Supplement vs. Supplant Guidance

The Education of Homeless Children and Youth (EHCY) funds are to be intentionally used to meet the unique educational needs of children and youth experiencing homelessness by eliminating barriers to enrollment, attendance, and academic success. Since children and youth experiencing homelessness comprise part of the aggregate student population, they must receive the same educational opportunities and services provided to all students. However, as children and youth experiencing homelessness may have needs for services that extend beyond those offered to other students, EHCY funds can be used to meet these needs.

Simply stated, the EHCY funds are to be used to provide supplemental or additional services to support the unique needs of children and youth experiencing homelessness. To this end, all Federal, State, and Local funding that can meet the needs of children and youth experiencing homelessness must be used *prior* to the EHCY

Supplement vs. Supplant

- **Supplement** the use of funds to pay for services that are *in addition* to those already provided by other funding sources
- Supplant the use of funds to pay for services that are provided by other funding sources
 - Supplanting under the McKinney-Vento Act means that recipients cannot use EHCY funds to pay for services that are required and/or funded by other Federal, State or Local funds (Sections 723(a)(2)(A)(iii), 723(a)(3), 42 U.S.C. § 11432(g)(4)).

It is the responsibility of the State Education Agencies (SEAs) and local operating agencies (LEAs) to ensure that the use of EHCY funds complies with statute. This requirement prohibits SEAs and LEAs from using EHCY funds to replace services that are otherwise available or required by other funding sources. To this end, SEAs are to examine the costs, programs, and services funded through the EHCY grant program to ensure that EHCY funds definitively supplement, not replace, all Federal, State, and Local funds and requirements.