

The background features a collage of two images. The top-left portion shows a line of yellow school buses, with the number '32' visible on the front of the lead bus. The bottom-left portion shows a classroom with blue walls, decorated with colorful balloons and framed pictures. Several desks and chairs are arranged in the room.

# Title I, Part A District Coordinator Webinar

March 27, 2025

# Logistics

- Submit questions or comments in the chat or send an email to [erin.sudduth@education.ky.gov](mailto:erin.sudduth@education.ky.gov).
- The webinar will be recorded and posted on the Kentucky Department of Education's (KDE) [Title I Documents and Resources webpage](#).



# Recap from February Webinar

- Announcements
- Recurring reminders
  - Monthly spend-down reminders
  - In this month's Title I Newsletter
  - Suggested tasks for February
- Time and effort

# Agenda

- Upcoming virtual statewide federal programs training
- Recurring reminders
  - Monthly spend-down
  - In this month's Title I newsletter
  - Suggested tasks for March
- Supplement, not supplant

# Upcoming Statewide Federal Programs Training

- Virtual Statewide Federal Programs Training provided by [The Bruman Group](#).
  - No cost to districts.
  - Tentatively scheduled for June 17-18 (same content offered both days).
  - Training will benefit district staff who are responsible for the oversight and administration of federal education programs and compliance with legal requirements.
  - KDE strongly encourages the district superintendent, finance officer and federal programs coordinator to attend.
  - Registration information will be coming soon!

# Monitoring the Obligation of 310L Funds

Month	Total Approximate Percentage Obligated	Month	Total Approximate Percentage Obligated
July 2024	5.66%	March 2025	51%
August 2024	11.33%	April 2025	56.66%
September 2024	17%	May 2025	62.33%
October 2024	22.66%	June 2025	68%
November 2024	28.33%	July 2025	73.66%
December 2024	34%	August 2025	79.33%
January 2025	39.66%	September 2025	85%
February 2025	45.33%		



# Open Project Quick Reference Table

Year/Project	Period of Award	85% Obligation Deadline	All Funds Spent or Encumbered	Final Federal Cash Request Submission
<a href="#">Federal FY2022</a> GMAP: FY2023 Project 310J SY 2022-2023	July 1, 2022 – <del>Sept. 30, 2024</del> June 30, 2025	Sept. 30, 2023	<del>Sept. 30, 2024</del> June 30, 2025	<del>Nov. 15, 2024</del> Aug. 30, 2025
<a href="#">Federal FY2023</a> GMAP: FY2024 Project 310K SY 2023-2024	July 1, 2023 – Sept. 30, 2025	Sept. 30, 2024	Sept. 30, 2025	Nov. 14, 2025
<a href="#">Federal FY2024</a> GMAP: FY2025 Project 310L SY 2024-2025	July 1, 2024 – Sept. 30, 2026	Sept. 30, 2025	Sept. 30, 2026	Nov. 13, 2026

# In This Month's Title I Newsletter

- Make sure you didn't miss our [March Title I newsletter!](#)
  - Title I Data Collection and Reporting
  - Reviewing Open Title I, Part A Projects and Associated Deadlines
  - Ongoing Tasks: Help Future You!
  - Principal's Perspective: Using Your Comprehensive Support and Improvement Plan (CSIP) to Plan Title I Funds
  - Recurring articles
    - Open Title I, Part A projects and associated deadlines
    - Coordinator's year at a glance

# Year at a Glance: Suggested Tasks for March

- Prepare notification for participation letter for private/home schools to be sent out in the spring.
- Meet with principals of Title I schools to collect information on the use of funds to support Title I programs for the next funding application.
- Use available data (e.g., economically disadvantages, other low-income data or a combination of poverty indicators) to determine eligible schools for Title I services (for next school year).

# Supplement, Not Supplant

- Section 1118(b)(1) of the Every Student Succeeds Act (ESSA) states that Title I, Part A funds shall “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 supplement such funds.”
- Commonly referred to as “supplement, not supplant” (SNS)
  - Supplement = Add to
  - Supplant = Take the place of

# Demonstrating SNS Compliance

- The requirements to demonstrate compliance with SNS vary by program across ESSA.
- Title I, Part A SNS compliance changed under ESSA.
  - Simplified the compliance process
  - Reduced burden
  - Prioritized effective spending
  - Eliminated the cost-by-cost analysis
  - More objective

# The Old Way: SNS Presumptions

- Prior to ESSA, all Title programs evaluated each individual cost using three presumptions.
- Supplanting was presumed if Title funds were used for:
  - An activity required by another federal program or those required by state or local law.
  - An activity that was paid for with state or local funds in the prior year.
  - The same services for Title I students that state and local funds support for non-Title I students.
- **These presumptions no longer apply to Title I, Part A!**

# The New Way: SNS Methodology

- The new compliance method is outlined in ESSA 1118(b)(2).
- A local educational agency (LEA) must demonstrate that the methodology used to allocate state and local funds to schools is done in a Title I-neutral manner.
  - Title I schools must receive all the state and local funds they would otherwise receive if they were not participating in Title I.
  - A school's Title I status is not taken into consideration when allocating state and local funds.
- Compliance is demonstrated at only one point during the school year as the law supposes an annual allocation of state and local funds.

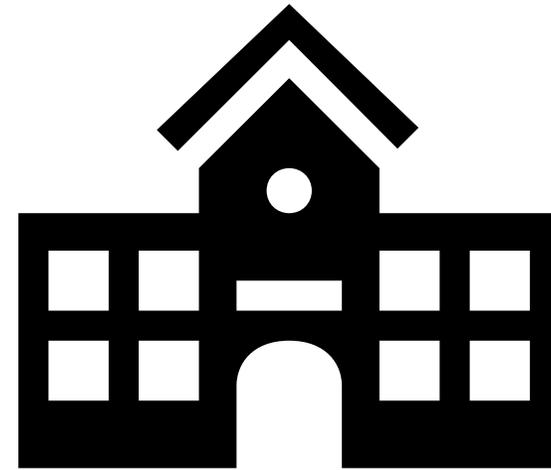
# Exceptions to the SNS Methodology Requirement

- An SNS methodology would not be required in the following scenarios:
  - A district with only one school (the district would be exempt as a whole);
  - A grade span with a single school (the single-school grade span would be exempt); or
  - A district which serves all schools with Title I allocations (the district would be exempt as a whole if every school is served. If all schools within a grade span are served, that grade span would be exempt.).

# Supplanting School Level Expenditures

Title I, Part A supplanting is dependent on how the district allocates state and local funds, not on how the school chooses to spend them.

If the district distributed state and local funds in a Title I-neutral manner, schools are meeting the SNS requirement.



# Don't Forget Allowability

- Although individual costs are not examined in relation to SNS, all Title I, Part A purchases must still be allowable.
  - Reasonable – Not excessive in cost
  - Allocable – Aligned with the program's intent and proportionally benefitting the program
  - Necessary – Essential for carrying out program implementation.
- Refer to KDE's [Allowable Cost Checklist and Procedures](#) for more information.

# Written Methodology

- Written narrative describing the manner(s) in which the district will distribute state and local funds and/or allocate resources backed by state and local funds (e.g., teaching positions).
  - Clarify the allocation steps to account for the distribution of all state and local funds for staffing, professional development, technology, etc.
  - Does not have to be lengthy
  - Supported by calculations using actual numbers
  - Documentation that the methodology is being followed at each school
- Narrative and supporting documentation should be completed by Sept. 30 of each school year kept on file at the district.
- Not submitted to KDE unless selected for monitoring.

# What to Include in the Narrative

- A brief explanation of what is included in the district's methodology (certified and classified staffing, instructional funds, technology funds, etc.).
- An explanation of how funds are distributed.
- The school year of the enrollment data being used in the calculations (if not clearly labeled).
- An affirmation that funds and staff were distributed according to the methodology.

# Funds to be Excluded from SNS Determination

- Resources not allocated to schools (districtwide activities)
  - Portion of funds retained at the district for personnel and non-personnel services that benefit all/multiple schools
- Federal funds under other programs
  - Titles II-V, Individuals with Disabilities Education Act, etc.
- Non-federal funds not allocated to schools by the district
  - Private contributions, fundraising, parent fees
- Supplemental state and local funds for programs that meet the intent and purpose of Title I, Part A.

# Using Supplemental Funds for Programs that Meet the Intent and Purpose of Title I

- Be implemented in a school where at least 40% of the children are from low-income families;
  - Be designed to promote schoolwide reform and upgrade the entire educational operation of the school to support student achievement toward meeting the state's challenging academic standards;
  - Be designed to meet the educational needs of all students in the school, particularly the needs of children who are failing, or most at risk of failing, to meet the state's challenging academic achievement standards; and
  - Use the state's ESSA assessment system to review the effectiveness of the program.
- Serve only students who are failing, or most at risk of failing, to meet the state's challenging student academic achievement standards;
  - Provide supplementary services designed to meet the special educational needs of students who are participating in the program to support their progress toward meeting the state's high academic standards; and
  - Use the state's ESEA assessment system to review the effectiveness of the program.

# Methodology Flexibility

- Districts can use multiple methodologies to demonstrate compliance with SNS requirements, provided they are Title I neutral and used consistently. For example:
  - One methodology for elementary schools and another methodology for middle and high schools.
  - One methodology across all grade spans but a factor such as the base allocation for students or the average cost of instructional materials varies depending on the grade range.

# Resources

- U.S. Department of Education's [Supplement not Supplant Non-Regulatory Informational Document](#)
- Supplement Versus Supplant section of the [Title I, Part A Handbook](#) (see p. 59)
- NEW resources from KDE available on the [Title I, Part A Documents and Resources webpage](#):
  - Title I, Part A Supplement Not Supplant Information document
  - Example Title I, Part A Supplement Not Supplant Methodology

# SNS Knowledge Check

1. A Title I school used some of its state funds to purchase a reading intervention program during the previous school year. Would it be supplanting if the school purchased the same reading intervention program using Title I, Part A funds for the upcoming school year?
2. A non-Title I school uses local funds to pay for math manipulatives. Could a Title I school use Title I, Part A funds to purchase the same math manipulatives or would that be considered supplanting?

# SNS Knowledge Check (2)

3. A district serves all five elementary schools with Title I, Part A funds but does not serve its two middle schools or one high school. Is this district required to develop an SNS methodology?
4. A district typically allocates \$70,000 in state funds for one instructional coach at each elementary school, but it doesn't allocate funds to Title I schools because they can use Title I funds to pay for the instructional coach. Is this supplanting?

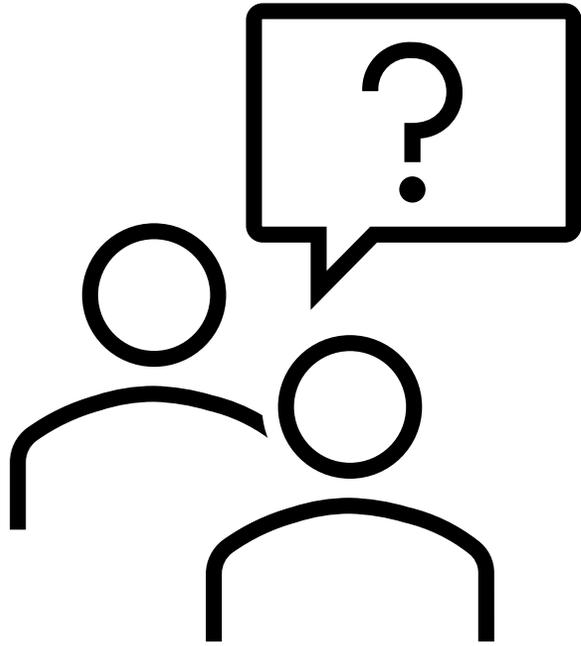
# SNS Knowledge Check (3)

5. The district has selected a new diagnostic assessment to use at all 10 elementary schools (five Title I and five non-Title I). The district retains a portion of state and local funds at the district level to cover the expense at the non-Title I schools. The Title I schools must use a portion of their Title I allocation to cover the cost. Is this supplanting?
6. The district allocates supplemental state and local funding in non-Title I schools to support after-school tutoring for students scoring below proficient on the state's math assessment. The district uses Title I funds to support tutoring for students scoring below proficient on the state's math assessment in its Title I schools. Is this supplanting?

# SNS Knowledge Check (4)

7. A non-Title I school uses funds from private contributions and fundraising to purchase new science lab equipment. A Title I school purchases the same science lab equipment using Title I funds. Is this supplanting?
8. The district allocates an additional \$5,000 of state and local funds to each school operating a Title I program. Is this supplanting?

# Questions?



- Use the Teams chat or email [erin.sudduth@education.ky.gov](mailto:erin.sudduth@education.ky.gov) with any questions on today's webinar.
- Your district's assigned [Title I consultant](#) is also available to answer any Title I, Part A program questions.

# Upcoming Webinar Dates

Mark your calendars for the next  
Title I, Part A webinar:

**Thursday, April 24**  
**10-11 a.m. ET**

Submit feedback and topic requests  
through the anonymous [Title I Monthly  
Webinar Feedback Survey](#)

## 2025 Webinar Schedule

May 29

June 26

July 31

Aug. 28

Sept. 25

Oct. 30

Nov. 20

Dec. 18



Kentucky Department of  
**E D U C A T I O N**