Title I Supplement, Not Supplant Policy and Procedures

Middlebury Community Schools Supplement, Not Supplant Policy and Procedures describes 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.

The procedures include a description of the means by which the policy is disseminated to personnel involved with Title I.

To ensure that funds made available under Title I Part A 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.

Title I funds may not take the place of—supplant—public education services that are to be provided to all students. The policies and 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.

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Supplement not Supplant
- Federal funds must be used to supplement and in no case supplant state and local resources
- “What would have happened in the absence of the federal funds?”

Presumptions of Supplanting [A-133 Compliance Supplement]
Presume supplanting occurred if federal funds are used to provide services that:
- Were required to be made available under other federal, state, or local laws;
- Provided with non-federal funds in prior years; or
- Were provided to participating children [i.e., Title I student], if those same services provided with non-federal funds to non-participating children

Exception: 1120A(d)
Exclusion of Funds:
- The District may exclude supplemental state or local funds used for program that meets intents and purposes of Title I Part A.
- i.e., “Title I Like” programs provided in building not eligible for Title I services

Middlebury Community Schools
Presumption Rebutted
- If the District demonstrates it would not have provided services if the federal funds were not available
- NO non-federal resources available this year.

What Documentation Is Needed?
- Fiscal or programmatic documentation to confirm that, in the absence of federal funds, the District would have eliminated staff or other services in question
- State or local legislative action
- Budget histories and information

Student Selection Criteria for Targeted Assistance Schools
**USDE Guidance:** In targeted assistance schools, the District may use 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 students participating in Title I programs. In no case may Title I funds be used to supplant (e.g., take the place of) funds from non-Federal sources.

In the instance of serving Targeted Assistance Schools, the following multiple, objective, educationally-related criteria are used by Middlebury Community Schools to select the eligible pool of Title I participants. Eligible students are those identified by the school as failing, or most at risk of failing, to meet the State’s challenging student academic achievement standards. If all eligible students cannot be served, schools shall select those most in need from this pool to be served. Schools may augment these examples of criteria, listed below, with additional objective, educationally-related criteria such as teacher-developed tests.

- Students who Did not Pass ________ [State Assessment]
- Students performing at the Bottom 25% and/or no growth the ________ [State Assessment]
- Students failing at least 75% of the 100 items on the State Assessment ________ [Applied Skills Assessment]
- Students in grades kindergarten through 2 performing below grade level on the ________ [NWEA]
- For students in grades preschool through grade 2, interviews with parents based on the District-developed parent interview guide for Title I student selection.

In addition to the students identified by the criteria above and any additional school selection criteria, the following students are automatically eligible for Title I services:

- A student who, at any time in the preceding 2 years, participated in a Head Start, Even Start, or Early Reading First program, or in Title I preschool services.
● A student who, at any time in the preceding 2 years, received services under Title I, Part C, Migrant Program.

● A student in a local institution for neglected or delinquent children and youth or attending a community day program for such children.

● A student who is homeless and attending any school in the district.

**Staffing**
The District will 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: 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 other documentation that demonstrates accurate charges to the Title I program. (e.g., detailed position descriptions for split-funded staff).

**Professional Development**
The District will maintain a description of the professional development provided at the District level that is funded with Title I funds. Evidence will include: A description of how professional development is aligned with the needs of Title I students and a list of participants. The professional development does not duplicate that which the District provides for non-Title I purposes that, in the absence of Title I funds, would be provided to all staff. (Descriptions of all other professional development will be available).

Schools will maintain or provide to the District a description of the school-level professional development paid for by Title I funds. Evidence will include (A) a description of how professional development is aligned with the needs of Title I/ at-risk students and (B) a list of participants (District staff will ensure participating staff are those who will impact Title I participants).

**Equipment**
The District will maintain a description and inventory of the equipment at the District level that is funded with Title I funds. Evidence will include: A description of how the equipment is aligned with the needs of Title I/ at-risk students and supports the Title I program[s]. The equipment does not duplicate that which the District provides for non-Title I purposes that, in the absence of Title I funds, would be provided for all programs and/or program administrators.
Schools will maintain or provide to the District a description of the school-level equipment paid for by Title I funds. Evidence will include (A) a description of how the equipment is aligned with the needs of Title I/ at-risk students, the Title I program (B) a list/ inventory of equipment (date of purchase; location; years of depreciation), and the Title I program (C) a label on the Title I equipment identifying it as “Title I” that aligns to the inventory.

**Parent/Guardian Involvement**

The District will maintain a description of the District-level parental involvement activities paid for by Title I funds. Evidence will include: A description of how parental involvement activities are aligned with the needs of Title I/ at-risk students and a list of participants (District staff will review to ensure they are parents of Title I students, although others may be invited to participate). The parental involvement activities do 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 parental involvement activities will be available).

Schools will maintain a description of school-level parental involvement activities paid for by Title I funds. Evidence will include: A description of how parental involvement activities are aligned with the needs of Title I/ at-risk students and parents and a list participants (District staff will review to ensure they are parents of Title I students, although all parents participate in School-wide).

**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/ at-risk students) and a description of services that demonstrates they meet the needs of Title I/ at-risk 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.

**Language Development (if applicable)**

The District and schools will demonstrate that Language Development services paid for by Title I funds are provided to Title I participants and are supplemental to other available language 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 language development services do not duplicate those that, in the absence of Title I funds, would be provided to all students and parents.
School-wide Programs

USDE Guidance: A school-wide program school is not required to select and provide supplemental services to specific children identified as in need of services. A school-wide program does not have to: (1) show that Federal funds used are paying for additional services that would not otherwise be provided; (2) demonstrate that Federal funds are used only for specific target populations; or (3) separately track Federal program funds once they reach the school. A school-wide program school must use Title I funds to supplement the amount of funds that would, in the absence of the Title I funds, be made available from non-Federal sources for that school.

The District and/or schools will demonstrate that Title I funds supplement those funds that are required to be provided to the school-wide program schools. Evidence includes: fiscal analysis only [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 ENL and Special Education students]; and use of Title I funds only to supplement the amount of funds that would, in the absence of federal funds, be made available from non-federal sources for the school.

Procedure for Dissemination

The Title I Director/Program Administrator will disseminate this written policy and procedure to all building administrators in Title I buildings in the District. Following such dissemination, the Title I Director/Administrator will meet with school administrators and all Title I-involved staff to ensure clear understanding of the concept of Supplement, Not Supplant and the procedures enacted to follow this policy.

I have reviewed and understand Middlebury Community Schools Supplement, Not Supplant Policy and Procedures and how the District and my Title I school 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.

Principal Signature: ________________________________ Date: ________

Retain one copy in your school’s electronic Title I handbook.
Send in the original to Mrs. Morgan on [date].