



# ESEA/ESSER Allowable Uses of Funds



*Idaho State Department of Education*

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# Today we will cover...



- Title I-A
  - School Improvement
  - Family & Community Engagement
- Title I-C
- ESSER
- Title II-A
- Title III-A
- Title IV-A
- Title V-B



# Allowable Uses of Funds



# Applies to all Title and ESSER grants



- Necessary
- Reasonable
- Allocable
- Conform to the Uniform Grant Guidance (UGG)  
2 CFR Part 200
- Terms and Conditions of the Grant Award
- Adequately Documented

# Title I-A: Improving Basic Programs



## Purpose

The purpose of Title I-A is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational gaps.

Title I-A provides supplemental funding to help low-income children served to meet the challenging State academic standards.

# Title I-A: Improving Basic Programs



- Salaries & benefits for all allocable FTEs in the CFSGA
- Supplies for running the program
- Educational materials
- Travel expenditures (including registration)
- Professional development & training
- Equipment
- Parent and family engagement activities
- Field trips tied to curricular academic activities
- Purchased services for contractors, presenters, capacity builders, instructional support etc.
- Subscriptions and memberships related to the program
- Recognition awards and incentives\*

\*Certificates, plaques, ribbons, small trophies or instructional-related items to be used in the classroom which are tied to instructional strategies and activities, and obtained at minimal cost

# Title I-A: School Improvement



- Salaries & benefits for all FTEs listed in the approved SWIP application
- Instructional supplies, including curriculum
- Technology and equipment
- Travel expenditures (including registration)
- Parent and family engagement activities
- Professional development and training
- Purchased services for contractors, presenters, capacity builders, instructional support etc.
- Transportation costs
- Field trips tied to curricular academic activities

\*These must all be accounted for the submitted Schoolwide Improvement Plan (SWIP).

# Family & Community Engagement



- Professional development for LEA and school personnel regarding parent and family engagement strategies
- Supporting programs that reach parents and family members at home or in the community
- Community partnerships
- Family literacy activities
- Light refreshments are allowed for family engagement activities if they are necessary to encourage attendance by parents and family members
- Field trips tied to curricular academic activities



# Unallowable items specific to Title I-A



- Expenditures that do not serve the purpose of the Title I-A program
- Expenditures in a non-Title I-A school. For example, LEA-level activities may only use Title I-A funds for Title I-A served schools.
- Expenditures for all students in a Targeted Assistance Program School
- Unreasonable, unnecessary costs

# Title II-A: Supporting Effective Instruction



## Purpose

- Increase student achievement consistent with the challenging State academic standards;
- Improve the quality and effectiveness of teachers, principals, and other school leaders;
- Increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and
- Provide low-income and minority students greater access to effective teachers, principals, and other school leaders.

# Title II-A: Supporting Effective Instruction



- Recruiting and retaining effective teachers
- Recruit qualified professionals from other fields
- Salaries/Stipends for mentors, instructional coaches, Title II-A program director, or substitutes for Title II-A professional development coverage
- Signing stipends for hard-to-fill positions
- Class size reduction
- Professional development
- Course credits
- Praxis testing fees
- Alternate Authorization fees
- Professional organization membership fees

# Unallowable items specific to Title II-A



- Regular teacher salaries
  - Core or curriculum classroom supplies for students
  - Background check fees or fingerprinting fees
  - Accreditation fees
  - State-required Dyslexia training
  - State-required assessment fees
  - Computers, iPads, most software
- Food is a questionable expense under Title II-A:
- ✓ must be for activities that are funded with Title II-A funds; and
  - ✓ Subject to federal policies regarding meetings

# Title III-A: English Language Acquisition



## Purpose

- To help ensure that English learners, including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English;
  - to achieve at high levels in academic subjects so that all English learners can **meet the same challenging State academic standards** that all children are expected to meet;
  - in establishing, implementing, and sustaining **effective language instruction educational programs** designed to assist in teaching English learners, including immigrant children and youth;
  - to **develop and enhance their capacity** to provide effective instructional programs designed to prepare English learners
  - to **promote parental, family, and community participation** in language instruction educational programs for the parents, families, and communities of English learners.

# Title III-A: English Language Acquisition



- Professional development to improve instruction for EL students
- Tutoring, academic assistance, supplementary instructional materials for English language acquisition
- Summer school programs for EL learners
- Parent and family engagement activities (not regular parental meetings which are required by the State or a part of Title I-A)
- Field trips tied to high-quality language instruction educational program

# Unallowable items specific to Title III-A



- May not use funds to administer the annual EL assessment used to identify and place students (includes WIDA and WIDA screener)
- May not use funds for purposes relating to the identification of ELs
- May not use funds to translate documents for parents (translation fees, interpretation fees)
- May not use funds to meet civil rights obligations to EL students

# Title I-C: Education of Migratory Children



## Purpose

- To assist States in supporting high-quality and comprehensive educational programs and services during the school year and, as applicable, during summer or intersession periods, that address the unique educational needs of migratory children.
- To ensure that migratory children who move among the States are not penalized in any manner by disparities among the States in curriculum, graduation requirements, and challenging State academic standards.
- To ensure that migratory children receive full and appropriate opportunities to meet the same challenging State academic standards that all children are expected to meet.
- To help migratory children overcome educational disruption, cultural and language barriers, social isolation, various health-related problems, and other factors that inhibit the ability of such children to succeed in school.
- To help migratory children benefit from State and local systemic reforms.



# Title I-C: Education of Migratory Children



- Salaries & benefits for migrant coordinator/director, family liaisons, teachers and paraprofessionals
- Travel for family liaisons, including travel for PD
- Supplies, including educationally-necessary supplies for migrant students, Parent Advisory Council supplies, summer school supplies, office supplies, recruiting supplies
- Instructional services for pre-school age children and instruction in elementary and secondary schools such as tutoring before and after school programs
- Summer school expenses (staff, transportation, curriculum, classroom supplies, hosting a bi-national teacher
- Cell phone and data reimbursement for liaison
- Travel (including registration) for conferences or professional development
- Technology for use by migrant students or by liaison
- Educational, support, and referral services to Out-of-School Youth (OSY) through age 21

# Unallowable items specific to Title I-C



Unallowable activities include, but are not limited to:

- Expenditures that do not serve the purpose of the Title I-C Program
- Expenditures for children not identified as Migrant children
- Unreasonable, unnecessary costs

# Title IV-A: Student Support and Academic Enrichment



## Purpose

The purpose of this subpart is to improve students' academic achievement by increasing the capacity of States, local educational agencies, schools, and local communities to—

- 1) Provide all students with access to a well-rounded education;
- 2) Improve school conditions for student learning; and
- 3) Improve the use of technology in order to improve the academic achievement and digital literacy of all students.

# Title IV-A: Student Support and Academic Enrichment



## Priority 1

- Create new or strengthen existing high-quality courses (music, art, foreign languages, advanced opportunities support, college advising, history, physics, STEM, etc.)
- Professional development for teachers
- Expeditionary learning events with a focus on nature, culture, STEM, geography, Idaho history, college campuses, etc.)
- Focus on under-served sub-populations

## Priority 2

- School-based counseling or mental health programs
- Health and safety practices in school
- Student safety/violence prevention through effective community
- Bullying prevention
- Suicide prevention
- Reduction of exclusionary discipline
- Evidence-based mental health awareness programs
- De-escalation of crisis situations

# Title IV-A: Student Support and Academic Enrichment cont.



## Priority 3

15% cap on software, equipment and devices

- Digital literacy/citizenship
- Supporting teachers to use data to inform instruction
- Support access for rural and remote areas to high-quality digital learn opportunities
- Universal design for learning integration
- Supporting teachers to use data to inform instruction

# Unallowable items specific to Title IV-A



- Expenditures exceeding 15% cap on the effective use of technology, such as software, equipment & devices
- Drug testing supplies
- Costs associated with the purchase of firearms, storage or training



## Purpose

It is the purpose of this part to address the unique needs of rural school districts that frequently—

- lack the personnel and resources needed to compete effectively for Federal competitive grants; and
- receive formula grant allocations in amounts too small to be effective in meeting their intended purposes.

# Title V-B: Rural Education



Spending options include:

- Any allowable use of funds under Title I-A
- Any allowable use of funds under Title II-A
- Any allowable use of funds under Title III-A
- Any allowable use of funds under Title IV-A
- Parent, Family and Community Engagement Activities



- Connectivity of Wifi-Hot spots
- Laptops/tablets for every student
- Upgrades for HVAC, doors/windowsAfter school tutoring
- Summer learning
- Extended school day programs
- Sanitation in school (hand sanitizer & dispensers, soap, Kleenex, wet wipes, etc.)
- Thermometers, PPE
- Social workers/counselors/nurses
- Refillable water stations, touchless water faucets
- Outreach/mental health services
- Evidence based curriculum to lessen learning loss
- Paraprofessionals
- Roofing/minor repairs on buildings
- Floor scrubbers/new flooring
- Professional development
- Any activity authorized by the Carl D. Perkins CTE ACT –use ESSER funds for a one time purchase.
- Any activity authorized by subtitle B of title VII of McKinney-Vento Homeless Assistance Act.
- Any activity planning and implementing activities related to summer learning or supplemental after school programs/family nights.
- Any activity to support high school seniors.

# Unallowable ESSER



- Goods or services for personal use (coffee cups, office décor, sweatshirts, t-shirts, water bottles, gift baskets)
- Ceremonies, banquets, or celebration expenditures
- Field trips for social, entertainment, or recreational purposes
- Gift cards, tickets to movies, or sporting events
- Meeting or event décor (flowers, balloons)
- Team dinners, food trucks, most food
- Payroll in the form of gift cards



# Universal Unallowable and Questionable Uses of Funds



# Unallowable Uses of Funds



- Gifts or items that appear to be gifts
- Souvenirs, memorabilia, or promotional items, such as T-shirts, sweatshirts, water bottles, tote bags, imprinted pens, and key chains (Title I-C exception)
- Ceremonies, banquets, or celebration expenditures, including décor
- Door prizes, movie tickets, gift certificates, passes to amusement parks, etc.
- Field trips for social, recreational or entertainment purposes



# Unallowable Uses of Funds cont.



- Construction, remodeling, or renovation (Except ESSER)
- Fund-raising activities - Costs of organized fund raising incurred to raise capital or obtain contributions are not allowable. Costs associated with training on fundraising are not allowable.
- Professional or Individual Liability Insurance - Professional liability insurance for individual employees
- Employer Contributions to Voluntary Retirement Plan- Employer contributions to an Employee's voluntary retirement plan, such as a 401k or 403b

# However...



The following items may be donated, but may not be purchased with grant funds:

- Gifts or items that appear to be gifts
- Souvenirs, memorabilia, or promotional items, such as T-shirts, caps, tote bags, imprinted pens, and key chains
- Door prizes, movie tickets, gift certificates, passes to amusement parks, etc.

# Questionable Uses of Funds - Food



- Is a working lunch necessary? Is food necessary to accomplish the directives and purpose of the grant program?
- Is there a genuine time constraint to get lunch due to a topic-packed agenda prohibiting time for lunch? Are there no meal places within an hour's access?
- If there is a working lunch for professional development that is necessary and reasonable, does it include an agenda and sign-in sheet?
  - The agenda must state this is a working lunch and it must be critical to the overall agenda as part of a substantive discussion or active work.
  - Is there a genuine time constraint to get lunch due to the topic-packed agenda?
- Does the grant allow it?
- Is the lunch cost reasonable?
- Has the LEA carefully documented that any food is reasonable and necessary?

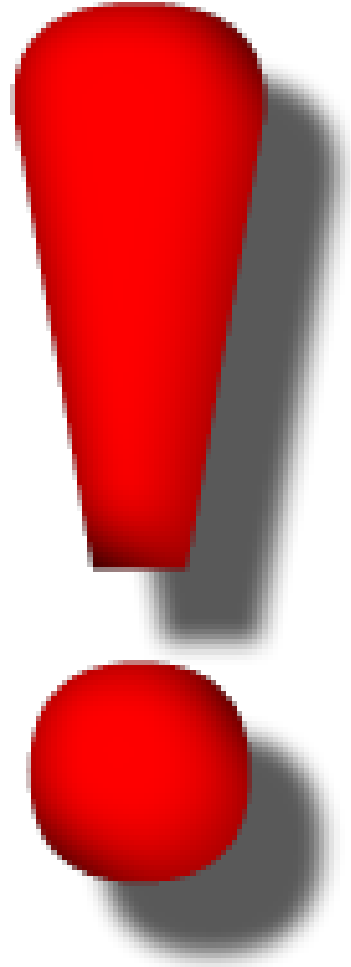
# Questionable Uses of Funds – Food cont...



- Food for social activities are not allowable:
  - Staff holiday parties
  - Staff incentives
  - Thanksgiving dinner
  - Retirement parties
  - Birthday parties
  - School year beginning/ending



# Updates and Information



# GRA Requests



- July 11 drawdown
- Require expenditure reports or detail ledger reports
- All Title and ESSER grants
- To review for compliance, allowability, period of performance, and accuracy pursuant to 2 CFR 200.403 & 200.332(a)(3)

- Updated schedule posted on ESSER Monitoring page
- Inventory CFR 2 § 200.313(d)
- Time and Effort CFR 2 § 200.430
  - Any employee funded by federal grants must maintain documentation showing their time is allocable to a federal program

# State Insurance Buy-In



- Legislation approved amendment to House Bill 203
- Now no cap on the one-time buy-in amount
- July you can request the entire buy-in amount, or the partial amount that wasn't previously covered
- Submit paperwork to OGI
- ESSER- return amount after July payment, funds to be redistributed back to LEA

# Resources



Here are some great resources:

[Allowable Use of Federal Funds Manual](#)

[USED ESSER Use of Funds FAQs](#)



# Contact



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