Supplement, not Supplant At-A-Glance: Title IV-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 IV-A?

Supplanting is presumed if Title IV-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 IV-A funds would not be supplemental?

1. **Meeting basic education requirements.** LEAs are required to provide a basic level of education for all its students. While LEAs may use Title IV-A funds to provide supplemental materials and resources, materials such as core curriculum or equipment that are necessary to provide required instruction to students would not be allowable under Title IV-A.
2. **Building or classroom construction, remodeling, installation, and renovation.** Section 8526 of ESSA prohibits the use of funds for construction, renovation, or repair of any school facility. For example, the purchase of security equipment with Title IV-A funds could be an allowable expense, but costs for installation of that equipment would not be allowable.
3. **Funding an activity required by state law.** For example, in 2019 the Oregon Legislature passed SB 52 (Adi's Act) which requires LEAs to adopt a policy that includes a suicide prevention plan. While activities related to suicide prevention are allowable under the Safe and Healthy Students component of Title IV-A, it would be considered supplanting to use Title IV-A funds to develop or revise the plan. However, a district could use IV-A funds to provide professional learning on suicide prevention to staff.

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-VA Non-Regulatory Guidance