

Title IA:
Guidance on Allowable and
Unallowable Expenditures



New Hampshire

Department of Education

Purpose of Title IA

- The purpose Title I, Part A under the Every Student Succeeds Act (ESSA) is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Title I, Part A funds support eligible students identified by schools as failing or most at risk of failing to meet the State's challenging academic standards.

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:**
- 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.
- 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.
- Ensure that the activity is not one of the prohibited activities in ESEA Section 8526, as amended by the ESSA.

Required Title IA 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. (allowable uses for Homeless Set Aside on another slide)
- **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.
- **Equitable Services**
 - Any LEA that has a non-public within the district enrollment area or has known students living in the enrollment area attending a non-public schools must consult with the non-public to provide Equitable Services

Allowable and Unallowable

Allowable Expenditures

- **Supports for Title I Students:**
 - Certified teachers and teaching assistants
 - Proportional benefits for Title I salaries
 - Pre-K, summer, and extended day programs
 - Transportation for Title I programs if not otherwise available
- **Support Staff for Title I Programs:**
 - Data management staff for Title I only
 - Secretary and/or clerks for Title I only
 - Title I coordinators and administrators

Unallowable Expenditures

- **General Expenditures:**
 - Base pay for principals (contract hours)
 - Superintendents and deputies with districtwide responsibilities
 - Direct reimbursements to private schools
 - Student Assessments
- **Targeted Assistance Programs:**
 - Costs/services that are not targeted to at-risk students
 - Whole School Programs

Allowable and Unallowable

Allowable Expenditures

- **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
- **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

Unallowable Expenditures

- **Supplies and Materials:**
 - Food and refreshments – except for within Parent and Family Engagement activities
 - 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

Allowable and Unallowable

Allowable Expenditures

- **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 for a Targeted Assistance School
 - 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.
 - Student awards for effort and achievement (not participation), which are nominal and non-monetary

Unallowable Expenditures

- **Other:**
 - Field trips for entertainment or recreational purposes only
 - Construction, Remodeling, or Renovation projects are not allowable

Allowability Considerations

- **Be used to supplement, not supplant, state and local funds**
 - Title IA funds may not be used for activities that are required by federal, state, or local law or regulation
 - LEAs must use a Title I neutral budget methodology to allocate state and local funds to schools. This budget methodology must provide each Title I school with all of the state and local money it would receive if it did not participate in the Title I program
- **Be consistent with the intent and purposes of Title IA**
 - How does the proposed activity close achievement gaps for students?
 - How does the proposed activity increase achievement of students identified as having the greatest need for assistance?
 - Schoolwide Program: How does the proposed activity improve the educational program of the entire school and increase achievement of all students?
- **Be reasonable and necessary to carry out the purpose of the grant**
 - What is the identified need that this proposed activity is meeting?
 - How was this need determined? Is there data available to support this identified need? What data sources were consulted and what did those sources reveal?
 - What is the breadth of impact that this activity will have?
 - Are all associated costs reasonable?
 - Do the involved parties (schools, principals, teachers, etc.) have the capacity to engage in and/or implement this activity right now?

Homeless Set Aside:

Two principles govern the usage of homeless set-aside funds:

1. The services must be reasonable and necessary to assist students experiencing homelessness to take advantage of educational opportunities

2. The funds must be used only as a last resort when funds or services are not available from other public or private sources

Allowable Uses for Homeless Set Aside

- items of clothing, particularly if necessary to meet a
- school's dress or uniform requirement;
- clothing and shoes necessary to participate in
- physical education classes;
- student fees that are necessary to participate in the
- general education program;
- personal school supplies;
- birth certificates necessary to enroll in school;
- immunizations;
- food;
- medical and dental services;
- eyeglasses and hearing aids;
- counseling services to address anxiety related to
- homelessness that is impeding learning;
- outreach services to students living in shelters, motels, and other temporary residences;
- extended learning time (before and after school,
- Saturday classes, summer school) to compensate for
- lack of quiet time for homework in shelters or other
- overcrowded living conditions;
- • tutoring services, especially in shelters or other
- locations where homeless students live;
- • parental involvement specifically oriented to
- reaching out to parents of homeless students;
- • fees for Advanced Placement (AP) and International
- Baccalaureate (IB) testing;
- • fees for college entrance exams such as the SAT or ACT
- Transportation above and beyond the normal costs for transporting students

Resources

- Title IA Laws and Regulations:
- [Legislation and Regulations - Office of Elementary and Secondary Education](#)
- NCHE Title IA Homeless Set Aside Brief:
- [Serving Students Experiencing Homelessness under Title I, Part A \(ed.gov\)](#)
- NHDOE Title IA Website:
- [Title I Part A | Department of Education \(nh.gov\)](#)

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