

Title I-Part A - Uses of Funds

Issue Date: May 10, 2004

Revised: November 30, 2005; November 16, 2007

Sources: NCLB, Sections listed below; EDGAR, 34 CFR Parts 74-86

Key Words: Title I, Uses 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 for Highly Qualified Teachers as defined in NCLB, Section 9101(23) — Five to 10 percent of the local educational agency's (LEA's) Title I allocation, starting in SY 2002-03, and not less than five percent thereafter, must be spent to help non-highly qualified teachers become highly qualified by the end of SY 2005-06, and nonqualified instructional paraprofessionals in Title I supported programs become qualified by January 8, 2006, unless a lesser amount is needed.

Professional Development for Schools in School Improvement Status, 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 Ohio Department of Education (ODE) as being in District Improvement (DI) status, starting in SY 2005-06. This may include funds already reserved for building-level professional development for schools in SI status but may not include funds reserved for professional development to achieve highly qualified teachers as defined in NCLB, Section 9101(23).

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 a school building must use for nonpublic school services is 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). If the district also does a set aside on the Title I Set-Aside page for salary differential, professional development, parental involvement, or other, the district must calculate the corresponding per-child amount of that set aside for nonpublic school service. Classroom teachers, hired by the nonpublic school, who instruct Title I-served students in their regular classrooms should be the beneficiaries of the district's nonpublic set aside for Professional Development for Highly Qualified Teachers.

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 Schoolwide Uses of Funds

The law is flexible and provides many opportunities for LEAs and schools to meet the purpose of Title I-Part A. In Schoolwide Programs, Part A funds may be used for research-based activities that are part of the building's Schoolwide components and listed in the LEA's approved online CCIP Title I budget. It is also recommended that funds be targeted to the Title I program goal, all students will be proficient in reading and mathematics by SY 2013-14.

The limits listed under Allowable Targeted Uses of Funds for administration, supplies and equipment also apply to the Schoolwide Budget in the CCIP.

Allowable Targeted Uses of Funds

In Targeted Assistance schools, Part A funds can be used to meet the needs of only Title I-served children and must be listed in the LEA's CCIP Planning Tool and approved Title I budget.

Some allowable targeted costs are included below. This is not an exhaustive list. See the *Education Department General Administrative Regulations (EDGAR), 34 CFR Parts 74-86*, for the complete list.

- **Employee salaries and benefits** — Are fundable for the time devoted and identified specifically to the performance of the Part A program, if granted under approved CCIPs and the costs are always distributed equitably to the Part A grant and to other activities. Districts must maintain appropriate time distribution records for any employee who works on Part A duties but also has other duties. District may use the Single Funding Source Certification if employees are paid 100 percent from one federal fund. Form is in the CCIP Doc Library, under Financial Information, Guidance-Financial. The recommended limit for administrative salaries/benefits, and other administrative expenses is five percent of the district's Title I allocation.

- **Professional development** — Is fundable if specifically related to the Part A program, designed to meet the specific educational needs of Part A participants, and supplements rather than supplants, state and local training. Teachers whose professional development is paid by Title I, Targeted Assistance, must have Title I-served participants in their classroom. See also *Required Uses of Fund* (above) for professional development.
- **Supplies and educational materials** — Are fundable if reasonable, necessary, and consumed specifically for the purpose of the Title I-Part A program. The recommended limit on supplies and equipment (combined) is 10 percent of the Title I LEA allocation. Otherwise, the LEA must document the details of the supplies and the reason for exceeding the recommended limit and must request ODE approval.
- **Equipment** — Is fundable if 1) the equipment is necessary to effectively operate Title I-Part A programs, 2) existing equipment will not be sufficient, and 3) the costs of the equipment are reasonable. The recommended limit on supplies and equipment (combined) is 10 percent of the Title I LEA allocation. Otherwise, the LEA must document the details of the equipment and the reason for exceeding the recommended limit and must request ODE approval.
- **Travel and conference costs** — Are fundable if specifically related to the Title I-Part A program and not to the general needs of the LEA or school, and are reasonable, necessary, and are in keeping with the LEA's policies on travel and conference costs.
- **Maintenance/operation costs** — Are fundable if reasonable, necessary for the success of the Title I-Part A program, and distributed on an equitable basis (such as janitorial and utility costs) to the extent that costs are not otherwise included in rent or other charges for space.
- **Rental/lease of buildings** — Are fundable if the costs are reasonable, the space is necessary for the operation of the program, and space in publicly owned buildings is not available.
- **Interest on lease purchase agreements** — Are fundable if in accordance with cost principles of OMB Circular A-87.
- **Refreshments for parent meetings/trainings** — Are fundable if reasonable, particularly when such sessions extend through mealtime, and are in keeping with the LEA's policies on refreshments for parent meeting/trainings.
- **Indirect costs** — Are fundable if approved and on file with the ODE Office of Grants Management, and costs included are in compliance with EDGAR.

Allowable Use of Title I for School Improvement PSC and SES

School Improvement (Sec. 1116) costs may be paid from the CCIP Title I budgets up to the levels indicated below. If the LEA chooses to pay these costs out of local funds rather than Title I, it should document that in the CCIP Log.

- An amount equal to five percent of the district's Title I allocation for Public School Choice (PSC) transportation.



- An amount equal to five percent of the district's Title I allocation for Supplemental Educational Services (SES).¹ The district Per Child amount expended for these services must be the lesser of the two: 1) Amount calculated by ODE and inserted into the CCIP-Consolidated Application in the Title I Set-Asides section, or; 2) Actual costs of Supplemental Educational Services received by the student.
- An amount equal to the remaining 10 percent of the LEA Title I allocation for PSC transportation, Supplemental Educational Services, or both.
- Total amount the LEA spends must be equal to 20 percent of LEA's Title I allocation, unless a lesser amount is required.

¹ The LEA Per Child amount for SES is not the same as the Per Pupil Amount (PPA) used for Title I building allocations. The LEA Per Child amount for SES is based on formula child counts, while the Per Pupil Amount for building allocations is based on free and reduced price meal applications. (For Community schools, the PPA may be similar to the LEA Per Child amount, since both are based on free and reduced price meal applications.) The LEA Per Child Amount is listed in the CCIP Consolidated Application, on the School Allocation Worksheet page, following the SES set-aside line.