

ESSA Quick Reference Brief: Methodology under Title I-A

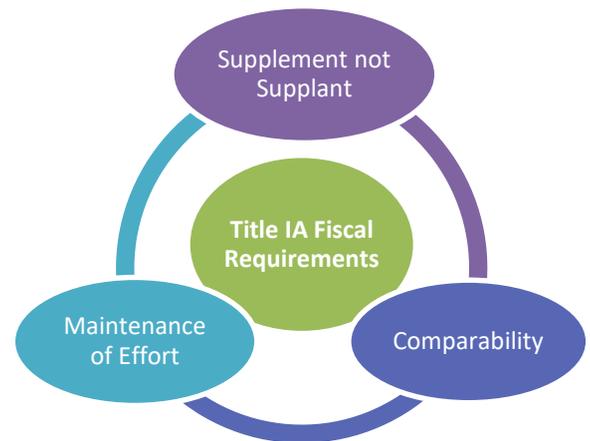
The purpose of Title I, Part A is to provide all children significant opportunity to receive a fair, equitable, and high-quality education and ensure that all children meet challenging academic standards. Title I-A provides financial assistance to districts and schools who serve a larger population of children from families experiencing poverty.

What the Law Says

The reauthorization of ESEA under the Every Student Succeeds Act (ESSA) changed the way supplement, not supplant (SNS) compliance is tested for districts and schools that receive Title I-A funds. ESSA’s revised SNS test does not look at how districts and schools spend Title I-A funds as a specific cost test, but instead looks at how districts distribute State and local funds to Title I-A schools.

Under ESSA, districts must demonstrate that the methodology used to allocate State and local funds to schools provides each Title I-A school with all of the money it would receive if it did not participate in the Title I program.¹

The term **methodology** refers to the manner in which districts distribute State and local funds to schools.



What It Means

To ensure that Title I-A funds have a meaningful impact on the students the program is designed to serve, Title I-A funds must add to (supplement), and not replace (supplant), funds available from State and local sources. In other words, a district’s methodology must be “Title I neutral” in that it allocates State and local funds to schools without regard for Title I-A status.

The district may vary its methodology because of factors such as grade-span (elementary, middle, high), school size, student needs (emergent bilingual, experiencing disability), provided these factors are not based on Title I-A status. The district must ensure its methodology distributes sufficient State and local funds to provide the basic education program in all its schools.

Requirements

Each district accepting Title I-A funds is required to articulate its methodology for allocating funds to schools on the Overview Page of the Title I-A Continuous Improvement Plan (CIP) Budget Narrative application. There are multiple ways a district might distribute State and local funds to its schools to satisfy the requirement that Title I-A funds be supplemental. The district is not required to implement a specific methodology to allocate State and local funds to its schools, as long as the methodology selected and implemented is neutral about the Title I status of the schools. **Single school districts, districts with only one school per grade span and districts that fund all schools with Title I-A funds are not required to complete the methodology description in the budget narrative application.**

¹ ESEA, Sec. 1118(b)(2)

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Methodology Examples

Several methodology examples are provided below. A district’s methodology does not necessarily need to fit within the parameters described in these examples and districts have broad flexibility in developing their methodology for the equitable distribution of funds.

Example 1: Distribution of State and local resources based on staffing and supplies

This form of equitable distribution is referred to as a “resource” based formula.

Mountain View School District Methodology

- 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)

In a school of 450 students, the school should receive \$2,051,250 in State and local resources using this method:

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
Instructional materials and supplies	450 x \$825	\$371,250
Total School Allocation		\$2,051,250

Example 2: Distribution of State and local resources based on characteristics of the students

This form of equitable distribution is referred to as a “weighted per pupil” funding formula.

Desert School District Methodology

- 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)

In a school of 450 students, including 200 students from families experiencing poverty, 100 emergent bilingual students, 50 students experiencing disabilities, and 20 preschool students, the school should receive \$3,495,000 in non-Federal resources using this method:

Category	Calculation	Amount
Allocation/student	450 x \$7,000	\$3,150,000
Allocation/student experiencing poverty	200 x \$250	\$50,000
Allocation/emergent bilingual student	100 x \$500	\$50,000
Allocation/student experiencing disability	50 x \$1,500	\$75,000
Allocation/preschool student	20 x \$8,500	\$170,000
Total School Allocation		\$3,495,000

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Questions for Reflection

1. What process does our district use to determine how State and local funds are distributed to schools?
2. What student needs should we consider when creating our methodology?
3. What internal controls does our district have in place to make sure our methodology is followed?

Frequently Asked Questions

1. **Does a district have flexibility when developing its methodology for allocating State and local funds to schools?** Yes, although many districts are likely to use an existing allocation methodology for purposes of demonstrating compliance (as long as its existing methodology is neutral with regard to a school's Title I status). In developing a methodology, districts may (but are not required to) consider:
 - a) Whether to use a single districtwide methodology or a variable methodology/multiple methodologies based on grade band or school type;
 - b) How the methodology may vary or scale based on student enrollment size; or
 - c) How the methodology may account for schools in need of additional funds to serve high concentrations of children with disabilities, English learners, or other such groups of students the district determines require additional support.
2. **Must an LEA maintain documentation to demonstrate that the LEA allocated State and local funds to schools in accordance with its methodology?** Yes. Under ESEA section 8306(a)(6)(B) and 34 C.F.R. §§ 76.730-76.731, a district must keep records to show compliance with program requirements and facilitate an effective audit. Accordingly, a district must maintain documentation necessary to demonstrate that its methodology results in each Title I school receiving all of the State and local funds it would otherwise receive if it were not receiving Title I, Part A funds and provide this information upon request to the SEA, auditors, and other authorized individuals. Examples of documentation include the district's methodology and calculations the district performed to implement its methodology.

Resources

- [Supplement not Supplant under Title I, Part A](#) (U.S. Department of Education)
- [Oregon Federal Funds Guide](#) (ODE)
- [ESSA Quick Reference Brief: Supplement not Supplant](#) (ODE)