# Allowable Uses of Funds Under Title I, Part A, By Object Code

Please note that this document is not all inclusive and is subject to revision. Items not listed may be verified by checking the approved application in OMEGA. Specific questions about whether reimbursement requests are allowable can be directed to the Title I Specialist:

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# **Purpose of Title I, Part A:**

The purpose of this title is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. (§1001 of ESEA, as amended)

## **Supplement Not Supplant:**

- The statute requires an SEA or LEA to use Title I funds only to supplement the funds that would, in the absence of those Title I funds, be made available from state and local sources for the education of students participating in Title I programs, and not to supplant such funds. [ESEA, as amended, section 1118(b)(1)]
- An LEA must demonstrate that the methodology used to allocate state and local funds to its schools ensures that each Title I school receives all of the state and local funds it would otherwise receive if it were not receiving Title I funds.

  [ESEA, as amended, section 1118(b)(2)]
- Consistent with the statute, if an LEA is required by law to provide funding to schools for a specific purpose, the LEA must provide such funds to Title I schools on the same basis as it provides such funds to non-Title I schools, subject to application of the "exclusion" provision.
  - This includes funds needed to provide services that are required by law for students with disabilities and English learners. [ESEA section, as amended, 1114(a)(2)(B)]

### **Considerations:**

- Does the activity meet the intent and purposes of Title I, Part A?
- Is the program being implemented evidenced-based or are there data to demonstrate its effectiveness?
- Is the service provided based on needs identified in the comprehensive needs assessment of the schoolwide plan?
- Do services provided meet the needs of students who are failing, or most at risk of failing to meet state standards?
- Are parents of Title I students involved in the planning of activities?

- In a targeted assistance program, are only the Title I students benefiting from services?
- Are the service and the cost of the service reasonable?

# **Object Code: 1000 Personal Services**

#### Allowable:

- Salaries for administrators and clerical support staff that manage Title I, Part A
- Salaries for Title I, Part A, teachers, coaches, specialists, interventionists, paraprofessionals, family and parent engagement specialists/liaisons, behavioral specialist/coach (based on a documented need)
- Translators/interpreters to translate or interpret Title I specific documents and services
- Tutors
- Stipends for Title I staff participating in activities such as professional development or school reform planning outside regular employment hours
- Stipends for staff providing extended learning time
- Technology personnel who maintain Title I equipment and/or provide professional development on the use of technology
- Stipends to pay for child care to enable parents to attend family and parent engagement activities
- Homeless liaison
- Incentive pay in hard to staff schools

### **Possibly Allowable:**

- Substitutes for Title I, Part A, funded staff
- Class size reduction teachers
- Substitutes for non-Title I, Part A, staff in targeted assistance schools

### **Not Allowable:**

- Principals, Assistant Principals
- Non-Title I, Part A, funded classroom teachers and other staff in targeted assistance schools
- Costs that have not been incurred (i.e. future salaries)

# **Object Code: 2000 Employee Benefits**

#### Allowable:

For allowable salaries as cited in Object Code 1000.

# **Object Code: 3000 Purchased/Contracted Services**

### Allowable:

- Professional development paid directly to the vendor including:
  - o Professional development for Title I, Part A, funded staff and additional staff who directly impact the academic achievement of identified children in *targeted assistance schools* in areas such as training:
    - in the federal core content subjects (English, reading, mathematics, language arts, science, social studies);
    - in evidence-based instructional strategies;
    - to improve student behavior and classroom management;
    - to involve parents in their children's education;
    - to use data and assessments to improve teaching and learning
  - Professional development for Title I, Part A, funded administrators and clerical support staff
  - o Professional development in the areas noted above and additional areas for reform as noted in the schoolwide plan
- Contracted services provided by instructional coaches, mentors, tutors, consultants, data analysts
- Contracted services for translators/interpreters to translate or interpret Title I specific documents, including English Learner notification letters, and meetings to provide information to parents regarding Title I requirements.
- Software subscriptions and site licenses for technology intervention programs (ex. Study Island, I Can Learn, BrainPop, etc.)
  - o Software subscriptions and site licenses in excess of \$25,000 must be reported under OC3000
- Purchased services for homeless students
- Family and parent engagement activities for parents
- Food for family and parent engagement activities paid directly to the vendor, including a reasonable tip for delivery (total within per diem)
- Conference registrations, hotel, and travel paid directly to the vendor, including to credit card vendors
- Contracted services for extended learning time
- Contracted services to pay for child care to enable parents to attend family and parent engagement activities
- All coursework (paid to the vendor and to the participant)
- Field trip expenses for Title I, Part A, students related to SOL content
- Travel expenses for parents to attend school activities

### **Possibly Allowable:**

- Professional development for pupil service personnel (librarians, guidance counselors, psychologists, etc.) is allowable in *schoolwide schools* if the division provides justification that the professional development contributes to the goals of the schoolwide plan
- Field trip expenses for Title I, Part A, identified students in *targeted assistance schools*, and any students attending Title I, Part A, funded preschools or *schoolwide schools*. Field trips must be directly related to academic achievement, including plays related to SOL.
- Working meals for Title I professional development to support the academic needs of students
- Contracted services or activities to support the transition from middle to high school or from high school to postsecondary education such as access to dual enrollment courses and career counseling
- Contracted services or activities to support efforts to reduce the overuse of discipline practices that remove students from the classroom
- Contracted services to maintain or lease Title I, Part A, office equipment, such as a copy machine
- Contracted services to assemble equipment purchased with Title I funds
- Rental car for travel at conferences
- Tuition for coursework for add-on endorsement

#### Not Allowable:

- Field trips for the sole purpose of entertainment, including amusement, diversion, and social activities
- Contracted food services for students
- Family and parent engagement activities/food for non-Title I parents (Targeted Assistance Programs)
- Contracted training required by state law or local requirements, such as dyslexia or CPR training
- Individual Memberships
- Costs of advertising and public relations designed solely to promote the non-federal entity (i.e. the school or division)
- Costs that have not been incurred (i.e. future programs)
- Interpreters for regular, non-title I, required school events such as parent teacher conferences

# **Object Code: 4000 Internal Services**

#### Allowable:

In-house services that support the Title I, Part A, program for targeted assistance schools or schoolwide schools such as:

- Printing charges
- Snacks/food prepared by the LEA for Pre-K Title I students, and approved family and parent engagement activities
- Homeless and foster care transportation
- Field trip and extended learning program transportation
- Travel expenses for parents to attend school activities
- Transportation for homeless students for required school activities and additional school requirements, such as travel to get immunizations

#### **Not Allowable:**

Internal services to support the basic operation of a school

## **Object Code: 5000 Other Charges**

#### Allowable:

- Indirect costs associated with Title I program administration at restricted rates
- Conference registration and related travel expenses (lodging, transportation, meals for allowable conferences paid directly to participant)
- Travel expenses for Title I, Part A, funded employees related to home visits, parent outreach, etc.
- Telecommunications expenses, utilities, and copier leases
- Postage to fulfill program requirements
- Individual hotspots for staff and students as part of a contracted service
- Tips for meals during travel as long as the total cost does not exceed the per diem

#### **Not Allowable:**

- Individual memberships or subscriptions
- Cost of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities)
- Conference attendance that doesn't support the Title I program plan/program, reimbursed to the individual

## **Object Code: 6000 Materials and Supplies**

#### Allowable:

Technology equipment, training materials, student materials, and supplies for Title I, Part A, identified students and staff in *targeted* assistance schools or any students and instructional staff in Title I, Part A funded preschools or schoolwide schools. Examples include:

- Supplemental instructional books for teachers and/or students
- Paper
- Toner
- Computers/laptops/iPads including warranties and maintenance based on % of funds used for the purchase
- Student response devices ("clickers")
- Earphones/headsets
- Furniture (if not required to operate a basic program, for supplemental instruction)
- Flash drives
- Software (one time purchase for supplemental programs, intervention programs)
- Professional development books for teachers
- Equipment for family and parental engagement centers
- Food for family and parent engagement activities from a grocery store or its equivalent, such as Walmart, Food Lion, Costco, etc.
- Clothing and shoes for homeless students if necessary to meet a school's dress or uniform requirement or to participate in physical education classes
- Magazine subscriptions with a programmatic purpose
- Pre-K snacks

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- Food for teaching concepts, M&Ms for counting
- Book vending machines
- Board and card games to teach mathematics and literacy concepts

## **Possibly Allowable:**

- Non-food incentives for performance under \$10 each
- Food for homeless students
- Gas cards for parents of homeless students
- T-shirts for Pre-K students (only) for purposes of safety or transition
- Tablecloths for sanitation purposes

#### **Not Allowable:**

- Incentives for attendance or participation
- Cash awards/Prepaid gift/cash cards—i.e. Amazon, I-tunes, Wal-Mart, convenience stores etc.
- Food for students
- Materials and supplies to support entertainment activities or that do not have a programmatic purpose, such as Oriental Trading decorations
- Promotional items and memorabilia such as T-shirts, caps, tote bags, imprinted pens, and key chains
- Costs of advertising and public relations designed solely to promote the non-federal entity (i.e. the school or division)
- T-shirts or articles of clothing for parents or students (the only exceptions are Pre-K or homeless see above)
- Playground equipment (including balls, etc.)
- Permanent furniture and carpet
- Shipping for returned items and cancellation fees
- Sound or PA system

# **Object Code: 8000 Capital Outlay**

## **Possibly Allowable:**

Technology and purchases necessary for Title I program administration that exceed \$5,000 per item or exceed the LEA's locally-determined threshold to classify equipment purchases

#### **Not Allowable:**

- Capital outlay purchases to support the basic operation of a school
- Capital outlay does not include the purchase of equipment costing less than \$5,000 unless the LEA as set a lower capitalization threshold

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