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**Title I-A Methodology Statement**

The purpose of this communication is to provide Oregon public school district representatives information regarding Title I, Part A (I-A), Supplement Not Supplant (SNS) language, and the methodology school districts use to allocate State and local funds to schools.

**Background:**

The U.S. Department of Education allocates Title I-A funds through State educational agencies (SEAs) to local educational agencies (LEAs) to improve the achievement of low-achieving students in schools with high concentrations of students from low-income families.

To ensure that the Federal investment has a meaningful impact on the students the program is designed to serve, Title I-A includes a requirement that Title I-A funds supplement, and do not supplant, funds available from State and local sources for the education of students participating in Title I-A programs.

The Every Student Succeeds Act of 2015 (ESSA) changes the way supplement, not supplant (SNS) compliance is tested for LEAs and schools that receive Title I-A funds. ESSA’s revised SNS test does not look at how LEAs and schools spend Title I-A funds as a specific cost test, but instead looks at how LEAs distribute State and local funds to Title I-A schools.

Therefore, an LEA must show that its methodology to allocate State and local funds to schools results in each Title I-A school receiving all of the State and local funds it would otherwise receive if it were not receiving Title I-A funds. In other words, an LEA’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 methodology statement applies only to Title I-A. Previous SNS rules still apply to other Title programs.

In designing a process for evaluating LEA compliance with ESSA’s revised Title I-A SNS test, it is important to consider that SNS is one of three fiscal tests in Title I-A: 1) maintenance of effort, 2) comparability, and 3) supplement not supplant. Each of these tests requires different things, in short:

* + *Maintenance of effort* requires LEAs to maintain a consistent floor of State and local funding for free public education from year-to-year.
	+ *Comparability* requires that state and local funds are used to provide services that, taken as a whole, are comparable between Title I-A and non-Title I-A schools.
	+ *Supplement not supplant* requires LEAs to distribute state and local funds to schools without taking into account a school’s participation in the Title I-A program.

While both comparability and SNS look at how LEAs distribute state and local funds and/or resources to schools, they are separate tests that measure different things.

**Articulating a district’s methodology:**

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.

The district must show that its methodology to allocate State and local funds to schools results in each Title I-A school receiving all of the State and local funds it would otherwise receive if it were not receiving Title I-A funds. In other words, a district’s ’s methodology must be “Title I neutral” in that it allocates State and local funds to schools without regard for Title I-A status.

Please see the [*Supplement not Supplant Methodology Guidance*](https://www2.ed.gov/policy/elsec/leg/essa/snsfinalguidance06192019.pdf) from the U.S Department of Education for specific methodology examples (pp.12-13).