

Supplement, Not Supplant At-A-Glance: Title II-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 II-A?

Supplanting is presumed if Title II-A funds are used for an activity the district:

1. Is legally required to carry out under state, local, or another federal law, or
2. Funded with state or local money in the previous year.

This includes any service districts are required to provide under state board rule or policy, state mandate, or local rule or policy, including those set by local school boards.

However, the second presumption may be overcome if a district demonstrates it cannot continue to support an activity with state or local funds because of a funding reduction in general funds. This requires written documentation (e.g., State or local legislative action, budget information, or other materials) that the district does not have the funds necessary to implement the activity and that the activity would not be carried out in the absence of the federal funds.

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

1. **State mandated professional development.** When the state imposes requirements on districts, Title II-A funds may only be used to enhance these efforts, not replace them. For example, [OAR 581-022-2440](#) requires that one teacher in each K-5 school receive training related to dyslexia. Because it would violate the first supplanting test, Title II-A funds could not be used to pay for training for these teachers. However, if the district wanted to provide dyslexia training to more than one teacher in each building, Title II-A funds could be used to pay for those **additional** teachers.
2. **If the LEA has previously used State or local funds to pay for the same professional development purpose.** For example, if a district has a newly adopted math curriculum and provided professional development on the adopted math curriculum in the past using state and local funds, Title II-A funds could not be used to provide professional development simply because a different curriculum was adopted. If, however, a district chose to provide PD on differentiation in math instruction, that would serve a different purpose and would not be considered supplanting.
3. **Funding an activity for some staff out of general funds and other staff out of Title II-A funds.** For example, in a district with 100 teachers, it would be supplanting to pay for 20 teachers to participate in an activity with Title II-A funds, and 80 teachers to participate in the same activity with general funds.

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

- [Title II-A Non-Regulatory Guidance](#)