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A3. If an LEA transferred 100% of their Title II, Part A funds through the funding transferability option or REAP, they will not be in the pool of LEAs subject to random validation for Title II, Part A. However, if the LEA transferred less than 100% of their funds out of Title II, Part A, they are subject to random validation because they are required to meet all Title II, Part A requirements since they chose to keep a portion of their Title II, Part A funds.

Q4. If an LEA joined a Shared Services Arrangement (SSA) for Title II, Part A, will they be selected for a random validation?

A4. If an LEA joined a Shared Services Arrangement for Title II, Part A, they are still required to meet all the program requirements associated with Title II, Part A. Thus, the LEA will be in the pool of LEAs subject to random validation for Title II, Part A. Based on the agreement between the SSA and LEA, the SSA may be required to submit the documentation required for random validation.

*Q5: On the PS3104, Part 1, Section C: When it comes to other allowable activities such as improving the capacity of campus leaders to coach teachers, should that statement be removed as it could potentially fall under option 2 ^ W Œ } (• •] } À v o } ‰ u v š l µ š } Œ ' Œ } Á š Z _ M

A5: Because Title II, Part A runs into the 3 areas of focus, it might be best to stick to those areas. Make the LEA aware that such documentation should be kept locally and readily available upon request.

*Q6: On the Program Compliance Self- Z l / š u î U] š • š š • š Z š ^ d Z > } } Œ] v Title II, Part A with other related strategies, programs, and activities being conducted in the } u u µ v] š Ç _ X / (š Z > } • } } Œ] v š Á] š Z } u u µ v] š Ç } Œ P v] Ì š] (µ v • } v š Z š] À] š Ç U v š Z Ç • š] o o v • Á Œ ^ z • _ š } š Z] • } u ‰ district coordinates with its local Child Advocacy Center and has them come in and do a supplemental professional development regarding signs to watch for in their students to identify possible child abuse, but the services provided by the Child Advocacy Center are free, would they • š] o o o š } Z l ^ z • _ } v š Z] • } u ‰ o] v ‹ µ • š] } v } Œ ^ E } X _

A6: The main thing here is that the LEA is coordinating their activities with community organizations. In which case they would answer yes. If such activity does not use Title II, Part A funds but it is part of the LEA professional development program, then this activity will meet this compliance item. Recommended documentation would encompass the coordination with the organization as well as documentation showcasing that such professional development is free of charge and part of the Title II, Part A Professional Development Plan.

*Q7: I have an LEA that self-

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highest percentages of low-income students. If the LEA has no campuses in school improvement, or can document that the professional development needs and teacher recruitment/retention needs of those campuses are met through the School Improvement grant, then the LEA may focus its Title II, Part A program on meeting other identified needs

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A3. If Title II, Part A funds are used at the campus level, the activity could be included in the Campus Improvement Plan and provided as supporting documentation to establish compliance.

Q4. Where in statute is a comprehensive needs assessment and district improvement plan referenced for Title II, Part A purposes?

A4. Historically, LEAs were required to conduct a needs assessment to engage key stakeholders under section 2122(c) of the ESEA, as amended by NCLB. While Title II, Part A of the amended ESEA, as amended by the ESSA, does not require the same formal needs assessment (although a needs assessment is required under other sections of ESEA), such an assessment may help ensure that Title II, Part A funds are used strategically, to maximize educator effectiveness and student outcomes. (Source: United States Department of Education Non-Regulatory Guidance for Title II, Part A: Building Systems of Support for Excellent Teaching and Leading (September 27, 2016)). The professional are an integral part of broad schoolwide and districtwide educational improve compliance can be documented via improvement plans is that they are documents that are universally implemented across LEAs. Additionally, this provides LEAs the opportunity to include the Title II, Part A required information in a plan that is already developed rather than having to develop another document to establish compliance.

Q5. Does each specific training/PD session need to be stated in the CNA/CIP or can it be more general?

A5. The level of specificity to be included in the comprehensive needs assessment and campus improvement plan related to specific training and professional development activities is a local decision as long as the LEA is able to provide documentation that establishes compliance. LEAs are strongly recommended not to include vendor names and/or vendor-specific products. Instead, LEAs can include a general description of the service/activity.

Consultation

Q1: What stakeholders are required in order for LEAs to meet the Title II, Part A consultation requirement?

A1: ESSA, Section 2102(b)(3)(A), requires LEAs to meaningfully consult with the following nine groups of stakeholders as they plan for, implement, and eval /F5 tc-3(v9hBgo(I)-2(,)8d)-2(er)7(G [(Tit)-4(l)10(e

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- Charter school leaders (in an independent school district (ISD) that has district charter schools)
- Parents
- Community partners
- Other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of Title II, Part A

sistant principal, or other individual who is:

1. an employee or officer of an elementary school or secondary school, local educational

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Additionally, to meet the stakeholder group requirement of other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of Title II, Part, an LEA may choose to seek advice from their Education Service Center (ESC) federal meet the purpose of Title II, Part A by attending ESC offered Title II, Part A meetings and/or training opportunities. In turn, the LEA may use the data obtained to continually update and improve their Title II, Part A activities. The LEA would need to retain documentation showing the process and results associated with the advice sought.

Q12: For Title II, Part A program requirement documentation, could a survey take the place of a consultation meeting, or is a meeting required?

A12: Best practice would be to consider surveys as a tool that the LEA can use as part of its consultation process. For example, an LEA may choose to seek advice from teachers regarding how best to

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partnerships with outside organizations, or addressing school conditions for learning such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism.

Other activities include community partner involvement in the meaningful consultation process of specific professional development opportunities (i.e. mental health, safety, health, nutrition, etc.).

Parent and Family Engagement

Q1. How and in what context would it be allowable to use Title II, Part A funds to provide training to parents?

A1. The intent and purpose of Title II focuses on professional development for teachers, principals and other school leaders. Although Title II, Part A does support parent engagement in various ways, it could be difficult to document that providing training to parents directly would align with the intent and purpose of Title II, Part A. You may consider inviting parents to a Title II, Part A professional development opportunity provided to teachers, principals and/or other school leaders in which the LEA has paid a set amount for the training rather than a per participant cost and ensure that by including parents it does not have an adverse effect on the training received by the teachers, principals and/or other school leaders.

Parent engagement in Title II, Part A would be allowable in the following ways. For example, parents are required stakeholders in the meaningful consultation and planning processes associated with the use of Title II, Part A funds. Additionally, Title II, Part A funds could be used to provide professional development to teachers, principals and other school leaders aimed at strategies for engaging parents, families, and community partners if the professional development meets the ESSA definition of professional development. Although funds used to pay for professional development activities associated with parent engagement or involvement strategies are considered allowable under Title II, Part A, there are several steps and requirements for using Title II, Part A funds. Parent engagement under Title II, Part A is only one part of the required steps. Please reference the Use of Funds section of Title II, Part A Program Guidance for additional information.

Prioritization of Funds

Q1: If the LEA has never done Title I, Part A in previous years, would we have to show prioritization of funds for Title II, Part A?

A1: If the LEA has not participated in Title I, Part A, the LEA would not be involved in the Title I School Improvement grant; therefore, that piece of the prioritization of funds requirement would not be applicable. However, all campuses would have a school income percentage, which is what the second

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part of the prioritization of funds requirement refers to. The LEA should prioritize the campuses with the highest percentages of low-income students when planning for its Title II, Part A program.

Q2: What is the best way to document that the LEA is meeting the Prioritization of Funds requirement?

A2: The most straightforward way is for the LEA to include a written description in its District Improvement Plan, indicating how it considered the School Improvement status and low-income percentages in its prioritization. A chart showing each campus, its School Improvement status (yes/no), Low-income %, and amount of Title II, Part A funds would be helpful. If a campus is receiving supplemental funding from School Improvement (or other supplemental fund source) that meets all its Title II-related needs, the LEA could indicate that in the chart and in its rationale for prioritizing Title II, Part A funds to other campuses.

Professional Development

Q1: What is a good way to keep track of professional development when teachers attend out-of-district training?

A1: One possibility is to collect copies of completion certificates from teachers who attend out-of-district training. This is a district decision, however, and should follow district procedures.

Q2: Can we pay to send district administrators to professional development using Title II, Part A?

A2: The intended beneficiaries of the Title II, Part A program are teachers, principals, and other school leaders. A school leader is a principal, assistant principal, or other individual who is:

1. an employee or officer of an elementary school or secondary school, local educational agency, or other entity operating an elementary school or secondary school; AND
2. responsible for the daily instructional leadership and managerial operations in the elementary school or secondary school building.

In order for an LEA to send a district administrator to professional development using Title II, Part A funds, the LEA would need to document how such an expenditure meets the intent and purpose of Title II, Part A.

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school training that occurs during in-service so that teachers will not be so overwhelmed with information.

The LEA plans to provide their teachers with stipends to attend that week since it is outside of their contract days and will also have to pay for some of the PD as well. Assuming the PD meets the criteria of T2A, would these be allowable costs for Title 2?

A6: It would be allowable to plan for Title II, Part A to cover some type of PD that the LEA wants to continue on an annual basis. However, they would need to be sure that none of the PD that Title II is paying for is to meet a state requirement. Any PD provided with Title II, Part A funds must be supplemental.

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requirements in this linked document, a mentor program is not required, but if the district decides to have a mentor program, then the mentor training is a state-required training. That would mean that Title II could not be used for the training required for the mentors. Is that correct?

A13: You are correct. If the LEA chooses to implement the program, the training is mandatory; therefore, Title II, Part A funds could not be used for the training required for this program. However, there is additional mentor training that is above and beyond the required training, and the LEA can document that the required training was provided with state or local (or ESSER) funds, then Title II, Part A could provide the additional training.

Q14: Does it affect the ability to pay for a PD if a district requires teachers to attend three trainings in the summer but does not specify what kind? For instance, if a teacher is required to attend three days and attends a supplemental STEM conference for three days (that meets PD definition). Would that impact the district being able to fund the conference out of Title II?

A14: Please keep in mind that the training topic to be provided needs to be supplemental to state requirements and meets the ESSA definition of professional development. If those criteria are met, the training would be considered a valid use of the Title II, Part A funds. If the professional development is required by state law or by local policy, then using Title II, Part A funds to pay for the training would be a supplant. Refer to question 1T Q d Tm ( )-3 442.75 Tm 0 g 0 G [(Re)11(f)-4(er)-2

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supplanting, as well as not meeting the intent and purpose of the program. Because of this, it is not a use of funds that is recommended.

Q8: We were granted the Mentor Allotment last year and were able to pay for mentor stipends. This year, we were not granted the allotment, so may we go back to paying the stipends with Title II funds as in previous years?

A8: This would be an example of where the LEA would want to keep documentation showing that the state fund source that had been used is no longer available. (This could be minutes from a board meeting, or from a budget report.) This would be what an auditor would want to see in order for the LEA to successfully rebut the presumption of supplanting.

Q9: We have been paying a teacher out of Title II for class size reduction, but it does not truly satisfy that requirement so I will be moving it back into the local budget but would need to move some of the locally paid mentor stipends to Title II. We may have to look at doing away with some of our stipends if I cannot do this. What can I do?

A9: The answer to this depends on whether the LEA can rebut the presumption of supplanting. If the LEA can document that the stipends will end because of budget reductions, the LEA can rebut the presumption of supplanting. However, the LEA must be careful not to plan to use Title II, Part A funds for the stipends so that the state/local funds that were previously used for stipends are available for use elsewhere. That would be seen by auditors as a supplant. It all comes down to the documentation.

*Q10: I have a district that utilizes Title IV, Part A funds for materials/resources utilized in Makerspace (STEM) classes. The > [student-to-teacher ratio is very high (40:1) for those

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Use of Funds

Q1. Can Title II, Part A funds be used to provide teachers with stipends to attend professional development outside of their work schedule (for example, after hours, during the summer or on weekends)?

A1. It depends. LEAs must determine that the professional development meets the requirements noted in the ESSA definition for professional development. Additionally, LEAs should refer to the Use of Funds section of the Title II, Part A Program Guide to ensure that all use-of-funds criteria are met.

Q2. Can Title II, Part A funds be used to provide new teachers with stipends to attend new teacher orientation which is considered outside of their contracted workdays?

A2. It depends. New teacher orientations are known for providing general information about campus/LEA policies and procedures and in part do not focus on improving student academic

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Q9. Can an LEA use Title II, Part A funds to pay for materials and supplies used for implementing collaborative educator work?

A9. It depends. Although funds used to pay for materials and supplies that are 100% dedicated for implementing collaborative educator work are considered allowable under Title II, Part A, there are several steps and requirements for using Title II, Part A funds. This FAQ addresses only one part of the required steps. Please reference the Use of Funds section of the Title II, Part A Program Guide.

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A18. The intent of Title II, Part A funding is to support educators in their work to improve the overall quality of instruction and ensure equity of educational opportunity for all students. Since the Instructional Officer in this scenario seems to be disconnected from working directly with educators, this would conflict with the intent and be hard to justify that it meets the Title II, Part A use of funds steps and requirements referenced in the Use of Funds section of the Title II, Part A Program Guide.

However, if the Instructional Officer is a Principal Supervisor, the Title II, Part A Non-Regulatory Guidance for Principals and other school leaders, SEAs and LEAs may use Title II, Part A funds to improve the effectiveness of principals, assistant principals, and other school leaders, which includes an employees or officers of an elementary or secondary school, LEA, or o
for the daily instructional leadership and managerial operations in the elementary school or

responsible for the daily instructional leadership and managerial operations in the elementary

acknowledges the importance of school leaders who are actively responsible for suc
instruction and management in the school. This means that the ESEA considers those LEA staff, such

to also be eligible for Title II, Part A funded support. (ESEA section 8101(44)). We encourage SEAs and LEAs to extend Title II, Part A-funded services to these principal supervisors to the extent that those individuals actively and frequently take responsibility for helping principals with instructional

Q19. Can funds be used for a math coach to provide instructional coaching to teachers?

A19. The intent of Title II, Part A funding is to support educators in their work to improve the overall quality of instruction and ensure equity of educational opportunity for all students. Since a math coach in this scenario seems to be connected to working directly with educators, this would be aligned with the intent of Title II, Part A. Although funds used to pay for other school leaders supporting educator professional development and growth are considered allowable under Title II, Part A, there are several steps and re

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Q21. For a STEM-focused professional development activity, is it a Title II, Part A allowable expense to procure supplies, consultants, etc. as related to the activity?

A21. Although funds used to pay for supplies and materials and/or contracted services related to Title II, Part A professional development activities are considered allowable under Title II, Part A, there are several steps and requirements
only one part of the required steps. Please reference the Use of Funds section of the Title II, Part A Program Guide for the steps required to determine whether an LEA can use Title II, Part A funds for a particular expense.

Q22. Can an LEA use Title II, Part A funds to pay for the salary of an Assistant Principal?

A22. Use of Title II, Part A funds for the salary of an Assistant Principal generally would not meet the intent and purpose of Title II, Part A

Q23: One of my districts wants to know if they can pay for the ESC Distance Learning Fee Service with Title II funds. Would this be an allowable use of funds?

A23: The LEA would have to be able to document that this is a 2 0 612 .e1(e)3t- 76.584 4ef 76.584 4ef 7

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Q28: Are Title II, Part A funds restricted to core content areas?

A28: art A under ESSA. An LEA could institute a local practice, such as to focus on STEM subjects, but there is not a core content restriction in statute or guidance.

Q29: Would it be an allowable use of funds to have Title II, Part A funds pay the salary of Assistant Superintendent who supervises principals?

A29: The LEA would have to be very careful to avoid a supplant here. If this is an existing position that has been paid with state/local funds, it would be a supplant to start paying it with Title II, Part A funds. Even if it is a new position, the job duties could also be problematic. Any general administrative duties for the LEA as a whole would likely be outside the intent and purpose of the Title II, Part A program. Coaching teachers and principals could be seen as allowable, but perhaps not normal supervisory duties.

Q30: Can Title II, Part A funding be used to pay tuition for aides going through a teacher certification program?

A30: It could be possible for this to be an allowable activity with Title II, Part A funds. However, each LEA would need to make its own determination as to whether the activity would be supplemental, as

Q31: Can you provide more specificity to evaluation and support systems? Is this evaluation of LEA programs? What do you mean by Support Systems?

A31: There is a bit more detail in the Title II, Part A program guidance on pp. 10-11: "ESSA supports the development or improvement of a rigorous, transparent, and fair evaluation and support system for teachers, principals, or other school leaders that is based on evidence of student achievement and may include student growth. It should also include multiple measures of educator performance and provide clear, timely, and useful feedback to teachers, principals, or other school leaders."

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Q33: Can Title II, Part A split-fund costs with Title I since Title funds can only cover the cost of Title I schools? For example, substitutes for training or programs that are evidence based?

A33: It would not be a supplanting issue for Title II, Part A funds to replace Title I, Part A funds (or vice versa) because those statutes only require the federal funds to supplement state and local funds, not other federal funds. However, an LEA would want to ensure that it could document that Title II, Part A funds have been prioritized to meet the needs at campuses that have been identified for school improvement and campuses that have the highest percentage of low-income students. If Title II, Part A funds remain after that, then this could be an allowable activity if it meets LEA policies and procedures.

Q34: The purpose of Title II is to improve Educator Quality & Effectiveness which includes teachers, principals, and school leaders. Can this include Paraprofessionals too?

A34: Initiatives that provide paraprofessionals with professional growth opportunities can be allowable with Title II, Part A funds, provided the other Use of Funds considerations are met (i.e., SNS, consultation requirements, EDGAR, local policies and procedures).

Q35: Can we use Title II money to create a teacher podcast? I would need to be able to purchase the equipment needed.

A35: This could be possible; however, the LEA would need to ensure that the equipment purchased with 100% Title II, Part A funds was used only for Title II, Part A activities. If the equipment is split-funded, the LEA would have to document its proportional use among those fund sources.

Q36: Can an LEA pay stipends (time for studying and time to take the test) for teachers adding ESL certification? Can we pay for the certification test? If so, will this be under Recruit, Support, and Retain?

A36: These could be allowable activities under Title II, Part A. However, the LEA would need to consider whether any state/local funds have previously been used for this purpose. If so, there may be a supplanting issue. If such state/local funds are no longer available because of budget reductions, the LEA might be able to rebut the presumption of supplanting with appropriate documentation. The LEA would also need to ensure that these activities are in keeping with its

Q37: Can a district use Title II funds to hire a mentor/coach to provide training (according to the Professional Development definition) and support for teachers on a high-need Title I campus?

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A37: Because the mentor/coach in this case would be connected to working directly with educators, this would be aligned with the intent of Title II, Part A. The LEA would need to ensure that the other requirements in the Use of Funds guidance are met.

Q38

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Q46: Can LEAs use Title II, A funds to pay student teachers as part of their plan to recruit qualified teachers?

A46: If the LEA is doing this as part of a teacher recruitment program to attract and retain qualified teachers, then this would be an allowable activity. The LEA would want to ensure that it is complying with all the items on the Title II, Part A Use of Funds one pager.

Q47: Can LEAs use Title II, A funds to pay student teachers to complete student teaching in their district? This would be like a paid internship type position with an aide level salary.

A47: Yes, although how this is done may vary, depending on how the program is structured. The LEA could either do this through a contract with the educator certification program, or however the LEA contracts or pays non-employees. If the LEA is actually hiring the student teacher as an LEA

procedures.

Q48: d Z W Œ } P Œ u ' µ] u v š] } v • š Z š d] š o / / U W Œ š (µ v • v µ } v] š] } v and X you provide examples of what that means?

A48: The USDE has provided the following examples in its regulatory guidance:

Develop feedback mechanisms to improve working conditions, including through periodically and publicly reporting results of educator support and working conditions feedback which may leverage teacher leadership and community partners. (ESEA section 2103(b)(3)(N)).

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- Improve working conditions for teachers through high-impact activities based on local needs, such as improving access to educational technology, reducing class size to a level that is evidence-based, to the extent the State determines that such evidence is reasonably available, or providing ongoing cultural proficiency training to support stronger school climate

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*Q63: Can a paraprofessional be hired using Title II funds if they are helping support/coteach/reduce group size in the classroom to make the teacher more effective?

A63: Using Title II, Part A funds to pay paraprofessionals to provide direct services to students is not keeping with the intent and purpose of the Title II, Part A program.

*Q64: We have a district that wanted to know if it would be allowable to use Title II, Part A funds to pay for an Effective Schools Framework Diagnostic to be conducted on two of their campuses. The campuses are not in School Improvement, but the district wants to opt in voluntarily for the Diagnostics to be conducted as a proactive measure based on current performance and needs. The ESF Diagnostic would be conducted by one of the ESC departments that works with schools in this area.

A64: After looking into the ESF, it seems this would align with the intent and purpose of the T2A program as long as they are not State required activities. Please advise the LEA to maintain documentation at the local level and be readily available upon request by TEA and/or an auditor.

Q65: Are you familiar with Opportunity Culture? Could those OC stipends be paid for using Title II funds since it is teacher coaching, adding in more effective teachers in front of more kids, etc.?

A65: It would be considered allowable to provide stipends to their teachers to participate in programs such as Opportunity Culture under the realm of coaching and mentorship. That being said, please advise the LEA to go through the use of funds one pagers posted in the Title II, Part A webpage. In addition, please know that it will depend on the description (extra-duty pay, stipend, etc.), and advise the LEA to have a description of what it considers as stipends and how they are distributed.

*Q66: Can Title II, Part A funds be used for extra-duty pay to administrators (principals, assistant principals, counselors, etc.) for an allowable and supplemental professional development?

A66: In regards to extra-duty pay, please note that such costs (typically associated with code 6100) would be allowable for professional development that is not state required and that occurs outside of the regular school day/week. In terms of who may qualify for Title II, Part A funds, please note that the LEA will need to determine whether the recipients meet the definition of School Leader; page 4 of the Title II, Part A Program Guide states:

The ESSA statute refers to teachers, principals and other school leaders as intended program beneficiaries of the Title II, Part A program. For purposes of the Title II, Part A program, other

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A69:

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