

Beaufort County School District

Supplement not Supplant Policy for Federal Programs (Title I, Title II, Title III, Title IV, etc.)

In addition to being reasonable and necessary, costs charged to federal grants can only supplement and not supplant local, district, or state funds. To supplement means to add to, to enhance or expand, and to supplant is to take place of something else.

Title I has slightly different supplement-not-supplant requirements, but for the purposes of Title II-A, Title III, and Title IV-A, it is presumed that supplanting has occurred if:

1. An LEA used federal funds to provide services that the LEA was required to make available under other Federal, State or local laws.
2. An LEA used federal funds to provide services that the LEA provided with non-federal funds in prior years.
3. An LEA used Federal funds to provide services that the LEA would otherwise provide without federal funds.

All costs must be: 1. Reasonable, Necessary, and Allocable 2. Consistently treated as either a direct cost or indirect cost 3. Conform with federal law and grant terms

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Local Education Agencies (LEA's) may use federal funds only to supplement or increase the level of funds that would, in the absence of Federal funds, be made available from non-federal sources for the education of students participating in Federal programs. Title I funds are not used to supplant funds received from state and local sources.

The following steps have been put in place to make sure Federal funds are supplemental:

- BCSD meet the state defined minimum program for staffing and program offerings (SC Code Section 59-20-20)

- Schools are funded with non-federal funds using a standardized staffing formula that is weighted to provide additional resources for students with disadvantages (EFA of 1977-Act 163)
- Comparability is completed annually to make sure Title I schools are receiving their “fair share” or more.
- Maintenance of Effort (MOE) is calculated annually for Title I and IDEA to prove that the school district is spending additional funds each year with non-federal funds.
- School plans in Title I are reviewed on two levels before being submitted to the state:
 - 1) **Finance** – to insure that funds are supplemental and allowable and
 - 2) **Instructional Services Department (ISD)** – to insure activities are in alignment with district and state goals and standards to ensure that the plans support students in meeting the state’s challenging performance standards,