

\$ Supplement vs. Supplant

Perkins §311. FISCAL REQUIREMENTS.
“(a) SUPPLEMENT NOT SUPPLANT.— Funds made available under this Act for career and technical education activities shall supplement, and shall not supplant, non-Federal funds expended to carry out career and technical education activities and tech prep program activities.”

A State educational agency or local educational agency 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 non-Federal sources for the education of pupils participating in programs assisted under this part, and not to supplant such funds. §1120A of the Elementary and Secondary Education Act At its most basic, Title I’s supplement not supplant provision requires states and districts to use Title I funds to add to (supplement), and not to replace (supplant), the state and local funds they spend on education. In other words...

Title I funds are not meant to substitute for state or local funds, but rather provide an additional layer of support.

...Thus, states and districts are required to demonstrate that Title I funds are used to purchase extra services, staff, programs or materials the state or district would not normally provide.

Supplement not supplant is best understood as a fiscal test states and districts must apply to verify they are **spending Title I funds on extra costs**. It is one of three fiscal tests a school district must meet in order to spend Title I funds and each test operates differently.

Test 1 – Maintenance of Effort

The maintenance of effort provision focuses on spending at the school district level. To receive Title I funds **a district generally may not reduce the amount of state and local money it spends for public education from one year to the next**. This test looks at the total amount of state and local money a district spends each year.

Test 2 – Comparability

The comparability provision focuses on services supported at the school level with state and local funds and is a prerequisite for receiving Title I funds. To receive Title I funds, a district must verify it uses state and local funds to provide services in Title I schools that, taken as a whole, are **at least comparable to the services provided in schools that are not receiving Title I funds**.

Test 3 – Supplement not Supplant

The supplement not supplant provision focuses on individual costs as it is currently enforced. A state, district, or school that receives Title I funds **must verify all costs paid with Title I funds are additional to what the agency would otherwise provide** with state and local funds. This test looks at what the agency would have done in the absence of federal funds. At the school level, supplanting is analyzed differently in a Title I “targeted assistance” school versus a “schoolwide” school which is discussed in further depth in section IV.