

Supplement, Not Supplant At-A-Glance: Title I-A

What does it mean that federal funds must “supplement, not supplant” other funds?

Federal grant funds may be used only to supplement (add to) the educational programs generally offered with state and local funds and to provide supplemental services **that would not have been provided had the federal grant funds not been available.**

How does “supplement, not supplant” work under Title I-A?

To demonstrate compliance with the [Title I, Part A supplement not supplant provision](#) for school-level expenditures, districts must annually [provide the methodology](#) used to allocate state and local funds to each Title I-A funded school. This ensures that each Title I school receives all the state and local funds it would otherwise receive if it were not a Title I-A funded school. **In short, districts must distribute state and local funds to all schools as if no Title I funds were available to any schools in the district.**

Once the supplement, not supplant provision is met through the funding methodology and documentation demonstrates that each Title I school received its “fair share” based on the district’s funding methodology, items supported by Title I in a targeted or school-wide program are deemed to be supplemental. **Complying with supplement not supplant for Title I schools becomes a funding test, not an expenditure-by-expenditure test.** School-level expenditures are allowable, provided they are reasonable, allocable, necessary, and appropriately documented, once the district has provided a “Title I neutral” funding methodology for schools.

What are some examples when the use of Title I-A funds would not be supplemental?

- 1. An LEA does not have sufficient non-Federal funds to provide even the most basic education program in all its schools.** In this situation, if Title I funds are used to provide part of the basic level of education funding, they would not be supplemental, because an LEA is charged with providing a basic level of funding for all its students. If, however, the LEA can provide a basic education program in all its schools with nonfederal funds, the LEA may use Title I funds to operate a schoolwide program in an eligible school.
- 2. An LEA is required by State or local law to provide funding for a specific purpose for all students.** To the extent that an SEA or LEA provides funds to schools to meet a legal obligation, a Title I school must receive its fair share of those resources. For example, if State law provides funding for an LEA to deliver prekindergarten to all four-year-old students, a Title I school would need to receive sufficient State and/or local funds to meet that mandate.
- 3. An LEA uses Title I funds to pay for services that are otherwise required by federal law.** For example, services with the intent to meet the goals of an Individualized Education Program (IEP), such as specially designed instruction, cannot be provided by Title I-A funds (ESEA Section 1114(a)(2)(B)).

REMINDER: Even if an activity is not supplanting it must be [allowable](#), meaning that it is necessary, reasonable, and allocable to the program.

- [Title I-A Supplement Not Supplant Non-Regulatory Guidance](#)