# **Expenditures of Title III Funds by Required Use and Object Code**

The required uses of Title III funds are developing effective: 1) Language Instruction Educational Programs (LIEPs); 2) professional development activities; and 3) parent, family, and community engagement. Costs resulting from these required activities must be **supplemental** to state and locally funded programs and services school divisions provide to meet ESSA requirements and the federal civil rights obligations for EL education.

Additionally, Title III funds spent must be allocable, reasonable, and allowable.  A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. A cost is allocable to a cost objective if the goods or services involved are chargeable or assignable to the cost objective in accordance with the relative benefits received. Finally, a cost is allowable if it is necessary and reasonable for proper and efficient performance of the award and allocable to the award.

**Title III Carryover**

Under the federal Tydings Amendment, Section 421(B) of the General Education Provisions Act, 20 U.S.C. 1225(b), Title III funds are awarded to the subgrantee for use within a 27-month grant period. School divisions have a maximum of 15 months to expend and obligate current-year funds from as early as July 1 of any federal fiscal year through September 30th of the subsequent year, or the funds will be reallocated. School divisions have an additional 12-month carryover period extending from October 1 through September 30 of the succeeding fiscal year. Funds not obligated within the Tydings period of the 12 months must be returned through the Virginia Department of Education Department to the U.S. Department of Education (Tydings Amendment of General Education Provisions Act, Section 76.709 of Education Department General Administrative Regulations).

This document is not all inclusive and is, therefore, subject to revision. Questions about the allowability of Title III expenditures should be directed to the assigned VDOE Title III team member.

# **VDOE Title III Team**

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| --- | --- | --- | --- | --- |
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# **Purposes of Title III, Part A**

**The purpose of Title III, Part A, is to help ensure that English learners (ELs), including immigrant children and youth, attain English language proficiency and meet the same standards that all children are expected to meet.**

(Section 3102 of the ESEA, as amended by ESSA)

**Title III Supplement, Not Supplant, Provisions**

Title III has its own provisions prohibiting supplanting of other federal, state, and local funds. Title III funds cannot be used to fulfill:

* local or state educational mandates
* requirements under federal programs other than Title III to include Title I
* the federal civil rights requirements for EL education

**Questions for Consideration to Determine Allowability**

* What instructional programs and services are provided to all students using funds other than Title III?
* What programs and services are in place to meet federal civil rights for EL education requirements under:
* Title VI of the Civil Rights Act of 1964
* Equal Educational Opportunities Act (EEOA) (1974)
* *Lau v. Nichols* Supreme Court decision (1974)
* *Castañeda v. Pickard* Supreme Court decision (1981)
* What services is the division required to provide by other federal, state, and local laws or regulations?
* Was the program/service previously provided with federal, state, and/or local funds?

# **Required Uses of Title III, Part A**

1. **To increase the English language proficiency of English Learners by providing effective Language Instruction Educational Programs (LIEPs) (3) To provide other effective activities and strategies that enhance or supplement LIEPs for ELs, which must include parent, family, and community engagement activities, and may include strategies that serve to coordinate and align related programs.**

*Note: LIEP services are part of the core curriculum for ELs. Therefore, Title III funding cannot be used to support core LIEP services to include staffing and materials unless it is supplemental to local funding. Title III funds cannot be used to promote*

*the acquisition of languages other than English.*

1. **To provide effective professional development (PD) to classroom teachers, principals and other school leaders,**

**administrators, and other school or community-based organizational personnel.**

*Note: Professional development should be supported by evidence-based research as effective in increasing students' English proficiency, and of sufficient intensity and duration to have a positive and lasting impact on the teacher's performance in the classroom (not a one-time offering, but part of a comprehensive, ongoing plan of development).*

1. **To provide other effective activities and strategies that enhance or supplement LIEPs for ELs, which must include parent,**

**family, and community engagement activities, and may include strategies that serve to coordinate and align related programs.**

*Note: Divisions are required to provide engagement activities to the parents and families of ELs in a language they can*

*understand. Childcare expenses related to LEP parent and family engagement are not allowable Title III costs.*

# **Object Code 1000 – Personnel Services**

# **LIEP Services**

Staffing/Salaries to Provide:

* Administrative and clerical support to manage Title III programs and services within the 2 percent administrative cap to include indirect costs
* Language instruction to ELs during school hours, after school hours, or in summer that is supplemental to the daily or weekly locally-funded LIEP services ELs receive as part of the core curriculum
* Services to ELs that are not the same as those in other locally or state-funded programs or programs that meet other federal requirements beyond Title III
* Stipends for staff interpretation and translation services outside contracted hours specifically for EL programs or Title III-funded services
* Preschool LIEP services for ELs coordinated with other relevant programs
* Career and technical education (CTE) programs specifically designed for ELs
* Early college high school or dual or concurrent enrollment programs or courses specifically designed to help ELs achieve success in postsecondary education
* Tutoring specifically for ELs (which may include materials in a language that the student can understand, interpreters, and translators)
* Stipends for teachers, instructional specialists, and/or administrators to upgrade:
* EL program goals and/or objectives
  + Effective Instructional strategies for ELs
  + Curricula, lesson plans, or units of EL instruction

# **Professional Development**

* Staff participation in PD specifically related to improving the academic achievement of ELs. Examples of such activities are:
* In-service trainings or workshops
* Coaching or mentoring services for teachers of ELs
* Data analysis to improve EL services and inform instructional practices for ELs

# **LEP Parent and Family Engagement**

Staffing/Salaries to Provide:

* Bilingual liaisons to connect with ELs and their families on a socio-emotional level and to provide information and answer questions on the LIEP
* Engagement and outreach activities so that LEP parents and families can participate in their student’s education
* Information to LEP parents and families that is specific to EL or Title III-funded programs and services
* Interpretation and translation services specifically for LEP parent and family outreach and engagement

# **Expenditures not allowable under Object Code 1000**

# **LIEP Services**

* Salaries for teachers providing direct LIEP services to ELs as part of the core curriculum
* Class size reduction
* Salaries/stipends for staff to provide the following programs and services to the general student population (to include ELs):
* tutorials or intensified instruction
* remediation or credit recovery programs
* CTE programs
* early college high school or dual or concurrent enrollment programs or courses
* interpretation and translation services
* Salaries for staff providing instruction in languages other than English (such as heritage language classes or foreign language classes for educators)
* Administrative/clerical support for Title III-funded programs and services exceeding the 2 percent cap

# **Professional Development**

* Staff salaries/stipends for participating in PD that is related to improving the academic achievement of all students including ELs
* Staff salaries/stipends for participating in PD that is within school contract hours

# **LEP Parent and Family Engagement**

* Salaries/stipends for staff to provide programs and services that are not specific to LEP parents and families
* Salaries/stipends for staff to provide interpretation/translation services to provide general school or division information, or programs and services intended for all parents within a school division

# **Object Code 2000 – Employee Benefits**

Job related benefits provided to employees as part of their total compensation. Fringe benefits include the employer’s portion of FICA, pensions, insurance (life, health, disability income, etc.) and employee allowances. Benefits must be connected to personnel services in OC1000.

# **Object Code 3000 – Purchases/Contracted Services (not payroll)**

# **LIEP Services**

Contracted services for:

* Supplemental tutoring to ELs to improve English proficiency for increased academic achievement provided through a contracted agency
* Career and technical education (CTE) programs specifically designed for ELs
* Early college high school or dual or concurrent enrollment programs or courses specifically designed to help ELs achieve success in postsecondary education
* Interpretation/translation services for EL programs or Title III-funded services
* Field trips costs for afterschool or summer programs to support the English language development of ELs
* Maintenance/leases for equipment specifically used by Title III to administer EL programs and services

# **Professional Development**

**Contracted services for:**

* Professional development activities specifically intended to improve EL academic achievement
* Data analysis to improve EL services and inform instructional practices for ELs
* Conference registrations, lodging, meals, and travel costs that are paid directly to the vendor for PD specifically intended to improve EL academic achievement
* Coursework, print or online subscriptions, or onsite licenses to enhance teacher efficacy in implementing instructional strategies to improve EL academic achievement (paid to vendor). Subscriptions/site licenses must be school or division-based, not for individuals.
* Praxis preparation coursework/materials
* Food and venue costs for PD that is specific to improving EL academic achievement (paid to vendor). The PD: 1) must be at minimum a full-day event; and 2) provides no reasonable opportunity for participants to purchase their own food during the activity. The costs must also be reasonable and allocable.

# **LEP Parent and Family Engagement**

**Contracted services for:**

* LEP parent and family engagement activities
* Food or snacks including a reasonable tip for delivery (the food costs must be reasonable and allocable)
* Travel expenses for LEP parents and families to attend school events or engagement activities that are specifically designed for them
* Contracted telephone or digital language services (such as Language Line) to provide language assistance to LEP parents and families for Title III-specific information or LEP parent and family engagement
* Maintenance/leases for equipment used for programs and services specifically designed for LEP parents and families (such as a parent resource center or an adult ESL program)
* Transportation costs outsourced to an outside vendor for field trips specifically designed for LEP parents and families (not school buses)
* Printing costs outsourced to an outside vendor for fliers, handouts, newsletters, or other materials specifically for LEP parent and family engagement
* Food and venue costs outsourced to an outside vendor for LEP parent and family engagement activities (the costs must be reasonable and allocable)

# **Expenditures not allowable under Object Code 3000**

# **LIEP Services**

* Contracted services to provide programs or activities for all students including ELs
* Contracted food services for student programs and activities within the school day (both EL and non-EL students)
* Field trip costs for ELs for the purpose of entertainment, amusement, or social activities
* Maintenance/leases for equipment used for programs and services for the general student population
* Individual memberships to professional organizations or individual print or online subscriptions

# **Professional Development**

* Contracted services for PD that is not specifically focused on improving EL academic achievement
* Costs for taking the Praxis exam such as registration fees (costs for preparation coursework/materials are allowable)
* Food and venue costs for PD that is focused on improving educational outcomes for all students including ELs
* Contracted trainings that are required by the school division or that are state mandated trainings

# **LEP Parent and Family Engagement**

* Contracted services for programs for general parent and family engagement activities including LEP parents and families
* Contracted telephone or digital language services to provide interpretation or translation of information that is also called to the attention of non-LEP parents and families or for programs for all parents in a school or division including the parents of ELs
* Travel expenses for LEP parents and families to attend general school activities or events open to all students
* Maintenance/leases for equipment used for programs and services for all parents and families including LEP parents and families
* Transportation costs for field trips that also includes non-LEP parents and families
* Printing costs for fliers, handouts, newsletters, or other materials for general parent and family engagement including LEP parents and families

# **Object Code 4000 – Internal Services**

# **LIEP Services**

In-house services that specifically support Title III or EL programs and services:

* Printing and mailing charges (for Title III-required documents)
* Transportation costs for field trips for afterschool or summer programs to support English language development for ELs

# **Professional Development**

In-house services that specifically support PD specifically focused on improving EL academic achievement such as:

* Printing or binding charges
* Food prepared by a school division food services (if there is no reasonable opportunity for participants to purchase their own food during the PD activity)
* Custodial services
* Transportation costs for teachers to attend a PD activity

# **LEP Parent and Family Engagement**

* Printing and mailing costs for fliers, handouts, newsletters, or other materials for LEP parent and family engagement
* Food prepared by a school division’s food services if there is no reasonable opportunity for participants to purchase their own food during the engagement activity
* Transportation costs for field trips specifically designed for LEP parents and families

# **Expenditures not allowable under Object Code 4000**

# **LIEP Services**

In-house services that specifically support Title III or EL programs and services:

* Printing and mailing charges (for Title III-required documents)
* Transportation costs for field trips for afterschool or summer programs to support English language development for ELs (school buses)

# **Professional Development**

In-house services that support PD specifically focused on improving EL academic achievement such as:

* Printing or binding charges
* Food prepared by school division food services (if there is no reasonable opportunity for participants to purchase their own food during the activity)
* Custodial services specific to the PD activity

# **LEP Parent and Family Engagement**

In-house services that support engagement activities specifically for LEP parents and families such as:

* Printing and mailing costs for fliers, handouts, newsletters, or other materials
* Food prepared by school division food services (if there is no reasonable opportunity for participants to purchase their own food during the activity)
* Transportation costs for field trips (school buses)

# **Object Code 5000 – Other Charges**

# **LIEP Services**

* Indirect costs associated with Title III program administration at restricted rates. Indirect costs are part of the 2 percent cap under Title III

# Individual reimbursement for travel expenses for home visits to students

# **Professional Development**

**Individual reimbursements for:**

* Conference registrations, lodging, meals, and travel costs for PD specifically intended to improve EL academic achievement
* Coursework, print or online subscriptions, or onsite licenses to enhance teacher efficacy in implementing instructional strategies to improve EL academic achievement (subscriptions must be school or division-based, not for individuals)
* Praxis preparation coursework/materials to obtain the ESL endorsement

# **LEP Parent and Family Engagement**

**Individual reimbursements for:**

* Travel expenses for home visits to students
* Travel expenses related to LEP parent and family engagement activities

# **Expenditures not allowable under Object Code 5000**

# **LIEP Services**

* Individual memberships to professional organizations or individual print or online subscriptions
* Costs of activities for ELs with the purpose of entertainment, amusement, or social activities, and any costs directly related to these activities such as tickets, meals, lodging, rentals, transportation and gratuities
* Cost of mileage for itinerant EL teacher between schools

# **Professional Development**

* Individual memberships or subscriptions
* Participant reimbursement for PD-related costs not specifically focused on improving EL academic achievement

# **LEP Parent and Family Engagement**

* Costs of activities for LEP parents and families with the purpose of entertainment, amusement, diversion or social activities, and any costs directly related to these activities such as tickets, meals, lodging, rentals, transportation and gratuities.

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

# **(All purchases must be reasonable and necessary)**

# **LIEP Services**

Technology, equipment, training materials, student materials, and supplies for administrative or instructional purposes. Expenditures **must** supplement locally funded purchases that are necessary for 1) EL program operation; or 2) to deliver core language acquisition instruction for ELs. Examples of allowable materials and supplies may include:

* Instructional materials
* Paper, pens, pencils, markers, notebooks, and other such supplies
* Books for EL resource libraries
* Toner/Computers/Laptops/iPads/Chromebooks
* Computer or Chromebook carts
* Software
* Earphones/Headsets to access instructional software for ELs
* Flash drives
* Furniture specifically to store materials for EL or Title III programs and services.

# **Professional Development**

The following can be purchased for PD specifically focused on improving EL academic achievement using Title III funds:

* Materials and supplies
* Books and other materials for professional learning community (PLC) activities
* E-books and software
* Food items from a grocery store, Walmart, or similar store (if there is no reasonable opportunity for participants to purchase their own food during the PD activity).
* Items under $10 (per item) that are reasonably necessary to achieve the educational goals of the PD activity (for example: tote bags to carry books/materials provided by the school division during the PD activity)

# **LEP Parent and Family Engagement**

Technology, equipment, training materials, and supplies for LEP parent and family engagement purposes such as LEP parent nights, LEP parent resource centers, workshops for LEP parent and families, and/or adult ESL classes. The costs much be reasonable, allocable and in keeping with Title III purposes. Examples of allowable materials and supplies may include:

* Instructional materials
* Paper, pens, pencils, markers, notebooks, and other such supplies
* Books for parent resource libraries
* Toner/Computers/Laptops/iPads/Chromebooks
* Computer or Chromebook carts
* Software
* Earphones/Headsets
* Flash drives
* Furniture (such as chairs or tables) specifically for LEP parent and family engagement activities. Furniture purchases cannot also be made available for general education programs and services.
* Incentives or awards under $10 (per item)
* Food items from a grocery store, Walmart, or similar store (if there is no reasonable opportunity for participants to purchase their own food during the engagement activity). The food costs must be reasonable and allocable.

# **Expenditures not allowable under Object Code 6000**

# **LIEP Services**

* Materials/supplies for programs or activities for the general student population including ELs
* Materials/supplies to support entertainment activities or social activities, or activities not directly linked to EL academic achievement
* Cash awards or prepaid gift/cash cards such as Amazon, I-tunes, Walmart, convenience stores, etc. for student activities
* Food costs for student activities (for EL and non-EL students)
* Furniture for classrooms or office spaces, or for general educational programs and services

# **Professional Development**

* Books, software, supplies, or food items used for PD that is not specifically focused on improving EL education
* Incentives or awards exceeding $10 (per item)
* Items that are not reasonably necessary to achieve the educational goals of the PD activity (for example: T-shirts, incentives/awards/prizes, or decorations)

# **LEP Parent and Family Engagement**

* Incentives or awards exceeding $10 (per item)
* Materials or supplies for general parent and family engagement including LEP parents and families
* Costs of LEP parent and family engagement with the purpose of entertainment, amusement, or social activities that is not related to the academic improvement of ELs, as well as any costs directly related to these activities such as tickets, meals, lodging, rentals, transportation, and gratuities

# **Object Code 8000 – Capital Outlay**

* Technology purchases necessary for Title III program administration that exceeds $5,000 per item or exceeds the school division’s locally-determined threshold to classify equipment purchases. Capital outlay purchases to support the basic operation of a school are not allowable. Capital outlay does not include the purchase of equipment costing less than $5,000 unless the school division sets a lower capitalization threshold.