

2014-
2015

Providence
Schools

PRINCIPAL REFERENCE GUIDE TITLE I BUDGET DEVELOPMENT

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Budget Planning Checklist

- I have reviewed and understand the Title I budget guidelines outlined in this reference book.
- I reviewed my Title I Budget Planning Toolkit and completed all of the required fields.
- I have aligned our school's Title I budget requests to successful implementation of activities identified in the School Improvement Plan (SIP).
- I have ensured that all activities identified in our SIP (that require additional funding) have been appropriately resourced.
- I have consulted with the School Improvement Team and/or the ILT in the development of our school's Title I budget.

- I set-aside at least 1% of my allocation for Parental Involvement.
 - Parent and community engagement strategies are included in our SIP
- I set-aside funding to support after-school tutorials.
 - Our SIP includes strategies to address student intervention opportunities.

Important Dates

April 1, 2014	Deadline for submitting the FY14-15 Title I discretionary budget on the U-Drive Your preliminary allocation was calculated at 85% of the FY13-14 discretionary allocation.
June 16, 2014	Final adjusted discretionary allocations to be released to schools by no later than July 12, 2014.
July 1 – August 23, 2014	Review of budget submission. Scheduling of individual meetings with Office of Federal Programs and Zone Executive Directors. Approved budget packets are issued. Please Note: You will not receive an approved budget packet until a budget is submitted and approved. This packet will include summary sheets with the FY14-15 account codes.
January 5, 2015	Date to submit any budget changes for the February 2015 amendment submission. No budget changes will be accepted after this date.
February/March 2015	On-going discussion of plans to obligate unused funds.
May 1, 2015	Final date to submit 2014/2015 requisitions for goods and services. Requisitions will NOT be accepted after this final date.
June 5, 2015	Deadline for all programs to end. This includes but is not limited to after school programs, after school teacher time, contracts with consultants, etc. All final after school payroll sheets must be submitted to the Grants Office by June 8, 2015.
June 5, 2015	Final invoices must be submitted to the district for payment of outstanding balances for goods and services. All PO cancellation forms must be received by this date. All purchase orders must be received in Lawson and/or liquidated by this date.

Dates may be subject to change – you will be notified in advance.

APPROVED TITLE I BUDGET PACKETS WILL BE RELEASED ONLY UPON THE FINAL APPROVAL FOR THE FULL DISCRETIONARY ALLOCATION BY THE EXECUTIVE ZONE DIRECTOR.

SY 2014-2015 Annual Overview

Month	Required Activity
July	<ul style="list-style-type: none"> • Check and balance Title I expenditures
August	<ul style="list-style-type: none"> • Check and balance Title I expenditures • Include Title I Component in the Strategic Plan for School Improvement • Include Parent Involvement Plan in the Strategic Plan for School Improvement • Include Staff Development Plan in the Strategic Plan for School Improvement • Participate in first SIP quarterly monitoring meeting
September	<ul style="list-style-type: none"> • Check and balance Title I expenditures • Hold annual Parent Meeting to explain Title I Program • Review/revise Parent Policy and the home-school compact • Collect "Evidence Sources" for Federal Audit • Complete Free and Reduced Meal Applications Continued development of the Title I School Improvement Plan • Submit requests to encumber funds
October	<ul style="list-style-type: none"> • Check and balance Title I expenditures • Submit requests to encumber funds
November	<ul style="list-style-type: none"> • Check and balance Title I expenditures • Submit 95% of final purchases for materials and supplies to Office of Grant Oversight • Benchmarking/progress monitoring attainment towards SIP objectives
December	<ul style="list-style-type: none"> • Check and balance Title I expenditures • Complete Free and Reduced Meal Applications
January	<ul style="list-style-type: none"> • Check and balance Title I expenditures • Benchmarking/progress monitoring attainment towards SIP objectives • Submit requests for budget changes to the Office of Grant Oversight for the January CRP amendment
February	<ul style="list-style-type: none"> • Check and balance Title I expenditures • Final purchases for materials and supplies are submitted to Office of Grant Oversight • Participate in SIP quarterly monitoring meeting
March	<ul style="list-style-type: none"> • Check and balance Title I expenditures • Check Title I fund balance
April	<ul style="list-style-type: none"> • Final opportunity to submit requisitions for goods and services • Finish collecting "Evidence Sources" for Federal Audit (T1 SWP/SIP implementation) • Check and balance Title I expenditures
May	<ul style="list-style-type: none"> • Be sure all Title I purchases have been completed and closed • Submit all time sheets, travel vouchers, etc. for final payment • Participate in SIP quarterly monitoring meeting • Submit annual evaluation of the Title I SIP to the Office of Federal Programs
June	<ul style="list-style-type: none"> • Deadline for all programs to end. This includes but is not limited to after school programs, after school teacher time, contracts with consultants, etc.

	<ul style="list-style-type: none">• Submit final invoices to the District for payment of outstanding balances for goods and services.• Submit all PO cancellation forms to Purchasing Department• Begin to plan for submission of FY16 Budget to the Office of Federal Programs
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Important note regarding purchases for goods and services greater than \$5,000.00

Per the City's Home Rule Charter, all purchases for goods and services over \$5,000.00 MUST BE COMPETITIVELY BID thru the City's Board of Contracts and Supply and also be approved by the Providence School Board. This process can take 8-10 weeks. It is important that you plan accordingly and submit budgetary requests in a timely manner and in ample time for the goods and services to benefit the students who are most at risk and most in need of benefiting from the Title I program. It is particularly important that you submit requests for technology purchases as soon as your school level budgets are approved as additional time is normally needed for the installation of technology-related equipment once the equipment arrives at your schools. As such, you are strongly encouraged to act as promptly as possible in securing goods and services over \$5,000, especially so for technology-related items, once your Title I school level budget is approved.

Please contact the district's Purchasing Administrator for questions/assistance pertaining to Board of Contracts and Supply approval.

Please contact your respective Zone Executive Director for questions/assistance pertaining to School Board approval and uploading information onto the Electronic School Board.

The Title I - 101

Frequently Asked Questions *General Questions and Answers about Title I*

Question 1: What is Title I?

Title I is a federal program that provides financial assistance to states, districts and schools with high percentages of students eligible for free and reduced lunch (FRL). Rhode Island receives about \$ 45 million per year and Providence receives approximately \$19 million per year to help ensure that all children meet challenging state academic standards. Providence elects to use its Title I funding to help support elementary, middle, and high schools.

District-wide, Providence has an average free and reduced lunch rate of about 85%. This poverty rate is so high that we are allowed to use Title I funds to run programs that serve all students, regardless of their family income. This type of program is called a **school wide program**. Every school in the district has a Title I school wide program.

Question 2: What does Providence do with its Title I money?

For FY13-14, Providence used Title I funding in five primary ways.

1. Approximately \$4 million that were previously set-aside for SES providers are used to support interventions focused on clearly defined school and district improvement strategies that are explicitly connected to the improvement plans for Priority, Focus, and Warning schools. Some of these funds have already been allocated to support large scale systemic reform initiatives.
2. We give approximately \$12 million per year directly to all elementary, middle, and high schools.
3. We spend approximately \$3 million on professional development for all of the teachers in the district, approximately \$1.1 million from Title I.
4. We spend approximately \$2 million on educational programs like math and literacy interventions, science kits and community partnerships.
5. We spend approximately \$2.7 million on central office staff and parent engagement specialists.

Question 3: If the district gives \$12 million directly to the schools, how much does my school get and what do we do with it?

The district uses a formula to determine how much Title I money to be given to each school; the formula multiplies a per pupil amount by the total enrollment of the school. The per pupil amount varies depending upon the percentage of students eligible for free and reduced lunch, and varies from \$500 to \$800 per FRL student. Schools use their Title I funds to pay for instructional coaches, student assistance counselors, after school programs, and miscellaneous programs and equipment

Question 4: What are my school's responsibilities for the use of Title I funds?

Not surprisingly, there are lots of strings attached to such large amounts of money. The district has a number of obligations and schools have some additional responsibilities. The main school responsibilities fall into these areas:

1. *Title I must **supplement** existing educational programs.*

Title I funds must be used to supplement, or add to, the educational resources provided by local funds. This means that Title I funds cannot be used to pay for any staff or materials that are required by law, including regular classroom teachers, textbooks, or building administrators. Title I can be used to buy class size reduction teachers, teacher aides, coaches, and supplementary educational materials.

2. *Schools must conduct a **comprehensive needs assessment**.*

Providence schools conduct a comprehensive needs assessment every year during School Improvement Planning (SIP) season and follow up with data review throughout the year. This process should include analysis of student achievement data such as NECAP, ACCESS, and other data. Because data analysis drives the SIP SMART goal development, this phase of SIP planning constitutes your comprehensive needs assessment.

3. *Schools must write plans for the use of Title I funds and those plans must be monitored annually.*

Every Providence school writes a school improvement plan called a SIP. These plans are also the **school wide program plans** required by the federal government. Because your SIP is also your school wide program plan, every time your school and SIT review your progress toward SIP goals, you are meeting your requirements to monitor your school wide program.

4. *Schools must establish a **school wide program committee**.*

Just as the SIP is your school wide plan, the school improvement team, or SIT, is your school wide program committee.

5. *Schools must provide high quality professional development.*

Providence School District has a massive professional development initiative that includes 20 to upwards of 80 hours of training per teacher based on content areas and instructional/programmatic needs. This PD initiative also serves as the school's Title I professional development plan.

6. *Schools must use research-based instructional programs and practices.*

The Providence School District only implements research-based curricular programs. For example, research emphasizes that class size reduction teachers and teacher aides improve student achievement. At all levels, when you reflect on purchasing and implementing additional programming and practice, consider only research-based practices.

7. *Schools must have parent engagement activities.*

Providence schools actively engage parents through a variety of activities including literacy and numeracy workshops, open houses, Parent Zones, parent groups, and many other family events. In addition, all schools complete family-school compacts use Parent-link to communicate with the parents in your school, and send home mailings in student backpacks. All of these activities are considered parent engagement activities under Title I.

Supplement vs. Supplant

Presumption of Supplanting:

Federal funds must be used to supplement, not supplant state and local funds. Supplanting is presumed to occur if federal funds are used to pay for something that is required in law or regulations; federal funds are used to pay for something that was previously paid for with state or local funds; or federal funds are used to pay for something for Title I students that the LEA provides to other students with state or local funds.

What does “Supplement, Not Supplant” mean?

In general, the term “**Supplement, Not Supplant**” means that federal funds must be used to *enhance* or *increase* the level of funding which is normally available from state or local sources; federal funds must **not replace** state and local funds.

- Title I, Part A funds must be used only to supplement the amount of funds that would, in the absence of Title I, Part A funds, be made available from state and local sources; Title I, Part A funds may not supplant (take the place of) non-federal funds.
- Any program activity required by state law or State Board of Education rule may not be funded with federal funds, regardless of whether any funding was provided in conjunction with the state mandate.
- Federal funds may not be used to fund positions, programs, or activities which were previously funded from state funds. For example, a position which was previously funded under one federal program may be funded under another federal program. However, a position may not be funded under a federal program when that position was previously funded from non-federal (state or local) funds. The only exception to this rule is if the position was previously funded from state or local funds to carry out state-funded activities and the position is no longer needed to carry out such activities. Then the position could be funded from federal funds to carry out activities associated with the respective federal program.
- Documentation must be maintained which clearly demonstrates the supplementary nature of federal funds.
- Fiscal and program records must show that activities conducted with federal funds were not previously funded from state or local sources.
- In order to demonstrate the supplementary nature of federally funded activities, grant recipients should maintain a written plan which clearly outlines what activities are state or locally funded versus which activities are federally funded, and provide a description of how these activities are supplementary.
- Supplemental state or local funds expended to meet the intent and purpose of Title I, Part A as described in 34 CFR may be excluded from this requirement.

Exception: A Title I, Part A **School wide campus** is not required to provide supplemental services to identified children. However, the campus may **ONLY** use federal funds to supplement the amount of funds that would in the absence of the federal funds be made available to the school from non-federal sources; state and local funds may not be diverted because Title I, Part A funds are available.

How can a school wide program campus demonstrate that it supplements, not supplants state and local funds for free public education?

The supplement, not supplant requirement as it applies to a campus operating a school wide program requires the campus to use Title I, Part A funds and other federal education program funds included in the school wide program only to supplement the total amount of **funds** that would, in the absence of the federal funds, be made available from non-federal sources for that campus, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency. Generally, it would be an LEA’s responsibility, not the campus’s, to ensure that a school wide program campus receives all the state and local funds it would have received had it not been a Title I, Part A school wide program campus. State and local funds may not be diverted because Title I, Part A funds are available. In other words, an LEA may not discriminate against a school wide program campus in the distribution of state and local funds and resources because it is receiving federal funds to operate a school wide program. Through its regular procedures for distributing funds and resources or other records, an LEA should be able to demonstrate that it has distributed state and local funds fairly and equitably to all its campuses—including school wide program campuses—without regard to whether those campuses are receiving federal education funds.

Considerations for Planning the Use of Federal Funds	
Ask yourself, is it.....	Guiding definitions:
Allowable? 	<ul style="list-style-type: none"> • Not prohibited or required by other state or local laws or regulations • Supplemental to the basic education program; reform strategies for improving the achievement of all children but particularly those who are considered to be traditionally underserved and/or most at risk of academic failure. • Necessary and reasonable for proper and efficient performance and implementation
Reasonable? 	<ul style="list-style-type: none"> • In nature and amount, does not exceed sensible limits • Generally recognized as ordinary and necessary (not exorbitant) • Market price for comparable goods/services • Approved cost basis • Follows district procurement policies and other guidelines
Necessary? 	<ul style="list-style-type: none"> • To meet a clear and documented need • To carry out an approved program/activity for the success of an approved/adopted initiative • To increase access, improve instructional program quality, and support all children, etc.
Advisable? 	<ul style="list-style-type: none"> • Manageable: is there sufficient time, personnel, funding to fully carry out appropriate infrastructure in place to support the activity • Aligned with current District initiatives, strategic direction, policies, etc.
If you can answer “yes” to all of the above, then your project should be fundable.	

The Do's and Don'ts of Title I Budgets

According to NCLB Public Law Section 1120A - FISCAL REQUIREMENTS. (b)(1) IN GENERAL. – A State educational agency or local educational agency shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from non-Federal sources for the education of pupils participating in programs assisted under this part, and not to supplant such funds.

Title I funds are to be used to **directly impact student achievement** as outlined in the accountability portion of the NCLB Law. “Directly impact student achievement” is the key phrase here. Some supplies might be approved for student use but, not approved for setting up an office or classroom. A good question to ask is, “How would the items be purchased in the absence of Title I funds?”

A simple three part test for determining Title I purchases:

1. Is there other funding available for the item? **No**
2. Is the District providing the item from general revenue anywhere else? **No**
3. Does the item directly impact achievement in the areas of reading, writing, math, or science? **Yes**

If your answers are as above, then Title I will usually approve the purchase.

The Do's of Title I Programs and Budgets

When you plan Title I activities, **do include in your budget...**

- Programs that have clear, empirically-proven links to improving student achievement;
- Out of school time activities, including staff, supplies, materials, and transportation;
- Parent engagement activities;
- Activities and school improvement strategies identified in your POPS or corrective action/restructuring plan.

When budgeting Title I funds, **do...**

- Specify your proposed activities and how they are *supplementary* and *connected to student achievement*;
- Be specific about what you are buying by identifying the types of items and if possible, their unit cost;
- Correctly classify each item on the budget pages ;
- Engage (or at least inform) your SIT in the process of budgeting your Title I funds;
- Attempt to accurately project (rather than ballpark) budgets to avoid returning your Title I money to the district;
- Be conservative when estimating staff time, which is traditionally the series returned unspent;
- Anticipate that there will be certain district initiatives that will be integrated into school level Title I budgets (student assistance counselors, class size reduction, etc); and
- Specify how supplies, materials, and equipment are supplementary in the justification.

The Don'ts of Title I Programs and Budgets

When you plan Title I activities, **do not...**

- Request Title I to pay for activities or materials that are *core operating expenses* to be used during the school day, such as copy machine toner, paper clips, white out, etc;
- Attempt to pay for activities or items that are not in your SIP or corrective action/restructuring plans;
- Break up your Title I budgets into tiny items and their unit cost (aka: 1 bottle of white out: .89).
- Budget office supplies in one large cluster (aka “Office supplies: \$5,000). Instead, cluster like items and include the cost basis whenever possible. For example, budget:
 1. Student supplies for after school program (pencils, notebooks, tissues): \$300.
 2. Paper for after school program: 20 boxes at \$20 per box.
- Plan to use Title I to pay for activities that you are required to do through state law or district policy; or
- Request that Title I pay for durable equipment that is not clearly and explicitly connected to a supplementary program, such as computers, printers, laminating machines, etc.

When you budget Title I, **do not...**

- Assume that you will be able to use your Title I funds for items or services not specifically identified in your budget;
- Cushion your budgets by intentionally overestimating the cost of proposed items;
- Use loosely calculated projections to create a budget, which results in over-spending/under-spending; or
- Attempt to purchase materials that appear to be core operating expenses, including replacement materials, textbooks, and equipment.

Use of Funds

Summary: Title I requires that the funds be used to enable teachers to become highly qualified, for professional development for schools and LEAs in improvement status, parental involvement for allocations at/above \$500,000, and nonpublic school services. Funds can also be used for other items in compliance with EDGAR and NCLB.

All uses of funds must be in conformity with the *Education Department General Accounting Rules (EDGAR)*, 34 CFR Parts 74-86, and the requirements of *No Child Left Behind Act of 2001, (NCLB), Sec 1120A: Maintenance of Effort, Comparability of Services, and Supplement/Not-Supplant provisions.*

Required Uses of Title I Part A (Basic Program) Funds

Professional Development, NCLB, Section 1116 — Ten percent of the Title I building allocation must be spent on professional development to address the academic achievement problems that caused the school to be identified for School Improvement (SI).

Professional Development for LEAs in District Improvement Status, NCLB, Section 1116(c)(7)(A)(iii) — Ten percent of the LEA's Title I allocation must be spent on professional development for LEAs identified by the Rhode Island Department of Education (RIDE) as being in District Improvement (DI) status. This may include funds already reserved for building-level professional development for schools in SI status.

Parental Involvement, NCLB Section 1118 — At least one percent of the LEA's Title I allocation (if over \$500,000) must be used for parental involvement; 95 percent of the one percent must be made available to the individual Title I buildings for their use.

Nonpublic School Services, NCLB, Section 1120 — The minimum amount of Title I-A funds an LEA must use for nonpublic school services is determined on an equitable basis based on the number of low-income nonpublic school students residing in the Title I-funded attendance area in the grade levels of the Title I-funded school multiplied by the corresponding Title I-served building's Per Pupil Amount (PPA).

Choice Related Transportation and Supplemental Education Services (SES) NCLB, Section 1116 — An LEA must set-aside an amount equal to 20% of the Title I Part A allocation to meet the requirements for NCLB Choice related transportation and for the provision of Supplemental Education Services in schools that have missed AYP for two or three consecutive year, respectively.

Building Allocations, NCLB, Section 1113 — An LEA must use Title I, Part A funds only in eligible school/attendance areas and according to the ranking order required by law.

Allowable Uses of Title I Part A (Basic Program) Funds

The purpose of Title I, Part A funds is to enable schools to provide opportunities for children served to acquire the knowledge and skills contained in the challenging state content standards and to meet the challenging state performance standards developed for all children. The law provides many flexibilities and opportunities for local educational agencies (LEAs) and schools to meet the purpose of Title I, Part A. In School wide Programs, Part A funds may be used for research-based activities that are part of the building's School wide components and listed in the LEA's State-approved consolidated resource plan (CRP). It is also recommended that funds be targeted to the Title I program goal, that all students will be proficient in reading and mathematics by SY 2013-14.

On the pages that follow is guidance on specific uses of Title I, Part A funds. This is not an exhaustive list of allowable Title I, Part A costs.

Using Title I Funds for Incentives

The PPSD Title I Office has seen a surge in the number of requests to use Title I funds for purchasing items to use as incentives with students. For the purpose of this guidance, Title I also includes programs under the Title I umbrella.

Due to the lofty goals in the *No Child Left Behind Act*, requirements for all students to reach proficiency by 2014 and an increased focus on attendance and graduation rates, schools are looking for ways to motivate students. Typically, schools are requesting to use incentives to increase attendance, increase assessment scores, and encourage positive behavior. In addition, sometimes incentives are used to gain support for increased parental involvement. The federal regulations are vague regarding allowability of using Title I funds for incentives. The federal guidance that has been issued on the topic basically indicates that it is allowable **if** the expenditures can pass the following three tests:

- **Reasonability Test:**
All expenditures using Title I funds must be reasonable. It helps to determine if the expenditure is reasonable by picturing yourself having to justify an expenditure to an auditor.
- **Nominal Test:**
Title I funds are meant to be used for staff and programs aimed at helping students achieve. A small portion of Title I funds can be used for other expenditures such as supplies, equipment, incentives, maintenance, etc., to support a Title I program. Expenditures for incentives should be **nominal rewards** that reflect a small portion of the total Title I funds available (For PPSD, no larger than 2% of your total discretionary budget allocation).
- **Educationally-Related Test:**
Student incentives purchased with Title I funds need to be educationally related, such as books or educational games. If certificates, such as movie passes, are distributed, it should be for meeting educational goals such as regularly attending school or finishing projects.

Examples of Allowable Incentives Using Title I Funds

- ▶ Providing a couple of randomly distributed nominal door prizes as an incentive for parents to attend a Title I meeting.
- ▶ Distributing movie passes as an incentive for increased attendance.
- ▶ Distributing gift certificates to a book store as an incentive to students who read a specific number of books or complete a project.
- ▶ Using a few incentives to support an academic goal.

Examples of Non-Allowable Incentives Using Title I Funds

- ▶ Providing all parents who attend a Title I parent meeting with a door prize.
- ▶ Giving away bikes, MP3 players, or other **high priced** items as an incentive for increased attendance.
- ▶ Giving cash to students who read a specific number of books or complete a project. It is never allowable to distribute cash to students or parents using Title I funds.
- ▶ Using multiple incentives for many different activities.

The U.S Department of Education staff has urged state agency personnel to carefully monitor and approve Title I expenditures for incentives. School personnel need to ensure that all requests for incentives pass the three tests indicated to refrain from having an audit concern and being required to repay funds for inappropriate expenditures. School personnel need to outline requests for incentives in the annual Title I budget detail sheets and keep thorough documentation for auditing purposes.

Using Title I Funds for Refreshments

As a means of encouraging parents of Title I students to participate in school activities, *reasonable* expenditures for food and refreshments for parent meetings or trainings, particularly when such sessions extend through mealtime, are allowable.

Using Title I Funds for Ceremonies

Per OMB circular A-87, costs of meetings and conferences where the **primary purpose is the dissemination of technical information**, including meals, transportation, rental of meeting facilities, and other incidental costs are allowable. However, costs of amusements, social activities and incidental costs relating thereto such as meals, beverages, lodgings, rentals, transportation and gratuities are unallowable. Use the same 3-part test referenced above to determine the appropriateness of the request and avoid any audit concerns. Title I funds cannot be used to provide meals for athletic banquets.

Using Title I Funds for Travel to Conferences

The costs for staff travel and conferences are allowable if the travel and conferences are specifically related to the Title I, Part A program and not to the general needs of the local educational agency (LEA) or school and are reasonable and necessary.

Using Title I Funds for Professional Development

The *No Child Left Behind* (NCLB) Act, Section 9101, defines professional development; as including activities that

- Improve and increase teachers' knowledge of the academic subjects they teach,
- Are high quality, sustained, intensive and classroom focused, and
- Positively impact classroom instruction and teacher performance.

High Quality Professional Development

DOES:

- Involve multiple sessions over time, moving beyond one-day or short-term conferences.
- Align to school initiatives and standards.
- Address job-related skills aimed at impacting student performance.
- Include job-embedded learning opportunities such as collaborative teams, study groups, data analysis, and other sustained learning opportunities.
- Originate from various sources: school, district, university, professional organizations, online courses, independent study, etc.

DOES NOT:

- Involve only one-day conferences.
- Include a mix of different professional development activities individualized for each staff member.

Using Title I Funds for Technology

Any equipment purchased with Title I, Part A funds must be reasonable and necessary to implement a properly designed program for Title I, Part A participants.

The use of Title I funds to purchase equipment is allowable if it is determined that:

- there are no supplanting issues;
- the equipment is reasonable and necessary to effectively operate the school's Title I, Part A programs;
- existing equipment will not be sufficient; and
- the costs are reasonable.

Under some circumstances, equipment purchased as part of a properly designed Title I program might be used on a less than full-time basis. If that equipment could be made available for other educational uses without interfering with its use in the Title I program or significantly shortening its useful life, use of equipment in non-Title I activities may be considered proper if that use does not exceed 10 percent of the time the equipment is used in Title I, Part A activities.

To protect the integrity of the equipment as a Title I expenditure, the school must ensure and document that:

- the Title I, Part A equipment is part of a Title I, Part A program that has been properly designed to meet Title I, Part A participants needs;
- that the equipment purchased with Title I, Part A funds is reasonable and necessary to operate the school's programs, without regard to any use in non-Title I, Part A activities;
- that the program has been designed to make maximum appropriate use of the equipment for Title I, Part A purposes; and
- that the use of the equipment in non-Title I activities does not decrease the quality or effectiveness of the Title I, Part A services provided to participating students with the equipment, does not increase the cost of using the equipment for providing those services, nor result in the exclusion of Title I, Part A students who otherwise would have been able to use the equipment.

The following examples illustrate some situations in which Title I, Part A equipment may be used in non-Title I, Part A activities:

1. *Computers purchased with Title I, Part A funds are used full-time during the school day but are idle during evening hours and would be beneficial to adult education classes that meet twice a week. The use in the adult education classes would not be extensive and, therefore, would not significantly shorten the useful life of the equipment. Under these circumstances, the Title I, Part A computers may be used for the adult education classes.*
2. *Title I, Part A computers that are part of a properly designed Title I, Part A program are being used full-time except for one period each school day. The proper amount of computer equipment was purchased for the Title I, Part A program and the Title I, Part A program cannot be redesigned effectively to use the computers in every period. Under these circumstances, the Title I, Part A computers may be used, for example, for State or locally funded supplemental education activities during the period they are idle.*
3. *Ten listening centers were purchased with Title I, Part A funds and are used regularly but not continuously in the Title I, Part A program. The Title I, Part A program cannot be designed effectively to use the centers more frequently. The listening centers are used in an extracurricular foreign language program for periods of time averaging 10 percent of the time devoted to Title I, Part A. If the useful life of the centers is not significantly reduced, the centers may be used in this manner.*

Sources of Information

[NCLB, Title I, Sections 1114, 1113, 1116, and 1118](#)

[October 2008, Title I Regulations, Sec. 200.77 and 200.78](#)

[US ED Non Regulatory Guidance - Fiscal Issues, February 2008](#)

[US Ed Non-Regulatory Guidance – Public School Choice, January 2009](#)

[US ED Non Regulatory Guidance – School Attendance Areas and Allocation of Title I Funds, August 2003](#)

[US ED Non Regulatory Guidance-School Improvement Plans, July 2006](#)

[US ED Non-Regulatory Guidance-Schoolwide Programs, March 2006](#)

[US ED Non-Regulatory Guidance – Supplemental Educational Services, January 2009](#)