

Title I, Part A Supplement, Not Supplant Frequently Asked Questions

The Every Student Succeeds Act (ESSA) passed in 2015 retained the supplement, not supplant (SNS) provision for Title I, Part A but changed the way in which a local educational agency (LEA) demonstrates compliance. The complete overview of SNS in Title I can be found [here](#).

1. **Where is the methodology provided to the Department?**

LEAs provide the SNS methodology as part of the Consolidated Funding Application (CFA) in the Title I, Part A section Supplement Not Supplant page and the Related Documents page by **May 1** each year.

2. **If a LEA has two schools, one serving grades K-5 and one serving grades 6-12, is it exempt?**

Yes, LEAs that only have one school or one school per grade band are exempt from submitting a methodology.

3. **What if the LEA is exempt?**

Only LEAs with **one school** or **one school per grade band** are exempt from providing a methodology. LEAs that meet one of the exemptions must complete the Supplement, Not Supplant page in the CFA to indicate why the LEA is exempt.

4. **If the LEA is only serving (with Title I funds) one grade span (i.e., K-4) does the methodology have to address middle and high school?**

Unless the LEA has only one school OR only one school per grade span, The LEA must have a methodology for all schools in the LEA, even if only one school is being served with Title I funds. Additionally, LEAs must have a methodology for all schools if there are multiple elementary schools and only one middle school and one high school.

5. **Does the methodology apply to items such as technology, supplies, and materials, or is it only staff funding?**

Yes. Methodologies must consider factors used to determine all funds that relate to student academic supports. Example items include technology, teacher supplies, staffing, professional development, additional necessary costs, and school resource officers.

6. **Should pre-K be included in the methodology?**

Typically, no, pre-K should not be included in the methodology unless there is a specific exception, as Title I serves ages 5-17 which is grades kindergarten through grade 12. One exception would be if there is a pre-K program in every school that is funded through state and local funds. In this instance, the pre-K funding could and should be part of the methodology.

7. **Are there any exclusions of state and local funds from the methodology?**

LEAs may **exclude supplemental state and local funds** (state/local funds above the funding methodology) used for any program that meets the intent and purpose of Title I, Part A (i.e., *Title I-like* funds). In other words, although an LEA may not reduce its allocation of state and local funds to a Title I, Part A school because the school receives Title I, Part A money, ESSA requirements allow for a degree of flexibility when it comes to *supplemental* state and local funds. Additional information on Title I-like funds will be released in an upcoming document.

8. What is the difference between the Title I SNS methodology and the Basic Education Program (BEP) formula? Is it by per pupil or enrollment?

The BEP is a funding formula provided to the LEA, and each LEA has the flexibility in determining the most appropriate use of state funds. There is flexibility within the formula on how BEP funds are used. The BEP may be utilized as a starting point for the methodology, but the methodology is the actual system by which resources are awarded to each school. The BEP formula is generated based on the LEA as a whole, whereas the SNS methodology is at the school level.

9. What happens if the per-pupil amount does not cover all of the schools' teacher salaries due to a school having a large number of advanced degrees (highly experienced teaching staff)?

LEAs are required to provide a basic education through the Basic Education Program (BEP) formula and local funds, including providing sufficient funds for teacher salaries across all schools to meet TCA class size mandates. The methodology should be calculated by using the LEA average for each position. Once the methodology provided is deemed to be allowable (i.e., Title I neutral), a Title I school may use Title I funds as needed to cover additional salaries. If the school is a non-Title I school, the additional funds must be from a different state or local funding source. Remember: The purpose is to demonstrate that the LEA is providing the basic education from state and local resources without additional funding. If this is not occurring, then the methodology may need to be revisited.

Item	Targeted Assistance After (ESSA)
SNS requirement	Title I, Part A funds must be supplemental to State and Local Funds.
SNS test	Supplanting occurs if: <ul style="list-style-type: none"> • A Title I, Part A school does not receive all of its state and local funds that it would otherwise receive if it was not receiving Title I, Part A funds.
How is compliance determined?	LEAs complete the SNS page in the CFA each year to indicate their SNS Methodology.
Allocability	Title I, Part A funds must be used to serve the purpose of Title I, Part A.
Who may be served?	Only students identified as at-risk may receive benefits from Title I, Part A funds.