



Federal Program Compliance Division Program Monitoring Validations

Title I, Part A Supplement, Not Supplant Methodology

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Documentation Requested



Documenting overall compliance for a program requirement may require several forms of documentation to be maintained locally and available upon request by TEA and/or an auditor.

To ensure overall compliance with program requirements, LEAs should refer to the Program Guide and/or other program-related resources that reference the multiple forms of documentation required to be maintained locally.

The documentation requested for submission during the validation process may not include all forms of documentation that are required to be maintained locally.

Today's Agenda

- Title I, Part A – Supplement, Not Supplant Methodology
 - Program Requirements
 - Acceptable Documentation
 - Past Validation Issues
 - Examples
 - Resources Available



Title I, Part A—Supplement, Not Supplant (SNS)

SNS Methodology or Statement of Exemption

The LEA has either a formal Supplement, Not Supplant Methodology for distributing **State and local funds** in order to ensure that each Title I campus receives all the State and local funds that it would receive in the absence of Title I funds; or, it has a formal Statement of Exemption. [Section 1118(b)]

[Note: LEA selection will be based on response to question in Part D of SC5000.]

Title I, Part A—SNS

Documentation

Required for Item 1.1

Evidence of Methodology

Acceptable Documentation

- Copy of SNS Methodology for 2024-2025 school year.*

*Sample templates are available in the [SNS Handbook](#)

Title I, Part A—SNS

Documentation

Required for Item 1.1

Evidence of Methodology

Acceptable Documentation

- Copy of SNS Methodology*
 - Is the methodology Title I-neutral?
 - Does it describe how State/local funds are allocated to campuses?

*Sample templates are available in the [SNS Handbook](#)

Title I, Part A—Supplement, Not Supplant

Documentation Required – Item 1.1

Valid methodology



Issues that may result in an “Improvement Needed” status

- Auditable documentation requested was not submitted.
- Methodology is not Title I-neutral.
- Methodology is unclear.
- Exemption is not valid.
- Documentation not from school year requested.

Title I, Part A—SNS

Documentation

Required for Item 1.2

Evidence connecting
Methodology to campus
budgets

Acceptable Documentation

- Summary page(s) from general ledger for the applicable school year showing the total budget amount allocated to each campus.

Title I, Part A—Supplement, Not Supplant

Documentation Required – Item 1.2

Summary pages from general ledger showing state/local funds budgeted to campuses.



Issues that may result in an “Improvement Needed” status

- Auditable documentation requested was not submitted.
- Campus names/numbers and their corresponding state/local budget totals are not evident.
- Budgeted amounts not related to methodology submitted.
- Documentation not from school year requested.

Title I, Part A Supplement, Not Supplant Methodology

| Challenges Identified | Recommendation for Establishing Compliance |
|--|--|
| LEA was actually eligible for Statement of Exemption. | Although it is not wrong for an LEA that is exempt to have a written methodology for allocating its state and local funds to its campuses, it may be extra work. If the LEA chooses to have a Statement of Exemption, the LEA should ensure that it has selected “Statement of Exemption” in Part D of the SC5000 – Campus Selection schedule of the Consolidated Federal Grant Application. |
| The documentation submitted did not indicate a school year. | LEAs should review their Statement of Exemption or SNS Methodology each year and revise, as necessary. Campus status may change from year to year. Methodologies may change. Dates should always reflect current school year. |
| Pages from general ledger show only line-item expenditures, not total budgeted amounts per campus. | Compliance is determined based on budgets, not on expenditures. |

Documenting Connection to General Ledger

- **Relevant pages of Campus Budget Activity Report***

For validation, only submit 1 page per campus that is included in the SNS methodology. Must indicate the following for each campus:

- Campus Name/Number
- Original or Revised Budget amount

Fund Codes 199 (Districts) or 420 (Charter Schools)

*Name of report may vary, depending on LEA's system.

Sample Campus Report Page

3frbud12.p 69-4
05.19.06.00.00

09/25/19

Page: 7
3:47 PM

CAMPUS BUDGET ACTIVITY REPORT (Date: 9/2019)

| | | | | | | | | | | 2019-20 | 2019-20 | September 2019 | Encumbered | 2019-20 | 2019-20 | 2019-20 | 2019-20 | |
|--------------------------------------|-----------------|--|--|--|--|--|--|--|--|----------------|----------------|----------------|------------|----------------|---------------|----------------|-----------|--|
| Fnd T Fc Obj SO Org F Pr Own Act Obj | | | | | | | | | | Original Budge | FYTD Revised B | Monthly Activi | Amount | Batch Activity | FYTD Activity | Available Fund | FYTD % | |
| 005 | CAMPUS NAME | | | | | | | | | | | | | | | | | |
| ===== | | | | | | | | | | | | | | | | | | |
| 420 E 71 6523 01 005 0 99 090 000 | INTEREST EXPENS | | | | | | | | | | | | | | | 8,124.76 | -8,124.76 | |
| 6523 01 005 | INTEREST EXPENS | | | | | | | | | | | | | | | 8,124.76 | -8,124.76 | |
| ===== | | | | | | | | | | | | | | | | | | |
| 420 E 13 8299 01 005 0 11 041 000 | INTRCOM ADM FEE | | | | | | | | | 87,477.00 | 87,477.00 | | | | 14,985.22 | 72,491.78 | 17.13 | |
| 420 E 21 8299 01 005 0 11 041 000 | INTRCOM ADM FEE | | | | | | | | | 55,663.00 | 55,663.00 | | | | 9,237.14 | 46,425.86 | 16.59 | |
| 420 E 23 8299 01 005 0 11 041 000 | INTRCOM ADM FEE | | | | | | | | | 13,259.00 | 13,259.00 | | | | 2,154.64 | 11,104.36 | 16.25 | |
| 420 E 41 8299 01 005 0 11 041 000 | INTRCOM ADM FEE | | | | | | | | | 149,689.00 | 149,689.00 | | | | 25,966.88 | 123,722.12 | 17.35 | |
| 420 E 51 8299 01 005 0 11 041 000 | INTRCOM ADM FEE | | | | | | | | | 51,864.00 | 51,864.00 | | | | 9,063.38 | 42,800.62 | 17.48 | |
| 420 E 53 8299 01 005 0 11 041 000 | INTRCOM ADM FEE | | | | | | | | | 46,285.00 | 46,285.00 | | | | 8,097.28 | 38,187.72 | 17.49 | |
| 8299 01 005 | INTRCOM ADM FEE | | | | | | | | | 404,237.00 | 404,237.00 | | | | 69,504.54 | 334,732.46 | 17.19 | |
| ===== | | | | | | | | | | | | | | | | | | |
| 01 005 | *CAMPUS Name | | | | | | | | | 2,284,733.00 | 2,557,822.96 | 106,350.73 | 26,122.22 | 269,211.04 | 399,316.60 | 1,863,173.10 | 16.63 | |

Resources and Support

2025-2026 Program Monitoring Validations Process Online Resources



- **Overall Process Resources**

- 2025-2026 PMV Process Handbook
- Instructions for Submitting Documentation, Training Video, and Training Slides
- Navigating the Smartsheet WorkApp System Video

- **Program-Specific Resources**

- Guidance Documents for each Program/Requirement
- Training Videos and Training Slides for each Program/Requirement

[ESSA Program Monitoring Validations Webpage](#)

Federal Program Compliance Division

Program Monitoring Validations – Title I, Part A

ESSA Program Monitoring Validations Webpage

Guidance Document



Federal Program Compliance Division

TEA

2025-2026 Program Monitoring Validation Guidance Document

Program: Title I, Part A

Requirement: Supplement, Not Supplant Methodology

Documentation Requested

Documenting overall compliance for a program requirement may require several forms of documentation to be maintained locally and available upon request by TEA and/or an auditor. To ensure overall compliance with program requirements, LEAs should refer to the Program Guide and/or other program-related resources that reference the multiple forms of documentation required to be maintained locally. The documentation requested for submission during the validation process may not include all forms of documentation required to be maintained locally.

Please include the following selected documentation referenced in the table below to demonstrate compliance with the program requirement described. TEA will utilize the following table during the review of documentation to determine if the LEA submitted sufficient documentation to support LEA compliance.

The documentation submitted for TEA review should show evidence of compliance in the 2024-2025 grant year for the program requirement selected.

The following documentation is requested to be submitted by 5:00 pm CST on or before **December 19, 2025**, via the Federal Program Compliance Division Program Monitoring Validations SmartSheet WorkApp system.

| Selected Documentation Required to be Submitted for Review | Year of Documentation Requested | Description of Acceptable Documentation |
|---|---------------------------------|--|
| 1.1 The LEA has a formal Supplement, Not Supplant Methodology for distributing state and local funds in order to ensure that each Title I campus receives all of the state and local funds that it would receive in the absence of Title I funds. | 2024-2025 | <ul style="list-style-type: none"> Copy of SNS Methodology <ul style="list-style-type: none"> Is it Title I-Neutral? Does it describe how state/local funds are allocated to campuses? |
| 1.2 Evidence the LEA has allocated state and local funds to its campuses in accordance with its written methodology. | 2024-2025 | Copy of summary page(s) from general ledger showing the total state/local budget amount allocated to each campus. |

Federal Program Compliance Division

V1.0 07/14/2025

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Section 2102(B)(2)(C)

Federal Program Compliance Division

V1.0 10/14/2024

2

Federal Program Compliance Division

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Training Slides

TEA

Federal Program Compliance Division

Program Monitoring Validations

Title I, Part A

Supplement, Not Supplant

Methodology

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Training Video

TEA

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Program Monitoring Validations

Title I, Part A

Supplement, Not Supplant

Methodology

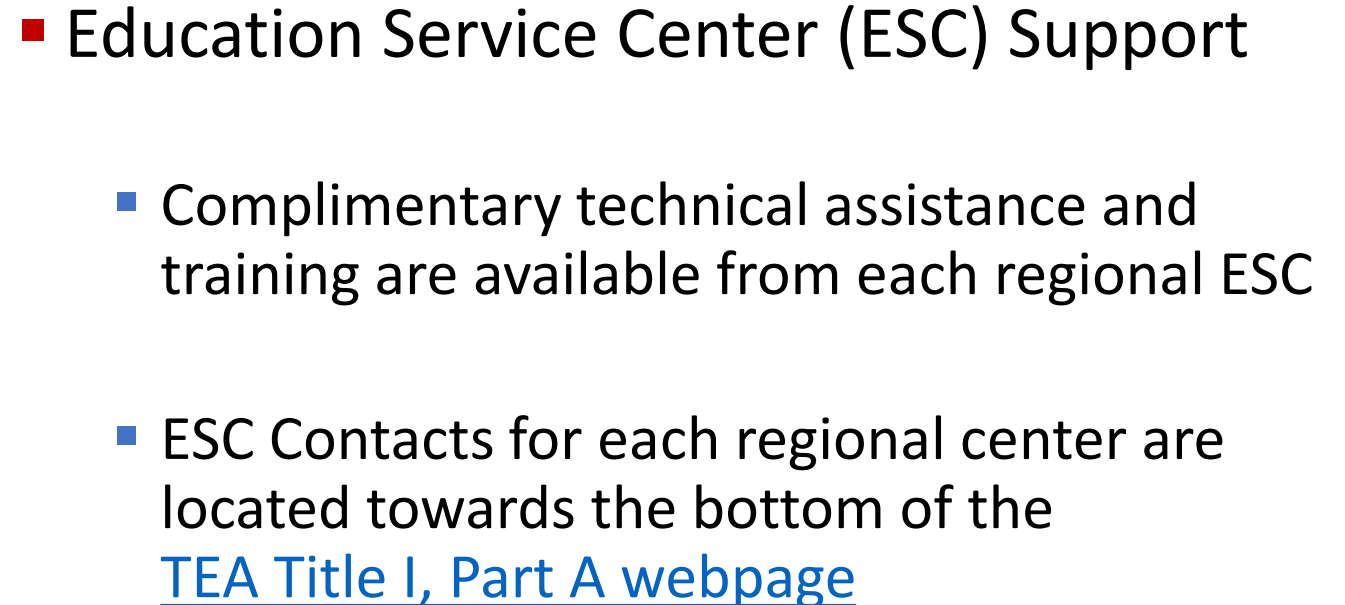
0:00 / 3:10

CC

Settings

Fullscreen

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Contact Information

Vivian Smyrl

Texas Education Agency

Vivian.Smyrl@TEA.Texas.gov

512-936-9216

Federal Program Compliance Division

ESSASupport@TEA.Texas.gov