TITLE I, PART A:
IMPROVING BASIC PROGRAMS OPERATED BY LOCAL EDUCATIONAL AGENCIES
Guidance on Allowable and Unallowable Expenditures

LEAs should take the following steps to determine if a proposed program or activity is allowable under Title I, Part A:

1. Verify that proposed Title I, Part A activities are **reasonable and necessary** considering the amount of money being spent and the needs of the program. (2 CFR 200.403(a))

    - Reasonable: consistent with prudent business practice and comparable current market value.
    - Necessary: required to carry out the intent and purpose of the Title I, Part A program.

2. Ensure that the identified needs are listed in the Title I, Part A section of the Consolidated Application, and that the proposed program or activity addresses the identified needs.
    - For nonpublic schools, confirm that the LEA Affirmation of Private School Consultation Form indicates the need for the proposed Title I, Part A activities.
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3. Ensure that the activity is not one of the prohibited activities in ESEA Section 8526, as amended by the ESSA.

Required Title I Reserves

Homeless Reserve

All LEAs that receive Title I, Part A funds must reserve funds for services for homeless students. LEAs should conduct a needs assessment to determine the reserve amount and clearly show this reserve in the Title I budget and budget narrative.

Parent and Family Engagement Reserve (Formerly Parent Involvement)

LEAs with Title I, Part A allocations greater than $500,000 must reserve an amount equal to 1% of the Title I, Part A allocation and allocate 90% of those funds to Title I schools for Parent and Family Engagement activities. These funds must be clearly identified in the Title I budget.

Additional Reserve Requirements

Additional reserves are required for LEAs with Neglected and Delinquent facilities and students attending private schools. Please see the Consolidated Application for ESSA-Funded Programs web page for more information.

Allowable Expenditures	Unallowable Expenditures
Supports for Title I Students: • AIS, RTI, and credit recovery services • Certified teachers and teaching assistants • Proportional benefits for Title I salaries • Counseling, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students' skills outside the academic subject areas • Equitable services for private school students • Pre-K, summer, and extended day programs • Transportation for Title I programs if not otherwise available **Support Staff for Title I Programs:** • Teacher aides (non-instructional services) • Data management staff for Title I only • Secretary and/or clerks for Title I only • Title I coordinators and administrators • Stipends for principals outside of contract hours • Nurses for summer and Title I programs **Title I Program Supplies and Materials:** • Instructional materials for Title I programs • Computer aided instructional software for Title I programs • Diagnostic and progress monitoring materials for Title I programs • Title I data management software • Nutritious snacks for Title I students • Technology to upgrade the educational program of a SWP	**General Expenditures** • Base pay for principals (contract hours) • Superintendents and deputies with districtwide responsibilities • Direct reimbursements to private schools **Targeted Assistance Programs** • Costs/services that are not targeted to at-risk students • Special Education services (OT, PT, Speech) • Part 154 services for English Learners **Supplies and Materials:** • Food and refreshments for staff activities, including working lunches • Furniture and office equipment is generally not allowable unless it is necessary for a Title I room/program • Incentives to reward students for participation in a Title I program, such as monetary awards or rewards with monetary value such as passes to amusement parks or gift certificates • Any costs related to entertainment, amusement, or diversion • Title I supplies or materials to private schools without Title I funded services • Core instructional materials to private schools **Other:** • Field trips for entertainment or recreational purposes only • Construction, Remodeling, or Renovation projects are not allowable

Title I Parent and Family Engagement:

- Parent liaison or coordinator
- Family engagement consultants
- Stipends for staff to plan for or participate in Title I activities outside contract hours
- Costs for activities including materials, transportation, childcare, and light refreshments

Professional Development aligned with Title I:

- Stipends and/or substitutes for staff
- PD aligned to a Schoolwide Program plan or directly related to the needs of participating Title I students
- Educational consultants
- Reasonable supplies and materials for PD
- Travel costs are allowable if they relate to the grant program activities. NOTE: The district should have a travel cost policy that is applied consistently across federal and nonfederal programs. The policy should cover mileage, air fare, lodging, meals and/or per diem rates. Hotel rates for conferences or trainings must be reasonable.

Other:

- Field trips aligned with academic content or to access humanities experiences
- Preparation for and awareness of opportunities for postsecondary education and the workforce. This may include career and technical education programs and broadening secondary school students' access to coursework to earn postsecondary credit while still in high school (such as Advanced Placement, International Baccalaureate, dual or concurrent enrollment, or early college high schools)
- Student awards for effort and achievement (not participation), which are nominal and non-monetary

Use of Funds in Targeted Assistance and Schoolwide Plan Schools

Targeted Assistance Schools

In Targeted Assistance schools, Title I, Part A funds may only be used to meet the needs of children identified as being in the greatest need of services. Students must be selected using multiple, educationally related, objective criteria.

Schoolwide Programs

In Schoolwide programs (SWP), Title I, Part A funds are used to upgrade the entire educational program in a school, and all students in the school may benefit from the use of Title I, Part A funds. Activities must be part of the schoolwide plan and support an identified academic need through the school's comprehensive needs assessment. In addition to supplemental services, SWPs may provide elective courses to prepare or support low-achieving students to take advanced courses, preschool enrichment programs, and programs to improve outcomes for students with disabilities and English learners. For more information see the Federal guidance regarding use of funds in a Schoolwide Program.

The chart below highlights common ways Title I, Part A spending has been used in a more limited way, as compared to what is allowed under ESSA. Understanding and addressing these limitations is important so that LEAs can ensure that Title I, Part A funds are used to their full potential.

Misunderstanding	Explanation of Law
Title I funds may be used only to support reading and mathematics instruction.	Title I funds may be used in a schoolwide program to support all academic areas that the school's needs assessment identifies as needing improvement.
Title I funds may be used only to provide remedial instruction.	The purpose of a schoolwide program is to upgrade the entire educational program in the school, in order to raise the achievement of the lowest-achieving students. This can be achieved through remedial instruction. However, this may also be achieved by preparing low-achieving students to take advanced courses. For example, Title I funds can be used to provide an intensive summer school course designed to accelerate the lowest achieving students'

	knowledge and skills, by offering an elective course to prepare them to take advanced courses or providing them with after-school tutoring while they are taking advanced courses.
Title I funds may be used only to serve low-achieving students.	Title I funds may be used to upgrade the entire educational program in a schoolwide program school and, in doing so, all students may benefit from the use of Title I funds. However, consistent with the purpose of Title I, the reason to upgrade the entire educational program in a school is to improve the achievement of the lowest-achieving students.
If a school does not consolidate funds through a schoolwide program, Title I funds may be used only to provide services in a pull-out setting.	Regardless of whether funds are consolidated, a schoolwide program school need not use Title I funds to provide services only in a pull-out setting, although this practice is not prohibited. Title I funds may be used to upgrade the entire educational program in a schoolwide program school and serve all students, even if the school does not consolidate Title I funds with its other funds. However, the primary purpose of a schoolwide program is to raise the achievement of the lowest-achieving students by upgrading the entire educational program, which can best be achieved by consolidating funds.
Title I funds may be used only for instruction.	Title I funds may be used for activities and strategies designed to raise the achievement of low-achieving students identified by a schoolwide program school's comprehensive needs assessment and articulated in the school's comprehensive schoolwide plan. For example, Title I funds may be used to improve the quality of instructional materials, improve attendance, improve school climate, counteract and prevent

	bullying, provide counseling, mentoring, and school-based mental health programs, or provide positive behavioral interventions and supports.
Title I funds may not be used to support preschool-aged children.	A schoolwide program school may use Title I funds to operate, in whole or in part, a preschool program to improve cognitive, health, and social-emotional outcomes for children from birth to the age at which the LEA provides a free public elementary education. Such programs are designed to prepare children for success in kindergarten. All preschool-aged children who reside in the school's attendance area are eligible to participate.
Individuals with Disabilities Education Act (IDEA) Part B funds may not be consolidated in a schoolwide program.	A schoolwide program school may consolidate funds received under Part B of the IDEA. A school that consolidates funds under Part B may use those funds in its schoolwide program for any activities under its comprehensive schoolwide plan but must comply with all other requirements of Part B of the IDEA.

For additional assistance, contact the Office of ESSA-Funded Programs at (518) 473-0295.