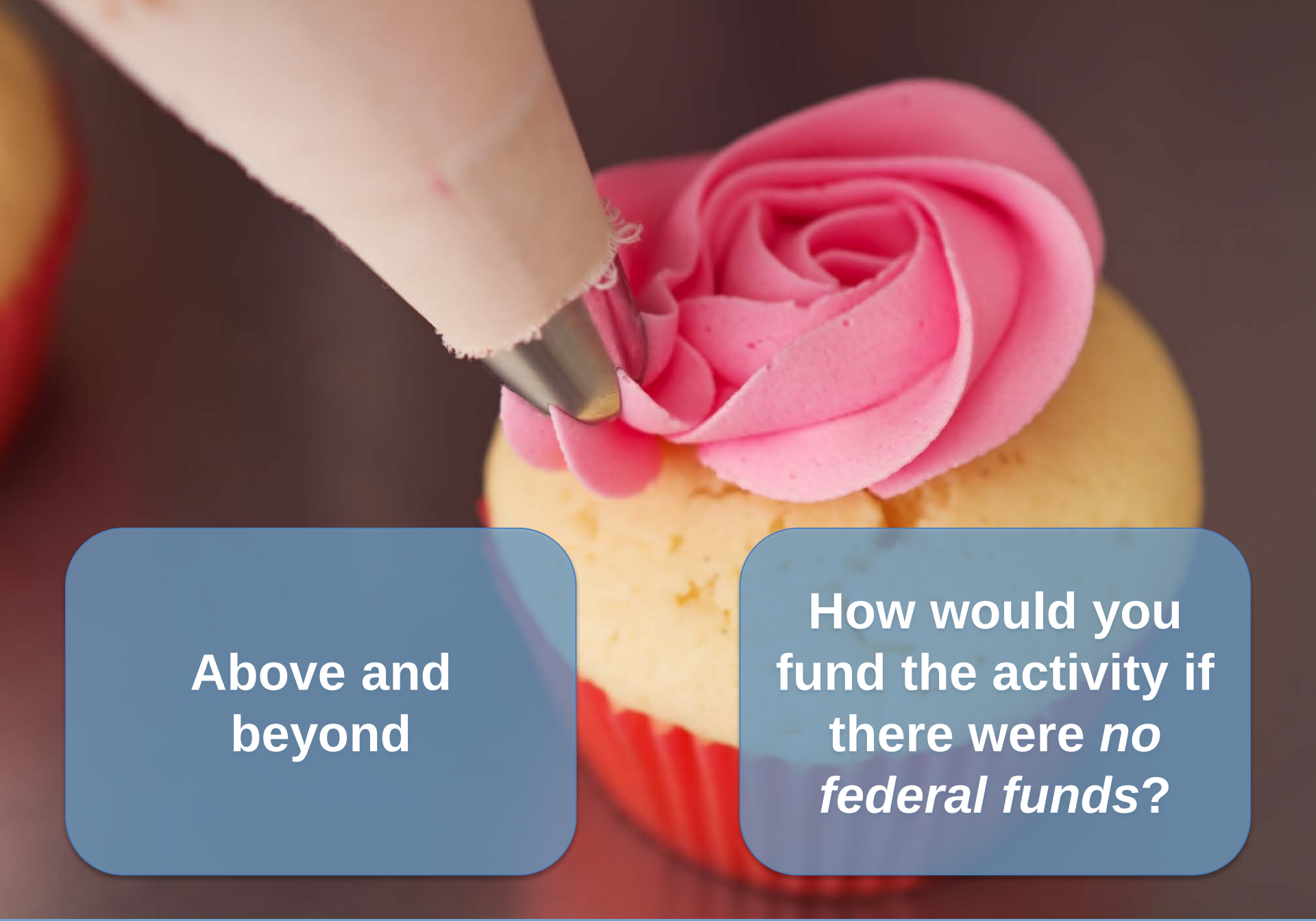
federal funds to state and local resources



Replacing

local resources with federal funds




Above and beyond
How would you fund the activity if there were *no federal funds*?

SNS compliance is ***different*** for **Title I, Part A.**



Compliance test for ESEA Titles II-IV

Uses previous presumptions of supplanting.

Nothing changed.

Compliance test for ESEA Title I, Part A

Neutrality test.

This is different.

Compliance test for Title funds II-IV still use these presumptions

Services that are ***required*** under other federal, state or local laws

Services that were ***provided*** with nonfederal funds in the prior year



ESEA and Title IA Funds

Supplement, Not Supplant


Supplement the
funds that would
be made available



Demonstrate compliance through an allocation methodology to buildings.

Ensures the building receives ALL funds it would otherwise receive – if it were not receiving Title I, Part A assistance.

Suggested Steps

1. Review guidance in winter/spring.
2. Consult stakeholders on resources to schools.
3. Determine districtwide initiatives.
4. Develop methodology to allocate state/local funds to buildings (before considering federal funds).
5. Post methodology on district website.
6. Select one of the two example methodologies in CCIP or describe another methodology.
7. Submit consolidated plan before July 1.
8. Regularly monitor and evaluate spending on methodology.
9. Maintain financial records of state/local funds supporting methodology.


1
Weighted Per Pupil Methodology
2
Resource Allocation Methodology



- Allocation/student = $7,000
- Additional allocation/student from a low income family = $250
- Additional allocation/English learner = $500
- Additional location/student with a disability = $1,500
- Additional allocation/preschool student = $8,500

Weighted Per Pupil Methodology

Category	Calculation	Amount
Allocation/student	450 x $7,000	$3,150,000
Allocation/student from low-income family	200 x $250	$50,000
Allocation/English learner	100 x $500	$50,000
Allocation/student with a disability	50 x $1,500	$75,000
Allocation/preschool student	20 x $8,500	$170,000
		$3,495,000

- 1 teacher per 22 students ($65,000/teacher)
- 1 principal/school ($120,000)
- 1 librarian/school ($65,000)
- 2 guidance counselors/school ($65,000/guidance counselor)
- $825/student for instructional materials and supplies (including technology)



Resource Allocation Methodology

Category	Calculation	Amount
1 principal	1 x $120,000	$120,000
1 librarian	1 x $65,000	$65,000
2 guidance counselors	2 x $65,000	$130,000
21 teachers	21 x $65,000	$1,365,000
Materials, supplies	450 x $825	$371,250
		$2,051,250

Example: Meeting Requirements

$90 per elementary school student

$65 per middle school student

$80 per high school student

Other Considerations

1. Using state and local funds for districtwide activities

2. Exceptions to methodology requirement

3. Exclusion of supplemental state and local funds

Using State and Local Funds for Districtwide Activities

- Districts typically do not allocate all of their state and local funds to schools
- However, all state and local funds must be used in a Title I neutral manner
- Districts may not consider the building's status when deciding to use state and local funds reserved at the district level
- Example: It is not Title I neutral if the district decides to use state and local funds to cover the cost of instructional coaches at non-Title I buildings and then requires the use of Title I funds for instructional coaches at Title I schools

Example:
NOT Meeting Requirements



A district implemented a STEM program in five schools using state/local funds.

Next year, they only have enough local funds to pay for two schools so they use Title I funds.

Exceptions to Allocation Methodology

- The Allocation Methodology Requirement is building specific
- There are certain districts that do not need to provide an allocation methodology:
  1. Districts with only one building
  2. Districts with only Title I school buildings
  3. Districts with a grade span that contains only a single school, non-Title I schools or Title I schools
- It is important to note these districts are still required to use Title I funds in a supplemental manner and on allowable activities



Districts that have a single school are excluded.

Districts with one school per grade span are excluded.

Exclusions: Supplemental State and Local Funds

- Districts are allowed to exclude from the allocation methodology “supplemental” state and local funds used for programs that meet the intent and purpose of Title I, Part A

- It must be both supplemental and for a Title I-like program

Special Issues to Consider

Most Title I resources should be expended at the building level.

New Title I SNS methodology requirement is at the building level.

District-level uses must be Title I neutral.

Special Rule





It is the local district's responsibility to determine the non-federal resources used to meet basic educational needs.

Resources

- Department Guidance

- US Department of Education June 2019 Final Guidance on Title IA SNS

- US Department of Education 2015 Guidance on Leveraging Federal Funds

Search:
Supplement, Not Supplant

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Regional Teachers of the Year Announced

11 teachers have been designated as the "2020 Teacher of the Year" for their respective State Board of Education district.

Read More...




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