

Title II-A: Allowable Equitable Services and Programs

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Instructional or Professional Staff to Provide Services

Allowable

1. Salaries and benefits for district staff (including private school staff hired outside of their contracted time to provide equitable services as district employees) and contractors providing Title II-A equitable services as mentors or academic coaches, including incentive pay.ⁱ

Unallowable

1. Private school employee's salary and benefits.ⁱⁱ
2. Paid time to design, develop, align, map and/or revise curriculum and/or assessments.ⁱⁱⁱ
3. Private school educator salaries to reduce class size.^{iv}
4. Substitute teacher salaries.^v
5. Incentive pay for private school educators.^{vi}
6. Direct reimbursement to the private school.^{vii}

District Administrator Salaries

Unallowable

1. Must be taken from the off-the-top administrative set aside calculated from the total Title II-A allocation and not the equitable share (see [Module 3](#)).^{viii}
2. Private school administrator salaries.^{ix}

District Support Staff Salaries

Unallowable

1. Must be taken from the off-the-top administrative set aside calculated from the total Title II-A allocation and not the equitable share (see [Module 3](#)).^x
2. Private school support staff salaries.^{xi}

Fringe Benefits

Unallowable

1. Must be taken from the off-the-top administrative set aside calculated from the total Title II-A allocation and not the equitable share (see [Module 3](#)).^{xii}
2. Benefits for private school employees.^{xiii}

Indirect Costs

Unallowable

1. Must be taken from the off-the-top administrative set aside calculated from the total Title II-A allocation and not the equitable share (see [Module 3](#)).^{xiv}

Stipends to Private School Employees

Allowable

1. Educator stipends to lead or participate in workshops or trainings that improve content knowledge or classroom practice for hours outside of contracted time with the private school.^{xv}

2. Educator stipends for participation in Professional Development (PD) for hours outside of contracted time with the private school.^{xvi}
3. Staff training events, as allowable under Title II-A for hours outside of contracted time with the private school.^{xvii}

Unallowable

1. Private school salaries and/or benefits.^{xviii}
2. Stipends for substitute teachers.^{xix}
3. Direct reimbursement to the private school.^{xx}

Professional Development (PD) or Training

Allowable

1. High quality, personalized PD on:^{xxi}
 - a. Effectively integrating technology into curricula and instruction; or
 - b. Using data to improve student achievement and understand how to ensure individual student privacy is protected; or
 - c. Effectively engaging parents, families, and community partners to coordinate services between the school and the community; or
 - d. Helping all students develop the skills essential for learning readiness and academic success; or
 - e. Participating in opportunities for experiential learning through observation.
2. Developing programs and activities that increase the ability of teachers to effectively teach children with disabilities, including children with significant cognitive disabilities, and English learners, which may include the use of multi-tier systems of support and positive behavioral intervention and supports.^{xxii}
3. Providing programs and activities to increase the:^{xxiii}
 - a. Knowledge base of educators on instruction in the early grades and on strategies to measure whether young children are progressing; or
 - b. Ability of educators to meet the needs of students through age 8, which may include providing joint professional learning and planning activities for school staff and educators in preschool programs that address the transition to elementary school.
4. Training for educators on:^{xxiv}
 - a. Selecting and implementing formative assessments, designing classroom-based assessments, and using data from such assessments to improve instruction and student academic achievement, which may include providing stipends for additional time for teachers to review student data and respond, as appropriate and outside of contracted time; or
 - b. Preventing and recognizing child sexual abuse.
5. In-service training for school personnel on:^{xxv}
 - a. Techniques and supports necessary to facilitate student access to appropriate mental health services.
6. In-service training for school personnel on improving school conditions for learning such as:^{xxvi}

- a. School safety; or
 - b. Peer interactions; or
 - c. Drug and alcohol abuse prevention; or
 - d. Chronic absenteeism; or
 - e. Other issues related to school conditions for student learning.
7. Identifying gifted and talented children and implementing instructional practices that support the education such as enrichment, acceleration, and curriculum compacting activities and dual or concurrent enrollment programs in secondary school and postsecondary education.^{xxvii}
 8. Supporting instructional services provided by effective school library programs.^{xxviii}
 9. Developing and providing PD and other comprehensive systems of support for educators to promote high-quality instruction and instructional leadership in STEM subjects.^{xxix}
 10. PD on:^{xxx}
 - a. Effective strategies to integrate rigorous academic content; or
 - b. Career and technical education, and work-based learning.

Unallowable

1. Direct reimbursement to the private school.^{xxxi}
2. PD for private school employees that does not impact student academic achievement, such as PD for admissions or business office personnel.^{xxxii}

Clarifications

1. PD or training must be focused on improving teaching and student learning and achievement.^{xxxiii}
2. Title II-A must only fund PD or training, or portions of PD or training, that is fully [secular, neutral and non-ideological](#).^{xxxiv}
3. PD or training may be in-state or out-of-state as long as expenditures are reasonable and necessary.^{xxxv}
4. All costs must total less than \$5,000 per participant or else approval from the US Department of Education is required.^{xxxvi}
5. PD must meet the ESEA definition of PD (see [Module 6](#)).^{xxxvii}

Travel and Conference Expenditures

Allowable

1. Registration fees for PD.^{xxxviii}
2. Expenses for transportation and/or mileage, parking, per diem meals, and lodging if the costs are reasonable and necessary.

Unallowable

1. Direct reimbursement to the private school.^{xxxix}
2. Working lunches outside of per diem meals and refreshments.^{xl}

Clarifications

1. Title II-A must only fund PD, or portions of PD, that is [secular, neutral and nonideological](#).^{xi}
2. All costs must total less than \$5,000 per participant or else approval from the US Department of Education is required.^{xlii}
3. All PD must supplement and not supplant what the private school already provides.^{xliii}

Supplies and Materials

Allowable

1. Supplies to be used strictly for PD, such as chart paper, pens, binders, easels, etc.^{xliv}
2. Materials to be used strictly for PD, such as books, instructional resources, etc.^{xlv}
3. Printing or copying of PD materials.^{xlvi}

Unallowable

1. Supplies and materials to be used in the classroom or by students.^{xlvii}
2. Books, software, instructional technology for the private school in general.^{xlviii}
3. Evaluation system-related data systems to manage linking student-teacher data.^{xlix}
4. Direct reimbursement to the private school.^l

Clarifications

1. Title II-A must only fund PD, or portions of PD, that is [secular, neutral and nonideological](#).^{li}
2. All materials and supplies paid for with Title II-A funds are the property of the district, must be labeled as such and must be included on district [inventory](#) lists, as applicable.^{lii}

Equipment

Allowable

1. Equipment to be used only for teacher evaluations and must be labeled for such use.^{liii}

Unallowable

1. Equipment for general private school use (including hardware, computers, or other devices).^{liv}
2. Software or licenses.^{lv}
3. Hardware or software for student use.^{lvi}
4. Direct reimbursement to the private school.^{lvii}

Clarifications

1. Equipment paid for with Title II-A funds are the property of the district, must be labeled as such and must be included on district [inventory](#) lists, as applicable.^{lviii}

Other Costs

Allowable

- 1.
2. Cost of online job posting for educators that would meet specific needs of students, and not the general needs of the private school, and perform supplemental duties (e.g.:

differentiated instruction specialists for students performing below grade level or to hire a Title I-A teacher for equitable services).^{lix}

3. Services of a job recruiter to hire educators as described above, if reasonable and necessary.^{lx}
4. Cost of endorsements and college level courses that supplement the skillset or knowledge of the educator and directly meet identified student needs.^{lxi}
3. PD memberships or subscriptions that are [secular, neutral and nonideological](#).^{lxii}
5. Space rental for PD events.^{lxiii}

Unallowable

1. Costs to hire or recruit general classroom teachers.^{lxiv}
2. Courses for an educator’s licensure, if licensure is required by state law or private school employment contract.^{lxv}

ⁱ [Title VIII Equitable Service NRG](#) (2023) C-21, [ESEA](#) section 8501(d)(2), [ESEA](#) section 2103(b)(3)(B)(iv)

ⁱⁱ [Title VIII Equitable Service NRG](#) (2023) H-14, [ESEA](#) section 8501(d)

ⁱⁱⁱ [Title VIII Equitable Service NRG](#) (2023) H-14, [ESEA](#) section 8501(d)

^{iv} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) section 2103(b)(3)(D), [34 CFR § 299.8\(b\)\(1\)](#)

^v [Title VIII Equitable Service NRG](#) (2023) H-14, [ESEA](#) section 8501(d)

^{vi} [Title VIII Equitable Service NRG](#) (2023) H-14, [ESEA](#) section 8501(d)

^{vii} [Title VIII Equitable Service NRG](#) (2023) H-15,

^{viii} [Title VIII Equitable Service NRG](#) (2023) B-8, [34 CFR § 299.7\(a\)\(2\)](#), [2 CFR Part 200 Subpart E – Cost Principles](#)

^{ix} [Title VIII Equitable Service NRG](#) (2023) H-14, [ESEA](#) section 8501(d)

^x [Title VIII Equitable Service NRG](#) (2023) B-8, [34 CFR § 299.7\(a\)\(2\)](#), [2 CFR Part 200 Subpart E – Cost Principles](#)

^{xi} [Title VIII Equitable Service NRG](#) (2023) H-14, [ESEA](#) section 8501(d)

^{xii} [Title VIII Equitable Service NRG](#) (2023) B-8, [34 CFR § 299.7\(a\)\(2\)](#), [2 CFR Part 200 Subpart E – Cost Principles](#)

^{xiii} [Title VIII Equitable Service NRG](#) (2023) H-14, [ESEA](#) section 8501(d)

^{xiv} [Title VIII Equitable Service NRG](#) (2023) B-8, [34 CFR § 299.7\(a\)\(2\)](#), [2 CFR Part 200 Subpart E – Cost Principles](#)

^{xv} [Title VIII Equitable Service NRG](#) (2023) C-20, [ESEA](#) section 8501(d)(1)

^{xvi} [Title VIII Equitable Service NRG](#) (2023) C-20, [ESEA](#) section 8501(d)(1)

^{xvii} [Title VIII Equitable Service NRG](#) (2023) C-20, [ESEA](#) section 8501(d)(1)

^{xviii} [Title VIII Equitable Service NRG](#) (2023) H-14, [ESEA](#) section 8501(d)

^{xix} [Title VIII Equitable Service NRG](#) (2023) H-14, [ESEA](#) section 8501(d)

^{xx} [Title VIII Equitable Service NRG](#) (2023) H-15, [ESEA](#) section 8501(d)

^{xxi} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) section 2103(b)(3)(E)

^{xxii} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) 2103(b)(3)(F)

^{xxiii} [Title VIII Equitable Service NRG](#) (2023) C-2, [ESEA](#) 2103(b)(3)(G)

^{xxiv} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) 2103(b)(3)(H), (L)

^{xxv} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) 2103(b)(3)(I)

^{xxvi} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) 2103(b)(3)(I)

^{xxvii} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) 2103(b)(3)(J)

^{xxviii} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) 2103(b)(3)(K)

^{xxix} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) section 2103(b)(3)(M)

^{xxx} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) section 2103(b)(3)(O)

^{xxxi} [Title VIII Equitable Service NRG](#) (2023) H-15, [ESEA](#) section 8501(d)

^{xxxii} [Title VIII Equitable Service NRG](#) (2023) H-6, [ESEA](#) section 2001, Purpose

^{xxxiii} [Title VIII Equitable Service NRG](#) (2023) C-10, [ESEA](#) section 8501(a)(2)

^{xxxiv} [Title VIII Equitable Service NRG](#) (2023) C-10, [ESEA](#) section 8501(a)(2)

^{xxxv} [Title VIII Equitable Service NRG](#) (2023) C-18, [2CFR § 200.403\(a\)](#), [2CFR § 200.404](#)

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- xxxvi [Title VIII Equitable Service NRG](#) (2023) C-19, [2 CFR § 200.1](#), [US Department of Education's Dec 8, 2022 letter](#)
- xxxvii [Title VIII Equitable Services NRG](#) (2023) H-7, H-8 [ESEA](#) section 8101(42)
- xxxviii [Title VIII Equitable Service NRG](#) (2023) C-19, [2 CFR § 200.1](#), [US Department of Education's Dec 8, 2022 letter](#)
- xxxix [Title VIII Equitable Service NRG](#) (2023) H-15, [ESEA](#) section 8501(d)
- xl [Title VIII Equitable Service NRG](#) (2023) C-19, [2 CFR § 200.1](#), [US Department of Education's Dec 8, 2022 letter](#)
- xli [Title VIII Equitable Service NRG](#) (2023) C-10, [ESEA](#) section 8501(a)(2)
- xlii [Title VIII Equitable Service NRG](#) (2023) C-19, [2 CFR § 200.1](#), [US Department of Education's Dec 8, 2022 letter](#)
- xliii [Title VIII Equitable Service NRG](#) (2023) C-9, [ESEA](#) section 2301, [34 CFR § 299.8\(a\)](#)
- xliv [Title VIII Equitable Service NRG](#) (2023) H-2, [ESEA](#) section 8101(44)
- xlv [Title VIII Equitable Service NRG](#) (2023) H-2, [ESEA](#) section 8101(44)
- xlvi [Title VIII Equitable Service NRG](#) (2023) H-2, [ESEA](#) section 8101(44)
- xlvii [Title VIII Equitable Service NRG](#) (2023) H-2, [ESEA](#) section 8101(44)
- xlviii [Title VIII Equitable Service NRG](#) (2023) H-6, [34 CFR § 299.8\(b\)\(1\)](#)
- xlvi [Title VIII Equitable Service NRG](#) (2023) H-2, [ESEA](#) section 8101(44)
- l [Title VIII Equitable Service NRG](#) (2023) H-15, [ESEA](#) section 8501(d)
- li [Title VIII Equitable Service NRG](#) (2023) C-10, [ESEA](#) section 8501(a)(2)
- lii [Title VIII Equitable Service NRG](#) (2023) C-16, [ESEA](#) section 8501(d)(1)
- liii [Title VIII Equitable Service NRG](#) (2023) H-2, [ESEA](#) section 8101(44)
- liv [Title VIII Equitable Service NRG](#) (2023) H-2, [ESEA](#) section 8101(44)
- lv [Title VIII Equitable Service NRG](#) (2023) H-2, [ESEA](#) section 8101(44)
- lvi [Title VIII Equitable Service NRG](#) (2023) H-2, [ESEA](#) section 8101(44)
- lvii [Title VIII Equitable Service NRG](#) (2023) H-15, [ESEA](#) section 8501(d)
- lviii [Title VIII Equitable Service NRG](#) (2023) C-16, [ESEA](#) section 8501(d)(1)
- lix [Title VIII Equitable Service NRG](#) (2023) H-6, [34 CFR § 299.8\(b\)\(1\)](#)
- lx [Title VIII Equitable Service NRG](#) (2023) H-6, [34 CFR § 299.8\(b\)\(1\)](#)
- lxi [Title VIII Equitable Service NRG](#) (2023) H-6, [34 CFR § 299.8\(b\)\(1\)](#)
- lxii [Title VIII Equitable Service NRG](#) (2023) C-10, [ESEA](#) section 8501(a)(2)
- lxiii [Title VIII Equitable Service NRG](#) (2023) H-6, [34 CFR § 299.8\(b\)\(1\)](#)
- lxiv [Title VIII Equitable Service NRG](#) (2023) H-6, [34 CFR § 299.8\(b\)\(1\)](#), [ESEA](#) section 2103(b)(3)(C)
- lxv [Title VIII Equitable Service NRG](#) (2023) C-9, [ESEA](#) section 2301, [34 CFR § 299.8\(a\)](#)