# 2025-2026 TITLE IIIA
# EXPENDITURE GUIDELINES: NON-PUBLICS

**A guide to spending Title IIIA funds for sites enrolling English Learners:**
Title IIIA cannot be used for the core program that is mandated by the state of Wisconsin or to supplant costs for which the district is funding with local funds.

**Required uses of Title IIIA funds are:**

- To develop high-quality language instruction educational programs for ELs.
- To provide professional development designed to develop and enhance the capacity to provide high-quality language instruction educational programs for ELs.
- To promote parental and community participation in language instruction educational programs for ELs.

The Milwaukee Public Schools follows expenditure guidelines for the Title IIIA formula subgrant as set forth in the **Non-Regulatory Guidance: English Learners and Title IIIA of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act.** For a cost to be reimbursed, the district adheres to a standard that all expenditures charged to federal grants must be:

Reasonable: A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

Allocable: A cost is allocable to a cost objective if the goods or services involved are chargeable or assignable to the cost objective in accordance with the relative benefits received.

Allowable: A cost is allowable if it is necessary and reasonable for proper and efficient performance of the award and allocable to the award.

See the Title VIII, Part F of the Elementary and Secondary Education Act Equitable Services Non-Regulatory Guidance 2023 for additional information.

The following pages provide a partial listing of expenditure purposes for which schools have requested guidance in the past under Title IIIA guidelines.

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| Expenditure Type | Allowable | Allowable with Conditions | Not Allowable |
|---|---|---|---|
| Advertising – brochures informing parents of school achievement, rules, regulations, etc. are allowable. Example: The school is hosting a parent night for ELs and families. Title IIIA could be used to compensate teachers to stay beyond their contractual hours to create the brochure and/or Title IIIA could be used for duplicating expenses. **Billboards or other large-scale strategies to promote enrollment opportunities are not allowable.** | | X | |
| Childcare for parents while attending parental involvement activities under Title IIIA. Childcare for required school wide events (e.g., parent teacher conferences, open house) **is not allowable**. | X | | |
| Conferences (workshops, seminars) – Must follow LEA guidelines for professional leave/absence and travel. For local and out-of-town conferences (not including webinars) Title IIIA may be allowable for registration and lodging. The remaining costs which include travel and per diem cannot be covered under Title IIIA. | | X | |
| Coursework – may be allowable for an individual teacher of Title IIIA students if the coursework meets the following criteria:<br>● is directly related to ESL endorsement and/or bilingual endorsement<br>● is related to instructional strategies to meet the needs of ELs<br>● aligns with the professional development needs identified in the needs assessment process (minimum of 3 sequential sessions).<br><br>Title IIIA funds may **not** be used to pay for any technology items needed for a course. **It may not be used to cover licensing fees with state agencies.** | | X | |
| Decorations, flowers, bereavement, graduation activities and supplies | | | X |
| Family literacy – activities to **promote English language acquisition** and include strategies such as student/parent reading nights, parenting skills, or other materials and classes for parent development. | | X | |
| Field trips – educational in nature only and the appropriate grade level academic and language standards are included in the Needs Assessment. **For ELs only. Must not be used to cover the cost of a trip for ELs when other students are going on the same field trip.** | | X | |
| Food – for parent participation, such as light snacks (e.g., cookies and punch). Only if the training or activity is at least two hours in length and runs over a normal mealtime. The anticipated amount for a snack must not exceed $3.00 per family attendee. **Food is not allowed for staff activities or trainings.** | | X | |
| Furniture, appliances, copy machine leases, postage meters, building repairs, theater systems, flat screen TVs | | | X |

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|---|---|---|---|
| Instructional resources – must be supplemental to what the private school would be required to provide in the absence of the Title III services. Must be clearly labeled and identified as the LEA's property, and must be secular, neutral, and non-ideological. Examples include:<br>● textbooks and workbooks that were not included in the school's adopted textbook process<br>● leveled readers to support all content areas within reasonable guidelines<br>● graphics and visuals to aid in subject material teaching/learning<br>● professional texts related to language acquisition theory and instruction of ELs<br>● resources in other languages with justification in the Needs Assessment<br>● headsets for online listening and speaking programs (not allowable for testing)<br>Instructional materials for K4 students can be acquired through Title III, however, Title III funds are generated beginning in K5. | | X | |
| Intervention – Instructional materials to support ELs during intervention time are not allowable. | | | X |
| Licenses for software or curriculum used by the school that **are not** part of the school's acquired resources or core programming (must be in name of the service provider) | | X | |
| Mailings – only if supplementary in nature; must not be utilized to conduct mailings for the core educational program | | X | |
| Professional development – can be conducted at school sites, however, must be contracted by the service provider. Title IIIA may be allowable for compensation and/or training materials for professional development that occurs at a school site. Must meet the following criteria:<br>● Designed to improve instruction and assessment of ELs<br>● Designed to enhance the ability to understand and implement curricula, assessment practices and measures, and instructional strategies for ELs<br>● Effective in increasing children's English language proficiency or substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills of such teachers<br>● Of sufficient intensity and duration which shall not include activities such as one-day or short-term workshops and conferences. | | X | |
| Raffles, door prizes, gift cards/certificates, fundraisers, student, staff, or parent incentives | | | X |
| School supplies – tape, notebooks, pencils, paper, whiteboards, whiteboard markers, ink, bins/baskets, replacement and special program textbooks and teacher guides | | | X |
| Storage – locked file cabinets may be allowable only if used to house materials purchased using Title IIIA funds. | | X | |
| Technology – technology (e.g., Smartboards/touch panels, iPads, document cameras, printers, Chromebooks, and laptops) **is not** an allowable use of Title IIIA funds. | | | X |

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|---|---|---|---|
| Technology – If a student needs access to translation material on a device or a family uses a supplemental device (e.g., Chromebook, iPad, and laptop) to access first language support materials from home that they would not otherwise be able to access this would be an allowable use of Title IIIA. | | X | |
| Translation & interpretation services for parents of ELs for Title IIIA sponsored events | X | | |
| Transportation – for ELs from after-school programming that includes an academic component and for parents of ELs for Title IIIA sponsored events | X | | |
| Tutoring - Any afterschool services/extended services for ELs using Title IIIA allocations need to be offered by a certified teacher. | X | | |
| T-shirts, uniforms, book bags, baseball caps, athletic gear, water bottles, letter sweaters or other 'school spirit' apparel or marketing items with school logos | | | X |
| WIDA certifications – compensation for WIDA certification processes for ACCESS for ELs assessment and WIDA Screener are allowable. While certification is allowable, **it is not allowable to compensate staff for the actual administration of ACCESS/Screener.** | X | | |