

Title I Part A

Supplement not Supplant

Guidance for Illinois Local
Education Agencies

February 2025

Introductions

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1. Title I, Part A SNS Compliance Under ESSA
2. Exemption Under Title I, Part A SNS
3. Resource Allocation Methodologies (RAM): Requirements & Components
4. Using a RAM as a Strategic Opportunity
5. Technical Assistance and FAQ

Special Note

The supplement not supplant (SNS) requirements discussed in this presentation apply **only** to Title I, Part A and Section 1003 School Improvement grants.

Supplement not supplant provisions for other federal grants remain unchanged.

Title I, Part A SNS Compliance Under ESSA

How has supplement not supplant compliance for Title I, Part A changed under ESSA?

Title I, Part A SNS: Consistent Statutory Language

The general requirement for supplement not supplant under Title I, Part A remains unchanged under ESSA. That requirement is:

SUPPLEMENT NOT SUPPLANT IN GENERAL

A State educational agency or local educational agency shall use Federal funds received under [Title I, Part A] only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under [Title I, Part A], and not to supplant such funds.

(ESEA section 1118(b)(1))

Previous SNS Test: Individual Expenditures or Services

Supplanting presumed if Title I used for:

An activity required under Federal, State, or local law

An activity that was paid for using State/local funds in prior years

The same services for Title I students that State and local funds support for non-Title I students

Special Rule: No More Presumptions

SPECIAL RULE

No local educational agency shall be required to—

- A. Identify that an individual cost or service supported under [Title I, Part A] is supplemental; or
- B. Provide services under [Title I, Part A] through a particular instructional method or in a particular instructional setting in order to demonstrate such agency's compliance with [the supplement not supplant requirement].

(ESEA section 1118(b)(3))

ESSA's Revised SNS Compliance Test

However, the method for demonstrating compliance with Title I, Part A SNS did change under ESSA

ESEA section 1118(b)(2) clarifies how LEAs now meet the SNS requirement for Title I, Part A funds:

COMPLIANCE

To demonstrate compliance with [the supplement not supplant requirement], a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving [Title I, Part A funds] ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving [Title I, Part A funds].

(ESEA section 1118(b)(2))

What does Title I Neutral mean?

- **Title I Neutral:** When LEAs distribute state and local funds to schools without regard to their Title I status (neutrally).
- Using a documented allocation methodology, LEAs show that the method they use to allocate resources is Title I neutral.
- This ensures that students participating in Title I, Part A programming receive federal funding in addition to and not in place of state and local funding.

Promoting Effective Use of All Funding

"This change will help foster more effective spending across all funding sources. No longer should any school district feel pressure to use Title I funds on only those items or services that seem "extra" in an effort to reduce audit risk. Instead, every school district can effectively use its Title I funds as part of a comprehensive system of support that spans multiple funding sources in order to help the students most in need."

U.S. Department of Education Non-Regulatory
Guidance (2019)

In Summary, Under ESSA:

No LEA is required to identify that an individual cost or service funded by Title I, Part A is supplemental;

No LEA must provide services under Title I, Part A through a particular instructional method or setting to demonstrate compliance with the SNS requirement;

Non-Exempt LEAs must maintain a Resource Allocation Methodology (RAM) used to allocate state and local funds to schools; and

The RAM **must be Title I neutral.**

Exemption Under Title I, Part A SNS

Who is exempt from the Resource Allocation Methodology requirement? How do exempt LEAs document compliance?

Exemption Criteria

An LEA is not required to document its RAM for purposes of compliance with Title I, Part A SNS if:

1. The LEA has only one school,
2. The LEA has all Title I schools, or
3. All grade spans are exempt. A grade span is exempt if:
 - a) A grade span has a single school,
 - b) All schools in the grade span are Title I schools, or
 - c) All schools in the grade span are non-Title I schools.

Exempt or Non-Exempt?

Example	Exempt/Not Exempt	Reason
Single-Site LEA	Exempt	The LEA only has a single school.
Elementary School Middle School High School	Exempt	Each grade span has a single school.
3 Elementary Schools, all Title I 2 Middle Schools, all Title I 1 High School, Not Served	Exempt	Though there are multiple elementary schools and middle schools, all are Title I. The high school is the only site in its grade span.
2 Elementary Schools, Title 1 1 Elementary School, Not Served 2 Middle Schools, Title I 2 High Schools, Title I	Not Exempt	There are both Title I, Part A schools and non-Title I, Part A schools in the elementary category, so the LEA is not exempt. Therefore, the LEA must have a RAM for elementary sites. However, since both the middle school and high school sites are all Title I, the LEA is exempt from maintaining a RAM for middle school and high school sites.

Exempt but Compliant with SNS

LEAs that satisfy the exemption criteria are exempt from maintaining a Resource Allocation Methodology, but they are **not exempt from supplement not supplant.**

Acknowledging Compliance for Exempt LEAS



Determine whether the LEA is exempt from maintaining a RAM, using criteria outlined in the Title I, Part A SNS Guidance.



Navigate to the annual ESEA of 1965 as Amended Application. Check and sign the Program Assurances to assure compliance.



Maintain documentation of exemption from RAM. See Appendix C of the SNS Guidance for an example.

[See page 3 of the SNS Guidance for exemption criteria.](#)

Documenting Exemption

- Exempt LEAs also must maintain some documentation of their exemption. An example form is shown here. (See ISBE SNS Guidance Appendix C.)

Statement of Exemption

School Year:
LEA Name:
RCDT:

Title I, Part A, Supplement Not Supplant Compliance Requirement

Under ESSA Title I, Part A, the LEA must either demonstrate a valid SNS methodology that is used to allocate state and local funds to schools or have a Statement of Exemption.

Statute: *All LEA shall use federal funds received under this part only to supplement the funds that would, in the absence of such federal funds, be made available from state and local sources for the education of students participating in programs assisted under this part, and not to supplant such funds.*

The LEA, named above, will not be required to demonstrate a methodology for allocating its state and local funds for the reason indicated below:

- The LEA has only one school.
- All schools in the LEA are Title I schools.
- The LEA has only one school in each category (elementary school, middle school, high school).
- All school categories are exempt, either because all schools are Title I schools, all are non-Title I, or the category has just a single school.

School Name	RCDTs	Grades	Title I [Y/N]

[Attach a list of schools if more space is required.]

Printed Name of Authorized Official _____ Date _____

Signature of Authorized Official _____ Date _____

Resource Allocation Methodologies: Requirements & Components

For non-exempt LEAs, what are the suggested components of a Resource Allocation Methodology?

RAM Components

School enrollment and Title status

Statement of methodology

Criteria used in methodology

Mathematical calculation

State and local funds withheld from RAM

Assurances

School Enrollment and Title Status

- **School enrollment data:** LEAs should use the same enrollment data they use to allocate funds annually (projections or prior year data).
- **Title status:** LEAs should also indicate Title status for each school.

Example LEA		
School	Total Enrollment	Title I Status
Elem A	350 students	Schoolwide program
Elem B	375 students	Schoolwide program
Elem C	325 students	Not served
Middle A	450 students	Targeted assistance program
Middle B	500 students	Not served
High	975 students	Not served

Statement of Methodology

LEAs should state:

- a. The type of methodology used (per-pupil, weighted per-pupil, or personnel and non-personnel costs); and
- b. Whether the allocation method was determined on a districtwide basis or by school category (elementary vs. high school).

Example statement: The Example LEA uses a weighted student funding formula to allocate state and local dollars to schools based on student characteristics. The allocation method is applied on a districtwide basis.

Criteria Used in Methodology

LEAs should clarify the criteria used to distribute state and local funds to schools.

- This could include LEA per-pupil amounts, weights by student category, personnel categories, etc.

Criteria used in Methodology (Example)

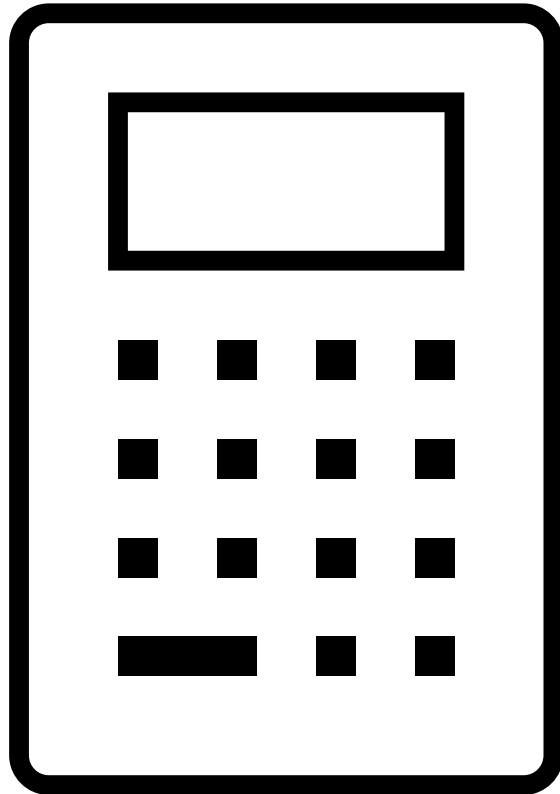
Example LEA 1: Student Group Allocations

Student Group	Allocation
All students	\$9,000
Students w/ low-income backgrounds	\$250
English learners	\$500
Students with disabilities	\$1,500
Preschool students	\$8,500

Example LEA: Student Group Enrollment Information

School	Students with low-income backgrounds	English learners	Students with disabilities	Preschool students
Elem A	175 students	62 students	28 students	14 students
Elem B	150 students	45 students	41 students	18 students
Elem C	195 students	75 students	30 students	12 students
Middle A	250 students	100 students	50 students	N/A
Middle B	175 students	25 students	29 students	N/A
High	390 students	40 students	32 students	N/A

Mathematical Calculation



LEAs should apply the methodology and criteria to demonstrate how they arrived at the total allocation of state and local funds for each school in the LEA.

Mathematical Calculation (Example)

Category Allocation	Allocation Amt.	Elem A	Elem B	Elem C	Middle A	Middle B	High	Total
All students	\$9,000,000	\$3,150,000	\$3,375,000	\$2,925,000	\$4,050,000	\$4,500,000	\$8,775,000	\$26,784,000
Students w/ low-income backgrounds	\$250,000	\$43,750	\$37,500	\$48,750	\$62,500	\$43,750	\$97,500	\$334,000
English learners	\$500,000	\$31,000	\$22,500	\$37,500	\$50,000	\$12,500	\$20,000	\$174,000
Students with disabilities	\$1,500,000	\$42,000	\$61,500	\$45,000	\$75,000	\$43,500	\$48,000	\$316,500
Preschool students	\$8,500,000	\$119,000	\$153,000	\$102,000				\$382,500
Total state and local funds allocated to schools		\$3,383,750	\$3,649,500	\$3,158,250	\$4,237,500	\$4,559,750	\$8,940,500	\$27,991,000
Withheld funds	Expenditures from state and local funds for special education costs not covered above. Operations & Maintenance, Transportation, and Support Services not included above.							\$20,209,000
Total state and local								\$48,200,000

State and Local Funds Excluded from School Allocations

Resources may be withheld from school allocations in two scenarios:

1. The resources are not allocated to schools, such as expenditures for district-wide activities like transportation. **These resources must still be used in a manner that does not consider Title status.**
2. Supplemental State and local funds used for programs that meet the “intent and purpose of Title I, Part A.”

Example of Scenario 2: An after-school program that supports at-risk youth meets the intent and purposes of Title I, Part A; therefore, such a program could be funded with state and local funds in a non-Title I school while leveraging Title I funds at a Title I school. Costs related to the after-school program in question would be excluded from a LEA’s SNS methodology calculation.

We encourage LEAs to review ISBE's guidance for a more thorough discussion of this topic.

Assurances

The LEA should include a statement of assurance that state and local funds are allocated in accordance with the stated resource allocation methodology and that any state and local funds not allocated to schools within methodology are used without regard to Title I status.

Example Assurance: State and local funds are allocated in accordance with the weighted student funding methodology. Any state and local funds not allocated to schools within this methodology are used without regard to each school's Title I status.

LEA Example: Staff Salaries and Supplies

School Enrollment & Title Status:*

School	Total Enrollment	Title I Status
Elem A	350 students	Schoolwide program
Elem B	375 students	Schoolwide program
Elem C	325 students	Not served
Middle A	450 students	Targeted assistance program
Middle B	500 students	Not served
High	975 students	Not served

* This is the same LEA shown in the previous example.

Statement of Methodology: The Example LEA allocates state and local resources to schools using defined staff ratios and a per-pupil supply amount. For staffing, the LEA uses the LEA salary schedules or the average district-wide salary for each category of school personnel. For non-personnel allocations, such as supplies, an LEA would use a define amount that it allocates on a per-pupil basis. The allocation method is applied on a districtwide basis.

LEA Example: Staff Salaries and Supplies

Criteria used in Methodology:

Staff Category	Allocation
Principal (1 per school)	\$120,000
Dean of Students (2 per HS)	\$60,000
Librarian (1 per school)	\$80,000
Guidance Counselor (2 per school)	\$85,000
Nurse (1 per school)	\$62,000
Reading Specialist (1 per Elem and MS)	\$80,000
Teacher (1 per 20 students)	\$75,000

LEA Example: Staff Salaries and Supplies

Mathematical Calculation:

Category Allocation	Allocation Amt.	Elem A	Elem B	Elem C	Middle A	Middle B	High	Total
Principal (1 per school)	\$120,000	\$120,000	\$120,000	\$120,000	\$120,000	\$120,000	\$120,000	\$720,000
Dean of Students (2 per HS)	\$60,000						\$120,000	\$120,000
Librarian (1 per school)	\$80,000	\$80,000	\$80,000	\$80,000	\$80,000	\$80,000	\$80,000	\$480,000
Guidance Counselor (2 per school)	\$85,000	\$170,000	\$170,000	\$170,000	\$170,000	\$170,000	\$170,000	\$1,020,000
Nurse (1 per school)	\$62,000	\$62,000	\$62,000	\$62,000	\$62,000	\$62,000	\$62,000	\$372,000
Reading Specialist (1 per Elem and MS)	\$80,000	\$80,000	\$80,000	\$80,000	\$80,000	\$80,000		\$400,000
Teacher (1 per 20 students)	\$75,000	\$1,312,500	\$1,406,250	\$1,218,750	\$1,687,500	\$1,875,000	\$3,656,250	\$11,156,250
Instructional Equipment & Supplies	\$850 per student	\$297,500	\$318,750	\$276,250	\$382,500	\$425,000	\$828,750	\$2,528,750
Total state and local funds allocated to schools		\$2,122,000	\$2,237,000	\$2,007,000	\$2,582,000	\$2,812,000	\$5,037,000	\$16,797,000
Midfield funds	Expenditures from state and local funds for special education, Operations & Maintenance, Transportation, and Support Services not included above.							\$31,403,000
Total state and local								\$48,200,000

LEA Example: Staff Salaries and Supplies

***State and local funds not allocated to schools in the RAM:** Note that, while the same LEA with the same total amount of state and local funds was used for both examples, the first example includes allocates more state and local resources to schools.

Assurance: State and local funds are allocated in accordance with a staff salaries and supplies methodology. Any state and local funds not allocated to schools within this methodology are used without regard to each school's Title I status.

Validating the RAM with the Budget

- The LEA budget can be used to ensure the RAM is accurately capturing all state and local resources
- Total budgeted expenditures from state and local sources should be the sum of planned expenditures from Funds 10, 20, 40, 50, and 80 using state and local sources only
 - Exclusions are generally consistent with Site-Based Expenditure Report: Funds 30, 60, 90, Function 3000, and so on.
- Depending on the methodology used, there will be some variance between the RAM and the budget. LEAs should be able to account for the variance, if any.
- **More information on validating the RAM with the budget can be found in ISBE's Title I, Part A Supplement Not Supplant Guidance**

Acknowledging Compliance for Non-Exempt LEAs

It is the LEA's responsibility to review and maintain a RAM – it is not submitted to ISBE.



Determine whether the LEA is exempt from maintaining a RAM, using criteria outlined in the Title I, Part A SNS Guidance



Navigate to the annual ESEA of 1965 Amended Application. Check and sign the Program Assurances to assure compliance.



Maintain documentation of a Resource Allocation Methodology. Revisit the RAM on an annual basis.

Revisions to RAM

LEAs must review the RAM annually to confirm that the documented methodology reflects the actual allocation methodology for state and local dollars

If an underlying assumption changes during the school year (e.g., enrollment), LEAs do not need to revise the RAM. Compliance should be tested once annually, not continuously demonstrated throughout the school year

Using a RAM as a Strategic Opportunity

How can the RAM be more than a compliance exercise? Can the RAM facilitate greater transparency and collaboration?

A RAM Can Help LEAs:



Compare intended allocations with actual spending to ensure equity and alignment with strategic priorities.



Demonstrate financial commitments to strategic goals.



Engage stakeholders in financial decision-making and communicate resource distribution decisions with the public.

Transparency and Collaboration

Engage Stakeholders

- Development of the RAM can be incorporated into other budgetary conversations and consultations.

Communicate with the Public

- Clear documentation and mathematical formulas also make it easier for LEAs to be transparent about resource allocation and to build ongoing trust for community financial discussions.

Demonstrating Equity

A transparent RAM can assist the LEA in demonstrating a commitment to equitable resource allocation, such as:

- Weighted student funding formulas that vary funding based on student need.
- Staffing allocations that provide additional resources to high-need schools.

Technical Assistance and FAQ

What resources are available to support LEAs in developing a RAM?

Frequently Asked Questions

- The FAQ included in this presentation is an abbreviated version of the FAQ in ISBE's SNS Guidance document. Please reference it for additional questions and detailed answers.
- Have a question we did not answer? Email us at lcorry@isbe.net and imonagha@isbe.net

Frequently Asked Questions

Q: If an LEA's RAM is Title I neutral, may schools use Title I, Part A funds on costs that would previously have violated the supplanting presumptions?

A: Yes. No LEA may be required to use the three presumptions of supplanting that were traditionally used to determine if a specific use of Title I, Part A funds was supplemental. The RAM requirement replaces the three presumptions; once a Title I neutral RAM is in place, the use of Title I, Part A funds may not be subjected to further SNS testing. However, expenditures still must meet the criteria for allowable use.

Frequently Asked Questions

Q: Can an LEA use a combination of methodologies in its RAM?

A: Yes. An LEA can use multiple methodologies to allocate state and local dollars to schools. LEAs may consider allocating funds differently based on grade span, for example.

Q: Does an LEA need to develop a new methodology for allocating resources to comply with Title I, Part A SNS?

A: No. LEAs are free to use existing Resource Allocation Methodologies, provided they are Title I neutral and based on state and local funds only.

Frequently Asked Questions

Q: An LEA's RAM uses average salary figures when allocating staff to schools. As a result, the sum of the state and local resources in its RAM does not match budgeted state and local expenditures. What level of variance is acceptable when comparing state and local resources in the RAM and in the LEA budget?

A: ISBE does not have a threshold for an acceptable level of variance. LEAs have flexibility when developing a methodology for allocating state and local funds to schools, including by basing allocations on average salaries. As a result, there may be considerable variance between the RAM and the total state and local resources included in the LEA budget. An LEA should be able to account for those differences and maintain appropriate documentation to demonstrate that it has allocated all state and local resources to schools in alignment with its methodology.

Frequently Asked Questions

Q: Are LEAs required to submit a RAM to ISBE annually?

A: No. LEAs must check the Program Assurances page of the annual ESEA of 1965 as Amended Application to demonstrate compliance. LEAs should be prepared to provide documentation of an up-to-date RAM upon request (e.g., during monitoring).

Q: If an LEA is exempt from the comparability requirement, is it also exempt from the Title I, Part A SNS requirement?

A: Not necessarily. Comparability of services is different from the SNS requirement and thus exemption is not equivalent. See page 3 of the SNS Guidance for more information on exemption from maintaining a RAM.

Technical Assistance

- [Guidance \(Example RAMs included\)](#)
- [USDE Non-Regulatory Guidance \(2019\)](#)
- Luke and Isabel can be reached at lcorry@isbe.net and imonagha@isbe.net.

Thank you!