

Supplement, Not Supplant Policy and Procedures

To ensure that Title I Part A funds are used to provide services that are in addition to the regular services normally provided by a school district for participating children, the district must use these funds to supplement, not supplant regular non-Federal funds.

“Supplement, Not Supplant” procedures describe how the district ensures that Title I funds are used only to supplement, and not supplant, state and local funds that would, in the absence of Title I funds, be spent on Title I students.

This sample template is not an official Massachusetts Department of Elementary and Secondary Education document. It is provided only as an example.

The procedures below will assist the district in demonstrating that it uses Title I funds only to supplement, and to the extent practical, increase the level of funds that would, in the absence of Title I funds, be made available from non-Federal sources for the education of children participating in Title I programs.

The LEA and / or schools must demonstrate that Title I funds supplement those funds that are required to be provided to the schoolwide program and targeted assistance schools. Possible evidences include: school budgets, district budget, and back-up documentation demonstrating that the schools are receiving proper amount of funds for free public education, including funds for services for English Learners and Special Education students. All expenditures in SW and TA programs must be aligned to the comprehensive needs assessment and described in the written school plan.

Staffing

LEAs must maintain records that demonstrate that each Title I program receives staff services commensurate with the staff payment. Corroboration of records to what is actually taking place will be carried out through means such as spot-checks, reviews, interviews with staff, and interviews with students.

Evidence will include: (1) for 100% Title I-funded staff, the staff daily schedule of activities; for split-funded staff, staff daily schedule with clear delineation of time spent on the Title I program; and (2) other documentation that demonstrates accurate charges to the Title I program. (e.g., detailed position descriptions for split-funded staff).

Professional Development

LEA / School must maintain a description of the professional development provided at the district / school level that is funded with Title I funds. Possible evidence includes: A description of how professional development is aligned with the needs of Title I students and a sign-in sheet indicating participants (district staff will ensure the participating staff are those who teach or provide support to Title I participants). The professional development shall not duplicate that which the district provides for non-Title I purposes that, in the absence of Title I funds. (Descriptions of all other professional development will be available for review).

Parent and Family Engagement

LEA / School must maintain a description of the district / school parental engagement activities paid for by Title I funds. Evidence will include: A description of how parent and family engagement activities are aligned with the needs of Title I students and a list of participants, including signatures. The parent and family engagement activities shall not duplicate those that the district provides for non-Title I parents that, in the absence of Title I funds, would be provided to all parents. (Descriptions of all other parent and family engagement activities will be available).

Guidance and Counseling (if applicable)

The district and schools will demonstrate that guidance or counseling services paid for by Title I funds are provided to Title I participants and are supplemental to other available guidance and counseling services. Evidence will include: a list of participants (district staff will review to ensure they are Title I students) and a description of services that demonstrates they meet the needs of Title I students and parents. The guidance and counseling services do not duplicate those that, in the absence of Title I funds, would be provided to all students and parents. Schoolwide Programs The district and/or schools will demonstrate that Title I funds supplement those funds that are required to be provided to the schoolwide program schools. Evidence includes: the school budget; the district budget; and back-up documentation demonstrating that the schools are receiving proper amount of funds for free public education, including funds for services for LEP and Special Education students.

Schoolwide Programs

The district and/or schools will demonstrate that Title I funds supplement those funds that are required to be provided to the schoolwide program schools. Evidence includes: the school budget; the district budget; and back-up documentation demonstrating that the schools are receiving proper amount of funds for free public education, including funds for services for LEP and Special Education students.