

# Supplement *not* Supplant – SNS

## Student Support and Academic Enrichment (SSAE) Grant Title IV-A

### *What is SNS?*

What does supplement not supplant mean in the context of the SSAE program?

[Section 4110](#) requires that SSAE program funds be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under the SSAE program. This means that an SEA or LEA may not use SSAE program funds to carry out activities that would otherwise be paid for with State or local funds.

In determining whether a particular use of funds would violate the non-supplanting requirement, SEAs and LEAs should consider matters such as whether the cost involved is currently paid for using State or local funds or whether the cost involved is for an activity that is required by State or local law. In no event may an SEA or LEA decrease the amount of State or local funds used to pay the cost of an activity simply because of the availability of the SSAE program funds.

There is a presumption of supplanting if Federal funds are used for State-required costs or costs previously covered with non-Federal funds. The presumption may be overcome if the SEA or LEA is able to demonstrate through written documentation (e.g., State or local legislative action, budget information, or other materials) that it does not have the funds necessary to implement the activity and that the activity would not be carried out in the absence of the SSAE program funds.

### *Definitions*

**Supplement** – to add to; to enhance; to expand; to increase; to extend; to create something new

**Supplant** – to take the place of; to replace by something else

### *SSAE Facts*

- ✚ An LEA must generally be able to operate its schools and its core foundation programs without any federal funds.
- ✚ Federal grant funds may be used **ONLY** to supplement the educational programs generally offered with state and local funds.
- ✚ Federal grant funds may be used **ONLY** to provide supplemental services that would not have been provided had the federal grant funds not been available.

### *Presumption of Supplanting*

To help us determine allowability of an expense or activity, please respond to the three (3) Supplement not Supplant presumptions in the History Log or Program Narrative section:

- 1) Are the expenditures or activities required by other Federal, State or local laws?
- 2) Were the expenditures or activities funded in previous years by non-Federal funds?
- 3) Would the expenditures or activities happen in the absence of Federal funds?



## *Ask Yourself*

- ✓ If I did not have federal funds available to conduct this activity or service, would I still conduct it with state or local funds anyway?  
If the answer is yes, you are most likely supplanting because it is no longer a supplementary activity.  
You must be able to demonstrate that you could not conduct the activity if it weren't for the federal funds.
- ✓ Is the program required by federal, state or local law?  
If the answer is yes, you are most likely supplanting because the activity is required and not supplemental.
- ✓ Were local funds used to pay for the program in prior years?  
If the answer is yes, you are most likely supplanting because federal funds are being used to replace local funds and not to provide new opportunities.

## *Statutory References*

- [Non-Regulatory Guidance, Student Support and Academic Enrichment Grants](#)
- [Supplement Not Supplant - SEC. 4110. \[20 U.S.C. 7120\]](#)

Please feel free to contact a [Title IV-A Specialist](#) for more information or to discuss a specific situation or event. Our goal is to provide you with the support you need to successfully navigate and leverage these amazing, flexible funds.

