

## Department of Grant Compliance and Administration

### Statewide Training Series

## Questions & Answers

**Training Title: Supplement, Not Supplant**

**Training Date: 5/25/2023**

*For additional information, please contact us at [ESSASupport@tea.texas.gov](mailto:ESSASupport@tea.texas.gov).*

---

**Question 1:** Are there templates available on what the written methodology for distributing state and local funds should look like?

**Answer 1:** Yes, there are examples and templates in the [Supplement, Not Supplant Handbook](#).

**Question 2:** What is the difference between comparability and SNS when it comes to comparing expenditures in state and local funds by campus?

**Answer 2:** The Comparability of Services requirement and the Supplement, Not Supplant requirement are both intended to ensure that Title I, Part A schools are getting their fair share of state and local resources, but they are each approaching it differently.

To demonstrate compliance with the Comparability of Services requirement, the LEA must pass one of three specific tests:

- Test 1: Comparison of State and Local Expenditures per Pupil
- Test 2: Comparison of Per Pupil Expenditures for State and Local Base Salaries
- Test 3: Ratio of Pupils to Non-Federally Funded Instructional Staff FTEs

The SNS methodology requirement for Title I assesses how the LEA allocates State and local funds to campuses. The LEA demonstrates compliance with the requirement by having a methodology that describes how it allocates State and local funds to all its campuses on an equitable basis, either districtwide or by campus category. The exemption rules for each requirement are different as well. Each requirement has been specifically addressed in non-regulatory guidance, and each describes different circumstances under which an LEA may be exempt or under which a campus or grade span can be excluded.

**Question 3:** How do we determine which section of the SNS provision applies to competitive grants?

**Answer 3:** The Request for Application (RFA) for the competitive grant will indicate whether the grant has a Supplement, Not Supplant provision.

**Question 4:** One of the presumptions of supplanting mentioned in the training is whether the activity/service provided with federal funds to some recipients and with state/local funds to other recipients. How does SNS factor into that? For example, if you are increasing, enhancing, or expanding the number of positions, training slots, etc., isn't this considered supplemental since you are supplementing what you can afford and do with local funds?

**Answer 4:** Let's go back to the layer cake analogy. The LEA is responsible for providing the base layer of the cake. Everybody is supposed to be entitled to the basic cake. If Title IV, Part A funds (for example) are used for more of the same service, the basic cake might be bigger, but there wouldn't be any icing. In order to be considered supplemental, the federal funds have to provide some other additional or enhanced service.

**Question 5:** If the district decided to not apply for the Mentor Allotment and it didn't simply "go away" on its own then would that be sufficient documentation to rebut the presumption of supplanting?

**Answer 5:** If a grant is not renewed, whether because the LEA chose not to apply or because the grant simply ended, the LEA can document that the funds are no longer available for use.

**Question 6:** Regarding the Statement of Exemption, could you help me understand the campus categories? What is the TEA definition of elementary, middle, high school and grades included?

**Answer 6:** Generally, "Elementary" is considered to be grades K-5; "Middle School" is considered to be grades 6-8; and "High School" is considered to be grades 9-12. LEAs that have other campus configurations can assign them to the category that is the best fit. For example, campuses that are for grades PK-2, or grades 4-6 would be in the Elementary category.

**Question 7:** On the split-funding question, would the LEA need to reserve the Title I, Part A funds on its ESSA application?

**Answer 7:** Anytime the LEA is reserving Title I, Part A funds for use at the LEA level, this should be reflected on the PS3101. The use of reserved funds must be indicated in the approved ESSA Consolidated Federal Grant Application.

**Question 8:** If an LEA eliminates a particular job type across all campuses due to budgetary constraints, may the position be picked up by a Title I campus if the position meets the requirements of the grant?

**Answer 8:**

**Question 9:** The Title IV FAQ dated Nov. 2022 states that CPR mannequins can be purchased by Title 4 funds as well as curriculum and supplies. Has this changed?

**Answer 9:** The Title IV FAQ document has recently been updated, and the new version reflects the fact that mannequins for CPR training cannot be purchased with Title IV, Part A funds.

**Question 10:** If a purchase that is typically through Title II and the expense had to be moved to local funds due to a procurement error does that mean the purchase can't be made with Title II the following year?

**Answer 10:** Without knowing what type of expense, how long it was paid for out of local funds, and what type of error it would be hard to say. If you will email us this question and provide more background information, we can give you a better response.

**Question 11:** Would a skipped campus still be considered not served?

**Answer 11:** A campus that is “Skipped” is not a Title I, Part A campus.