POLICY TITLE: Title I-A Supplement Not Supplant

In accordance with federal law, the district may use Title I-A funds only to supplement the funds that would, in the absence of those Title I-A funds, be made available from state and local sources for the education of students participating in Title I-A programs, and not to supplant such funds. Under the Every Students Succeeds Act (ESSA), the district must demonstrate that the methodology used to allocate state and local funds to each school receiving Title I-A funds ensures that each school receives all of the state and local funds it would otherwise receive if it were not receiving Title I-A funds. The district is not required to identify individual costs or services as supplemental or provide services through a particular instructional method or in a particular instructional setting to demonstrate compliance.

Regardless of the type of Title I-A program (Schoolwide or Targeted Assistance), Title I-A funds must be used to serve the original purpose of Title I-A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close achievement gaps. Generally, charges to Title I-A programs must be necessary, reasonable, and allocable. However, if a Schoolwide school fully consolidates federal, state and local funds, there are no federal constraints on Title I-A funds included in the consolidated funding pool.

METHODOLOGY

The district uses the following methodology to ensure that federal funds are supplemental:

Methodology Based on Enrollment and Grades:

The basic allocation is based on total enrollment counts for each school, as if the state and local funds are the only monies that each school is receiving. Each school is given additional allocations for other needs (e.g. technology, supplies, etc.). Schools are grouped by grade span. Each span may have a different amount, but schools in each group are treated equally.

EXCLUSION OF "TITLE I-A LIKE" SUPPLEMENTAL STATE AND LOCAL FUNDS FROM THE METHODOLOGY

The district may exclude supplemental state and local funds used for any program that meets the intent and purpose of Title I-A. Thus, although the district may not reduce its allocation of general, state and local funds to a Title I-A school because the school receives Title I-A money, ESSA allows for a degree of flexibility when it comes to supplemental state and local funds. For purposes of supplement not supplant methodology, state and local funds are considered "supplemental" if they are used to pay for a "Title I-A like" activity or program. A program or activity is considered to be "Title I-A like" if it:

Either:

• Is implemented in a school with at least 40% poverty;

- Is designed to promote schoolwide reform and upgrade the entire educational operation of the school;
- Is designed to meet the educational needs of all students in the school, particularly those who are not meeting state standards; and
- Uses the state's assessment system to review the effectiveness of the program.

Or:

- Serves only students who are failing, or most at risk of failing, to meet state standards;
- Provides supplementary services to participating students designed to improve their achievement; and
- Uses the state's assessment system to review the effectiveness of the program.

METHODOLOGY EXCEPTIONS

The district is not required to demonstrate methodology if it has only one school building or if all schools are Title I-A served.



LEGAL REFERENCE:

20 U.S.C. §6321 – Fiscal Requirements, as amended by Every Student Succeeds Act of 2015 *Title I-A Guidance Manual: Supplement Not Supplant* – Idaho State Department of Education (01/15/19)

ADOPTED:

AMENDED:

*Language in text set forth in italics is optional.