

Title I Part A

Supplement, Not Supplant



September 2018



QUICK RECAP

The Law

Supplement Not Supplant (SNS) Law 1118(a)(b)(c)

- ❑ SNS is One of 3 fiscal tests in Title I, Part A
 - a. Comparability
 - b. SNS
 - c. Maintenance of Effort

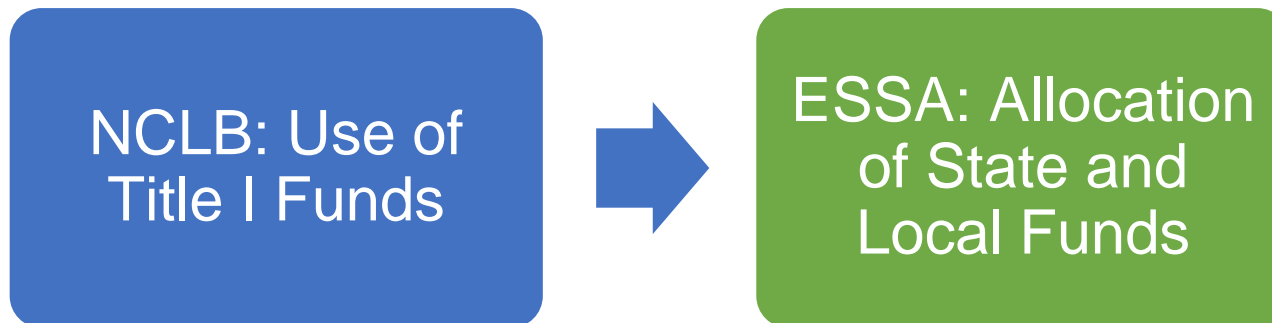
- ❑ Designed to ensure that Title I funds are not used to provide services that would, in the absence of those Title I dollars, be supported with state or local resources.

- ❑ Title I, Part A funds should **add** to (supplement) and not **replace** (supplant) state and local funds.

From NCLB to ESSA

In other words, the updated SNS test reviews the manner in which LEAs allocate State and local funds to schools to ensure Title I schools receive all of the funds they would have received had they not participated in Title I.

Shift from a Title I focus to a State and local focus.



Demonstrating Compliance

Demonstrate that the *methodology* used to allocate state and local funds to Title I schools ensures that Title I schools receive ALL of the State and local funds that they would receive even if they were not a Title I school.

Special Rule

NO LEA SHALL BE REQUIRED TO:

- Identify that an individual cost or service supported under this part is supplemental; or
- provide services under this part through a particular instructional method or in a particular instructional setting in order to demonstrate such agency's compliance with paragraph

Prohibition

Prohibition.--Nothing in this section shall be construed to authorize or permit the Secretary to prescribe the specific methodology a local educational agency uses to allocate State and local funds to each school receiving assistance under this part.

SNS Implementation Timeline

- ❑ Sec. 1118 (b)(5): A LEA shall meet the compliance requirement not later than 2 years after the date of enactment of the Every Student Succeeds Act:
- ❑ LEA must have a methodology in place in time for the LEA to use when ensuring that Title I funds are supplementing, and not supplanting other State and local funds in the [2018-2019](#) school year.
- ❑ May demonstrate compliance with the requirement under paragraph (1) before the end of such 2-year period using the **method such local educational agency used on the day before the date of enactment of the Every Student Succeeds Act.**

Methodology Examples

What is Methodology?



Methodology refers to the manner in which an LEA distributes state and local funds to schools.

Methodology Examines...

How the district **allocates** state and local funds to schools rather than how a school spends funds.

An LEA shall demonstrate that the *methodology* used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives *all of the State and local funds* it would otherwise receive it if were not receiving assistance under this part.
1118(b)(2)

Methodology Options



1. **Funding Formula** Weighted PPA
2. **Funding Formula** based on staffing & supplies
3. **Funding Formula** based on a combination approach (weighted PPA & staffing & supplies)
4. **Funding Formula** based on a locally developed methodology approved by the SEA

Methodology Option #1

Distribution of State and local funds based on characteristics of students (“weighted per pupil” funding formula)

Assumptions:

Allocation/student	\$7,000
Additional allocation/student from a low-income family	\$250
Additional allocation/English Learner	\$500
Additional allocation/student with a disability	\$1500
Additional allocation/preschool student	\$8,500

Assume:

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



Weighted per pupil

In a school of 450 students, including 200 students from low-income families, 100 English Learners, 50 students with disabilities, and 20 preschool students, the school would be expected to receive \$3,495,000 in non-Federal resources based on the following calculations:

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

To meet the supplemental funds test, an LEA would need to distribute non-Federal funds according to the assumptions above to all of its schools, regardless of whether a school receives Title I funds and operates a schoolwide program.

Methodology Option #2

Distribution of State and local funds based on staffing and supplies

Assumptions:

- Using the average district wide salary for each category of school personnel (district salary schedules)
- Using the average district wide per-pupil expenditure for non-personnel resources

Assume:

- ✓ 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)



**Staffing and
Supplies**

In a school of 450 students, the school would be expected to receive \$2,051,250 in non-Federal resources based on the following calculation:

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

To meet the supplemental funds test, an LEA would need to distribute non-Federal resources according to the assumptions above to all of its schools, regardless of whether a school receives Title I funds and operates a schoolwide program. 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 comprehensive schoolwide plan.

Methodology Option #3

A combination approach using methodology options number one and number two.

Methodology Option #4

or a locally developed methodology approved by
SEA.

The Evidence of Implementation

Evidence of Implementation

Required evidence of implementation for the **2018-2019**
Title I, Part A Program Review:

- LEA internal controls and written procedures regarding the written methodology used to allocate State and local funds to all schools
- Sample school allocation amounts
- District level time and effort documentation

Resources and References

- **ESSA of 2015 (page 77 – Section 1118 Fiscal Requirements)**
- USED July 2015 Guidance [Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program](#) under NCLB (p.8-12)
- [DCL from Office of State Support on December 6, 2017](#)
- Uniform Grants Guidance (UGG)
Overarching [fiscal administrative rules](#) that apply to federal funding
Comprehensive requirements for fiscal topics, such as a procurement, documentation, allowability 2 CFR 200 (Found at ecfr.gov)
- SNS resources from Colorado, Kentucky, Alaska and Brustein and Manasevit Presentation from July, 2018.

*Thank You for supporting Maryland students from
the MSDE Title I Team!*



SNS *“Regional” Table Talk*



1. **What methodology is your district using this school year?**
2. **Does your district plan on making any changes to your current methodology for the next school year?**
3. **What are your remaining questions regarding SNS in your region? Please provide to your MSDE Region POCs.**