Title I: An Allowable Cost or Not?

Fall Title I Statewide Conference
November 5, 2014
Purpose

- Clarify whether expenses are allowable under Title I or not
- Give districts tools to determine allowable costs in the future
Why not just make a list of allowable costs?

- It’s not that simple (We wish it was!)
- Each district supports different activities. Therefore what might be supplemental in one district might not be supplemental in another.
- There are key differences between Targeted Assistance and Schoolwide programs.
Allowable or Not Allowable?

St. Michael’s Private School is entitled to $2,013 in Title I funding this year. To simplify the process for everyone, I sent the headmaster a check for the exact amount to be used for supplemental academic support for their lowest achieving students.
Not Allowable

- Districts are required to maintain control of public funds at all times.
- Districts are NEVER allowed to simply write a check to a private school, and spending plans need to be agreed upon in advance.
- Question to ask yourself: “Does my district control the use of all Title I funds, including for private school services?”
Allowable or Not Allowable?

毎の私たちの五つの学区の小学校には、0.5 FTEのリーダーシップ介入士がいます。我々は、私たちのTitle I基金を活用して、我々の二つのTitle I学校で、その介入士を1.0 FTEとすることを提案しています。
Allowable

⭐ These funds are providing an *additional* service for low-achieving students in Title I schools

⭐ Title I funds must always be supplementing what the school or district is providing

⭐ Question to ask yourself: “Is this activity *in addition* to what services or supports would be provided without Title I funds?”
Allowable or Not Allowable?

★ Our district received major funding cuts this year so rather than terminate our only 3rd grade teacher, we are going to have Title I funds support some of his salary
Not Allowable

- Title I funds cannot support an expense that must be and has been paid for by the district
- Question to ask yourself: “Did the district previously pay for this expense with local funds? Absent Title I funds, would the district be required to support the activity?”
Allowable or Not Allowable?

★ Even though this student is eligible for the Title I math intervention our school provides, we are not going to serve him with Title I funds because his IEP already requires that he receive additional math support.
Allowable

- Students can be skipped for Title I services if certain conditions are met
- Students with an IEP have equal access to Title I services as those without one
- Schools can serve the student with Title I funds as long as the intervention is in addition to what the IEP requires
- Question to ask yourself: “Will the Title I activity accelerate that student’s learning?”
Allowable or Not Allowable?

We have identified five students experiencing homelessness in our district. We are setting aside some Title I funds to purchase each of them winter coats and school supplies.
Allowable

★ Title I funds can support activities or supplies that improve achievement for students experiencing homelessness

★ Question to ask yourself: “Will this intervention better help prepare a student for learning?”

★ Question to ask yourself: “Are there other resources available to address this need?”
Allowable or Not Allowable?

★ Our Title I reading interventionist had to take a sudden leave of absence in FY14. Therefore, we are going to use the rest of the money earmarked for her salary to bring in an outside consultant to help improve our reading instruction for FY15.
Allowable

- The activity is continuing; only the details have changed
- Districts are allowed to make changes throughout the two year grant life cycle as long as the district follows the amendment process
- Question to ask yourself: “Are we doing the activity we are approved to do?”
- *Reminder:* budget changes of 10% or more require an amendment
Allowable or Not Allowable?

The only time we use Title I funds to pay for food is:
1. Family engagement nights
2. For our teachers when they have all-day professional development that is 100% supported by Title I and there are no outside food options available
Allowable

Federal guidance on allowable uses of Title I funds for food: “Reasonable expenditures for refreshments or food, particularly when such meetings extend through mealtime, are allowable.”

Question to ask yourself: “Is providing food a necessary expense for this activity and are the costs reasonable?”
Allowable costs are...

⭐ Supplemental
⭐ Academically related
⭐ Focus on helping the lowest achieving students succeed
What about the gray areas?

⭐ Allowable costs are not always black or white definitive answers
⭐ If you’ve asked yourself the aforementioned questions and are still unsure: contact us!
⭐ Asking beforehand can save a lot effort
⭐ Contact us:
  ⭐ Phone: 781-338-6230
  ⭐ Email: titlei@doe.mass.edu
  ⭐ Website: http://www.doe.mass.edu/apa/titlei