Title I-A Supplement not Supplant Flow Charts

**LEA Level Title I-A Funds**

**Are we Supplementing or Supplanting?**

- **YES**
  - Does the LEA plan to use LEA level funds (general/state/local or federal) for its initiative?
  - What type of funds does the LEA plan to use?
    - General, state and local only
    - Federal only
    - Combination of general/state/local and federal funds
  - Will the cost be paid for non-Title I-A schools with nonfederal funds and Title I-A schools with federal funds?
    - **YES**
      - Are the nonfederal funds Title I-A like funds? Title I-A like funds are supplemental state and local funds used for any program that meets the intent and purpose of Title I-A.
        - **YES**
          - Not Supplanting (Costs must still be allowable)
        - **NO**
          - Supplanting
    - **NO**
      - Are non federal funds distributed to schools on the same basis to Title I-A schools and Non-Title I-A schools?
        - **YES**
          - Not Supplanting (Costs must still be allowable)
        - **NO**
          - Supplanting

**An LEA would like to use Title I-A funds to pay for a purchase or activity in a Title I-A school. Is this allowable?**

- **YES**
  - Does it serve the purpose of the Title I-A?
  - Does it meet basic factors for allowability: Necessary, Reasonable, Allocable? (See 2 CFR 200.403)
    - **YES**
      - Is it a Schoolwide or Targeted Assistance Program?
        - **Schoolwide (SW)**
          - Is it included in SW plan or annual evaluation plan?
            - **NO**
              - Not ALLOWABLE
            - **YES**
              - ALLOWABLE
        - **Targeted Assistance**
          - Are you serving only eligible students, AND only a proportional share is paid out of Title I-A funds?
            - **YES**
              - ALLOWABLE
            - **NO**
              - Not ALLOWABLE
    - **NO**
      - Does it serve the purpose of the Title I-A?
        - **NO**
          - Is it a Schoolwide or Targeted Assistance Program?
            - **Schoolwide (SW)**
              - Is it included in SW plan or annual evaluation plan?
                - **NO**
                  - Not ALLOWABLE
                - **YES**
                  - ALLOWABLE
            - **Targeted Assistance**
              - Are you serving only eligible students, AND only a proportional share is paid out of Title I-A funds?
                - **YES**
                  - ALLOWABLE
                - **NO**
                  - Not ALLOWABLE
School Level Initiatives Using Title I-A Funds
Are we Supplementing or Supplanting?

At a school level, the LEA is not required to demonstrate that an individual costs or service is supplemental. The LEA is required to demonstrate the methodology (way/logic) used to ensure that all schools received all of the general, state and local funding they would otherwise received regardless of each school’s Title I-A status.

For Example:

Supplementing (example)

The LEA has 10 schools. Four (4) Title I-A and Six (6) non-Title I-A

The LEA uses its general, state and local funding to ensure that each school has enough funds to pay for one (1) teacher for every 30 students or up to 20 teachers total.

Funding: All 10 schools received all of the general, state and local funding based on this methodology.

Knowing that each Title I-A school received all of its general state and local funds regardless of its Title I-A status, each school may use its Title I-A funds even for:

1) An activity required by federal, state, or local law. 2) An activity that was paid for with state or local funds in the prior year. 3) The same services for Title I-A students that state and local funds support for non-Title I-A students.

In this example, the LEA has met the SNS test. When the LEA starts using Title I-A funds to pay for a purchase or service, the LEA still has to ensure that an individual cost or service is allowable, necessary and reasonable. See the Allowability Chart.

Supplanting (example)

The LEA has 10 schools. Four (4) Title I-A and Six (6) non-Title I-A

The LEA uses its general, state and local funding to ensure that each school has enough funds to pay for one (1) teacher for every 30 students or up to 20 teachers total.

Funding: Six (6) non-Title I-A schools received general state and local funds to pay for 20 teachers.

The remaining four (4) Title I-A schools received general state and local funds to pay for 15 teachers because other teachers were paid with Title I-A funds. These schools are already using Title I-A funds to pay for five (5) teachers so they don’t need the general, state and local funds to cover those additional teachers.