

Title I, Part A Supplement not Supplant Frequently Asked Questions

The Every Student Succeeds Act (ESSA) passed in 2015 retained the supplement not supplant (SNS) provision for Title I, Part A but changed the way in which a district demonstrates compliance. The complete overview of SNS in Title I can be found [here](#). Below are questions regarding SNS that the department has received to date, and we will be updating this document in the coming months as we make the transition to the new requirement.

1. Where should districts upload the methodology?

The methodology should be on district letterhead and uploaded in ePlan no later than Oct. 1 in the district's Consolidated Funding Application: FY19/Title I related documents folder.

2. Who is an eligible designee?

The director of schools or chief financial officer may sign the methodology. Any other designee must have prior written approval from the Executive Director of CPM (Eve.Carney@tn.gov).

3. Is there a list of what must be included in the methodology?

Methodologies must include:

- Name of schools
- Student enrollment
- Grade levels served
- Student demographic data
- Factors being used to determine the funding allocations, including if there are differences by grade bands
- Assurance (see methodology examples)
- Signature of director of schools or designee
- Date signed

The department cannot prescribe a particular methodology, as that is a district-level decision. The methodology must detail how state and local funds are being allocated in a "Title I neutral" manner for items included in providing academic supports for students. The methodology does not need to include operational costs. Additional information can be found in the example methodologies [here](#).

4. Should the methodology include items such as technology, supplies, and materials?

Yes. Methodologies must include the factors used to determine all funds that relate to student academic supports. Example items include technology, teacher supplies, staffing, professional development, additional necessary costs, and school resource officers.

5. What happens if the per pupil amount does not cover all of the school's teacher salaries due to a school having a large number of advanced degrees (highly experienced teaching staff)?

Districts are required to provide a basic education through the Basic Education Program (BEP) formula and local funds, including providing sufficient funds for teacher salaries across all schools to meet state's class size mandates. The methodology should be calculated by using the district average for



each position. Once the methodology provided is deemed to be allowable (i.e., Title I neutral), a Title I school may use Title I funds as needed to cover additional salaries. If the school is a non-Title I school, the additional funds must be from a different state or local funding source. Remember: The purpose is to demonstrate that the district is providing the basic education from state and local resources without additional funding. If this is not occurring, then the methodology may need to be revisited.

6. What is the difference between the Title I SNS methodology and the Basic Education Program (BEP) formula? Is it by per pupil or enrollment?

The BEP is a funding formula provided to the district, and each district has the flexibility in determining the most appropriate use of state funds. There is flexibility within the formula on how BEP funds are used. The BEP may be utilized as a starting point for the methodology, but the methodology is the actual system by which funds are awarded to each school. The BEP formula is generated based on the district as a whole, whereas the SNS methodology is at the school level.

7. What districts are exempt from providing the methodology?

Districts with one school or one school per grade band are exempt from providing a methodology.

8. If the district is only serving (with Title I funds) one grade span (e.g., K-4), does the written methodology have to address middle and high school?

Yes; unless your district has only one school OR only one school per grade span, districts must submit a written methodology for all schools in the district, even if only one school is being served with Title I funds. Additionally, districts must provide a methodology for all schools if there are multiple elementary schools and only one middle school and one high school.

9. If our system is exempt, do we upload a statement that explains why we are exempt?

Yes, a district that meets one of the exemptions does not need to provide a written methodology but should upload a letter on district letterhead explaining why no methodology is required.

10. When does the three-question, traditional specific-cost test for SNS remain?

The three-question SNS cost test remains for Title I funds in a set aside and/or expended for district-level instructional initiatives. Title I funds set aside at the district level may not be used to fund 1) state-mandated activities or requirements; 2) positions, initiatives, or other expenditures funded with state and local dollars in non-Title schools; or 3) positions, initiatives, or other expenditures funded with non-Title dollars in the preceding year.

11. Are there any exclusions of state and local funds from the methodology?

Districts may *exclude* **supplemental state and local funds** (state/local funds above the funding methodology) used for any program that meets the intent and purpose of Title I-A (Title I-like funds). In other words, although an LEA may not reduce its allocation of state and local funds to a Title I-A school because the school receives Title I-A money, ESSA requirements allow for a degree of flexibility when it comes to *supplemental* state and local funds. Additional information on Title I-like funds will be released in an upcoming document.

12. The methodology is due to be uploaded with final revision on Oct. 1; however, the district needs



to submit before. Is it okay to submit CFA budget revisions on Sept. 1 and then resubmit the budget revision to upload methodology?

Yes, the CFA can be submitted earlier and then resubmitted with a budget revision to include the methodology prior to Oct. 1. Please note: Final budgets cannot be approved without approval of this methodology.

13. Should pre-K be included in the methodology?

No, pre-K should not be included in the methodology unless there is a specific exception, as Title I serves ages 5-17, which is grades kindergarten through 12th grade. One exception would be if there is a pre-K program in every school that is funded through state and local funds. In this instance, the pre-K funding could and should be part of the methodology.

14. If a district has two schools, one serving grades K-5 and one serving grades 6-12, is it exempt?

Yes, districts that only have one school or one school per grade band are exempt from submitting a methodology.

15. Should benefits be included into the FTE salary methodology?

Yes, employee benefits should be included for FTEs. Benefits, however, should only include the individual employed by the school; the methodology should not consider additional family (or optional) benefits.

16. How has SNS changed from No Child Left Behind (NCLB) to ESSA for school-level expenditures?

	Schoolwide Before NCLB	Schoolwide After ESSA
SNS requirement	Title I-A <i>funds</i> must be supplemental.	Unchanged; three previous presumptions still do not apply
SNS test	Supplanting occurred if: A Title I-A school did not receive all of its state and local funds it would otherwise receive if it was not receiving Title I-A funds.	Supplanting occurred if: A Title I-A school did not receive all of its state and local funds it would otherwise receive if it was not receiving Title I-A funds.
How is compliance determined?	Specific cost test for school-level expenditures	Through the methodology
Allocability	Title I-A funds must be used to serve the purpose of Title I-A unless full consolidation with nonfederal funds	Title I-A funds must be used to serve the purpose of Title I-A unless full consolidation with nonfederal funds
Who may be served?	All students	All students



Item	Targeted Assistance Before NCLB	Targeted Assistance After ESSA
SNS requirement	<i>Activities</i> must be supplemental.	Title I-A <i>funds</i> must be supplemental; three previous presumptions no longer apply.
SNS test	The three previous presumptions are that supplanting occurred if: 1. An activity is required by federal, state, or local law. 2. An activity was paid for with state or local funds in the prior year. 3. The same services were provided for Title I-A students that state and local funds support for non-Title I-A students.	Supplanting occurs if: A Title I-A school does not receive all of its state and local funds that it would otherwise receive if it was not receiving Title I-A funds.
How is compliance determined?	Specific cost test for school-level expenditures	Through the methodology
Allocability	Title I-A funds must be used to serve the purpose of Title I-A.	Title I-A funds must be used to serve the purpose of Title I-A.
Who may be served?	Only students identified as at-risk may receive benefits from Title I-A funds.	Only students identified as at-risk may receive benefits from Title I-A funds.