

Title I Guidance

Federal law directs that Title I funds are for the following purposes: 1) to increase the achievement of low-income students to proficient and above; 2) to enhance the educational efficacy of the entire school through Title I Schoolwide Program; 3) to enhance teacher effectiveness through Professional Development (PD); and, 4) to build parent capacity that are considered critical to this primary intent through Parent Engagement.

To determine if expenditures are appropriate for Title I, ask the following questions:

- Is this expenditure directly related to the high-need, core student **academic achievement** areas as identified and specifically described in the School Plan for Student Achievement (SPSA)?
- If the expenditure is for PD: is it aligned to student needs for academic achievement as described in the SPSA?
- If the expenditure is for parent engagement: does this expenditure increase the understanding of parents in how to support their children in being academically successful in school, and is it specifically described in the SPSA?
- For **all** Title I expenditures: is the expenditure reasonable and necessary?
- For questionable expenditures: is there a better/more appropriate Resource code to use?

If you are unsure if a proposed expenditure meets guidelines, please call State and Federal (S&F) Programs at (760) 883-2703, extension 480-5019.

LCFF Guidance for Supplemental and Concentration Grant (S&C) Funds

California Education Code states that services funded by the Local Control Funding Formula (LCFF) targeted funds must be **principally directed towards, and effective in**, meeting the district's goals for the following student groups: low-income, English learner, and/or foster youth (also referred to as "unduplicated"). Schools with greater than 40% of unduplicated pupils may utilize the funds for schoolwide services; however, those with less than 40% of these pupils may not include schoolwide use of the funds without citing research, experience, or theory as justification.

Supplemental and concentration funds allocated to school sites are unrestricted; however, they are to be committed with a purpose: to increase or improve services to our district's neediest students greater than what is provided to all students. Because LCFF services and expenditures are monitored for inclusion in the Local Control and Accountability Plan (LCAP) Annual Update, sites should ensure SPSA alignment to the LCAP goals, and to the intent of the LCFF.

For additional information about LCFF and the integration of the SPSA into the district's LCAP, please call S&F Programs at (760) 883-2703, extension 480-5019.

| Expenditure Type: Items/Description | Title I | Title I – Allowable with Conditions | LCFF/ LCAP | LCFF/ LCAP – Allowable with Conditions |
|---|---------|-------------------------------------|------------|--|
| Advertising: brochures informing parents of school achievement are allowable | | X | X | |
| Advanced Placement courses: professional learning/materials | | | X | |
| AP Exam Fees for low-income students | | not allowable under Title I | X | |
| Alcoholic beverages | | | | |
| Appliances: stoves, refrigerators, microwaves, etc. | | | | |
| Art supplies or consumable materials | | | X | |
| Attendance Recovery Programs: Timecards and expenses related to Saturday School or similar attendance recovery programming. | | not allowable under Title I | | |
| Athletic Fees or Uniforms: supplied to low-income, homeless or foster youth | | | | X |
| Banquets, award programs, luncheons, brunches, parties, picnics | | | | |
| Bereavement or congratulatory cards, flowers or gifts | | | | |
| Books: supplemental texts | | X | X | |
| Building supplies, repairs or modifications to the school | | | | X |
| Carnivals/fairs: decorations, expenses, or prizes | | | | |
| Childcare for parents while attending school-sponsored events related to Title I focus areas (academic improvement for the lowest performing students) | X | | X | |
| Communications expenses (specify: printing, postage, etc.) | X | Title I program purposes only | X | |
| Conferences: specify topic – not Special Education Note: Title I funded conference attendees must only attend sessions allowable under Title I. Consult with S&F Programs for details. | | X Consult with S&F Programs | X | |
| Computers: classroom student only for supplemental programs | | X | X | |
| Contracts for outside services: specify provider and purpose | X | Academic Intervention/PD | X | |
| Copiers, postage meters, other office equipment | | | | |
| Decorations | | | | |
| Employee incentives or recognition gifts | | | | |
| Facilities Improvements: including but not limited to painting, remodeling, permanent signage, scoreboards. | | | | |
| Family Literacy: activities to promote family literacy are allowable and include strategies such as student/parent reading nights, support for lending library, workshops on parenting skills or other materials for parent education | X | | X | |
| Field Trips (Academic): admission fees or district transportation provided as financial support to low income, homeless or foster youth | | | X | |
| Firebirds Hockey tickets and/or tickets for professional sporting events | | | | |
| Flat screen TV or home theater systems | | | | |
| Food for parent meetings or workshops | | | | X light refreshments only |
| Food for staff or students (lunches/meals) | | | | |
| Food/Beverages for parents, students, and staff during “working” lunches/meals. | | | | X provide agenda |
| Fundraisers: food, door prizes, equipment, or other fundraiser support | | | | |

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|--|---------|-------------------------------------|------------|---|
| Furniture: if reasonable and necessary to supplemental activity such as a Parent Resource Center | | | | X Consult with S&F Programs |
| GATE Professional Learning: substitutes, or extended day, materials | | | X | |
| Gift certificates/gift cards | | | | |
| Graduation supplies or activities such as financial support to low income, homeless, or foster youth | | | | X |
| Homeless student supplies (including emergency clothing) | X | | X | |
| International Baccalaureate: registration, exam fees | | not allowable under Title I | X | |
| Instructional materials: additional or supplemental textbooks and workbooks, not adopted textbooks | X | ELD, CCSS, Early Literacy | X | |
| Licenses for software or curriculum used by school (allowability determined by software end users and purpose) | X | For supplemental programs | X | |
| Library Books | X | To supplement literacy program | X | |
| Lodging for conferences: follow district protocol | X | within Title I focus areas | X | |
| Mailings: informational to parents, includes newsletters, testing information | | | X | |
| Non-classroom furniture (see Furniture) | | | | |
| Parent meeting supplies and materials | X | Title I Parent Engagement | X | |
| Parent recognition luncheon or other recognition events | | | | |
| Positive Behavior Interventions and Supports (PBIS) materials | | | X | Expenditures must be reasonable and necessary |
| Parent-Student dinners / Parent-Staff dinners | | | | |
| Parent training or educational services: Workshops or other training around school's high-need areas such as tutoring skills for math and/or English, attendance, monitoring student performance through on-line gradebook, understanding student planners, child advocacy, etc. | X | | X | |
| Physical Education (PE) equipment to meet state standards | | | X | |
| Printers, printer ink cartridges, toner cartridges | | | | X For instructional use only |
| Professional Learning fees (Title I) May include coursework registration fees for an individual teacher if the coursework meets the following criteria: 1) the course taken is directly related to the teacher's assignment; 2) the coursework is related to instructional strategies to meet the needs of struggling students; and 3) in a school-wide school, the course aligns with professional learning needs identified in the needs assessment process. College credit accrual costs are not allowable under any resource. | | X Consult with S&F Programs | | X Consult with S&F Programs |
| Raffles/door prizes | | | | |

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|--|---------|---|------------|--|
| School supplies provided to low-income, homeless, or foster youth | X | Supplemental to core program to enhance instruction | X | |
| Software Licenses: Check with district’s Instructional Technology Coordinator (allowability determined by software end users and purpose) | X | For supplemental programs | X | |
| Student Incentives: Small items of minimal cost supporting PBIS rewards systems. Including but not limited to bookmarks, pencils, erasers, fidget items, stickers. | | | X | |
| Student Incentives: School “swag” items and/or school spirit apparel with school or district logos Allowable examples (low cost): plastic water bottles, frisbees, plastic sunglasses Non-allowable examples (moderate to high cost): hats, t-shirts, book bags, letter sweaters | | | | X Contact S&F Programs for prior approval |
| Subscriptions: e.g., Scholastic News, Time for Kids, print or digital educational periodicals, or digital platforms like NewsELA | X | | X | |
| Technology: Hardware supporting academic instruction or intervention (NOTE: Printers are not an approved purchase using Title I funds) | X | Supplemental | X | |
| Theater or speaker systems | | | | X Portable PA only |
| Theme park admissions: Disneyland, Six Flags, Knott’s, Sea World, water parks, and/or other similar amusement/water park admissions | | | | Contact S&F Programs for prior approval re: academic programs at these locations |
| Travel: School employees or parents only. Follow district guidelines. Only costs directly associated with the permissible travel will be reimbursed. No costs for tours or souvenirs offered by the event will be reimbursed. | X | | X | |
| T-shirts with/without school or district logos for targeted students affiliated with various school-related student groups | | | | X Contact S&F Office with questions and prior approval |
| Transportation for parents | X | For Parent Education events | X | |
| Uniforms: School uniforms or staff uniforms | | | | |
| Water Coolers / Water Systems | | | | |

| Expenditure Type: Personnel | Title I | Title I - Allowable with Conditions | LCFF | LCFF – Allowable with Conditions |
|---|---------|-------------------------------------|------|----------------------------------|
| Academic Counselor: Role must be defined in SPSA description and may not supplant district provided counselors or COSAs | | Not allowable under Title I | X | Targeted outreach to LI, EL, FY |
| Administrators: Principal, Assistant Principal | | | X | |
| Bilingual Instructional Assistant (Paraprofessional) | X | | X | |
| Campus Supervision: campus monitors, security, yard duty | | | | X |
| Child Care: Extra duty for classified staff | X | Parent Engagement meetings | X | |

| Expenditure Type: Personnel | Title I | Title I - Allowable with Conditions | LCFF | LCFF – Allowable with Conditions |
|---|---------|---|------|----------------------------------|
| Classroom teachers: basic instruction | | | | |
| Custodian: parent/family engagement events for academic improvement (not school fairs, festivals, etc.) | | | | X |
| Instructional Assistant/Paraprofessional: Intervention, EL support | X | | X | |
| Instructional Assistant/Paraprofessional: Special Education | | | | |
| Interpreter for Parent Meetings (IEPs, SSTs, or Workshops) | | | X | |
| Library Media Tech | | Not allowable under Title I | X | |
| Intervention Teacher | X | Academic Intervention and/or EL support | X | |
| Nurse | | | | X |
| School Community Liaison | X | | X | |
| School Psychologist | | Not allowable under Title I | X | |
| Site Academic Coach | X | | X | |
| Social Worker | | X | X | |
| Teacher per diem | X | Intervention or PD | X | |
| Teacher Substitutes: academic conferencing; professional learning; collaborative time | X | | X | |
| Translation Services for Parent Communication | | | X | |

Reference Guide for the Appropriate Use of Discretionary Funds to Avoid the Appearance of a Gift of Public Funds

Anything purchased by the district must be in compliance with the law and local board policy, and cannot be considered a gift of public funds. Questions often arise about the giving of gifts, which has a personal as opposed to public character. Contrary to what often occurs in schools, gifts are not allowable, even if the amount is small. Although some school administrators may feel that the school or district benefits from positive relationships established by providing gifts to students, parents, or families, the real public relations value is of primary benefit to the respective individual leaders involved, not to the school entity itself as an institution.

Expenditures of discretionary funds must be for a direct and primary public purpose to avoid being a gift. An approved public purpose, including those identified by the superintendent's office and human resources (for recruitment and retention) not listed below, must be within the scope of a school district's jurisdiction and purpose, which does not extend to purposes such as aid to the indigent or the promotion of social welfare.

Also, once funds are donated to a school/school district (including ASBs/USBs), those funds become the property of the school/school district. As such, they are subject to the same restrictions as all funds in the possession of the district. That is, the funds become public funds with the same legal requirements regarding their use.

If a school district's governing board has determined that a particular type of expenditure serves a public purpose, courts will almost always defer to that finding. Thus, if the district has a board policy or has received board approval stating that specific items are allowable, there is more certainty that the expenditure(s) might be considered allowable. The following table of possible expenditures has been reviewed by the PSUSD Board of Education for use in schools and district center facilities. The absence of an item listed below related to determining an

allowable use of discretionary funds shall be interpreted as that item not being allowable at this time.

For additional information about the appropriate use of funds to avoid the appearance of a gift of discretionary public funds, please call Tony Carrillo, Director of Fiscal Services, at (760) 883-2710, extension 480-6053.

| Item | General Fund R#0001 | Petty Cash | Donations* R#0400, 0451 | Conditions for Use |
|--|---------------------|------------|-------------------------|---|
| Attendance Incentives | X | | X | With pre-approval from Ed. Services (Elem./Sec.)- use appropriate purchasing processes. |
| Awards Gift Cards - Students | X | | X | Gift cards for students are allowed only under specific circumstances and must be pre-approved by the Director of Fiscal Services |
| Awards/Plaques - Students | X | X | X | These types of purchases are allowed, please see Board Policy & Administrative Regulations 5126 for details. |
| Awards/Plaques - Staff | X | X | X | Limit to twice a year, tracked by elementary or secondary directors. See Board Policy & Administrative Regulations 5126 for details. |
| Food/Beverages for Parents, Students | X | X | X | An agenda and sign-in sheet must be submitted as documentation. Food and beverage costs should be modest and aligned with the event's purpose (e.g., academic workshops, parent engagement nights). This applies only when the event has a clear instructional or engagement-related purpose. |
| Food/Beverages for Students (snacks) | X | X | X | Snacks for students may be provided only under special circumstances—such as during state testing or long instructional blocks—and only for students who demonstrate a documented need. Snacks must not be used as a reward or incentive. |
| Food/Beverages for staff/break room supplies (coffee, creamer, cakes, etc.) | | | X | These items are considered personal in nature and may not be purchased with public funds under any circumstance. |
| Food/Beverages- Working Welcome Back Events | X | X | X | Allowable only if the event includes a structured, work-related agenda (e.g., staff training or planning). Documentation must include both the agenda and a sign-in sheet. Costs must align with the meal guidelines. |
| Gift Certificates /Other Gifts – Staff | X | | X | Permitted only in exceptional circumstances and must be pre-approved in writing by the Director of Fiscal Services. |
| Graduation Supplies | X | X | X | Ceremonial supplies and services. |
| Open Purchase Orders | X | | X | Pre-approval is only through Fiscal Services, S&F Programs, and Elementary or Secondary Directors. |
| Party Supplies/Flowers (balloons, streamers, food, etc.) | | | X | These items are considered personal in nature and may not be purchased with public funds under any circumstance. |
| School-based awards, scholarships, gifts, presents, or donations to help students or staff in need | | | X | These items are considered personal in nature and may not be purchased with public funds under any circumstance. |
| Staff Appreciation Gifts (including retirement) | X | | X | General Fund dollars may be used once per year for Staff Appreciation Day and/or staff retirement recognition. A reasonable cost per person must be maintained, and prior approval is required from the site's Assistant Superintendent |
| Staff “working” breakfast/lunches/meals (includes staff appreciation and or Welcome Back Events) | X | X | X | Permitted when tied to a structured work-related activity such as training or planning. Both an agenda and sign-in sheet are required. Meal costs should be reasonable and as a guideline, follow the district’s maximum reimbursement rates: \$20 Breakfast, \$25 Lunch, \$40 Dinner per person. |

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| T-shirts and/or other clothing with/ without school or district logos for staff | X | | X | Limit to twice a year. Message/logo must be school/program related, and tracked by elementary or secondary directors. |
| T-shirts and/or other clothing with/ without school or district logos for all and/or targeted students/student groups (not including PE uniforms) | X | | X | Limit to twice a year. Message/logo must be school/program related, and tracked by elementary or secondary directors. |

*Donated funds must first be used for the purpose intended by the donor; any remaining funds may be used at the site's discretion for those expenses listed above.