Title I, Part A SNS Methodology: Guidance Revisions

The USDE has just issued its non-regulatory guidance document concerning the SNS Methodology requirement for Title I, Part A. TEA is in the process of revising its SNS Handbook to comply with this guidance and will make the Handbook available within the next two weeks. In the meantime, however, we want to highlight several points in advance of that availability so that LEAs can be aware of these changes that may affect their allocation planning:

- The USDE has determined that, although the Title I, Part C—Migrant statute does refer directly back to the Title I, Part A statute concerning the supplement, not supplant requirement, the flexibility offered by the SNS Methodology does NOT apply to the migrant program because the initial allocation of the Migrant funds are to the States, not to the LEAs.
- The SNS Methodology DOES apply to the School Improvement funds that are allocated under Section 1003(e)(2).
- LEAs with the following situations are exempt from the SNS Methodology requirement:
  - A single campus.
  - All of the campuses in the LEA are Title I, Part A campuses.
- No methodology is required for a grade span that has only one campus; a grade span that has only Title I, Part A campuses; or a grade span that has only non-Title I campuses.
- LEAs are not required to use the three presumptions of supplanting in order to comply with the SNS requirement for State/local funds that are reserved at the LEA level. Instead, the LEA must use such funds in a manner that does not take a school’s Title I status into account.
- LEAs may choose to use a staffing pattern to allocate State/local-funded positions (and their associated costs) to campuses; allocations to cover non-personnel costs may be a separate component of the methodology.
- LEAs may choose to allocate more State/local funds to a Title I campus on the basis of its being a Title I campus.
- LEAs that have in-district charter schools may choose to use a separate methodology to allocate State/local funds to its charter school campuses than it uses to allocate State/local funds to non-charter schools. The LEA must ensure that each methodology is Title I neutral.
- In order for Supplemental State/local funds to be excluded from the SNS Methodology, the funds must be used for activities that meet the intent and purposes of Title I, Part A.

NOTE: Because of the changes included in HB3, TEA staff advise including the allocation of SCE funds to campuses as a separate component of the SNS Methodology.