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| **Allowable Expenditures of Title IIII EL Funds by Required Use and Object Code** |

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

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| **VDOE Title III Team** | | | | |
| **Name** | **Title** | **Assigned Regions** | **Email Address** | **Phone** |
| Louise Marks | Title III Coordinator |  | Louise.Marks@doe.virginia.gov | 804-225-2901 |
| Stacy Freeman | Title III Specialist | Regions 1, 2, 4, 5, 6, 7, and 8 (OMEGA) | Stacy.Freeman@doe.virginia.gov | 804-371-0778 |
| Nicki Saunders | Title III Specialist | Region 3 (OMEGA) and Title III Consortium Regions 1, 2, 3 4, 5, 6, and 7 | Nicki.Saunders@doe.virginia.gov | 804-371-0263 |
| LaShel Bradley | EL Assessment and Title III Specialist | Title III Consortium Region 8, VA Dept. of Juvenile Justice, and VA School of Deaf and Blind | LaShel.Bradley@doe.virginia.gov | 804-225-2102 |

**Stipulations for Using Title III Funds**

Federal funds made available under Title III, Part A, shall be used to supplement the level of federal, state, and local public funds that, in the absence of such availability, would have been expended for programs for ELs and IY students (ESEA Sec. 3115). Therefore, Title III funds cannot be used to fulfill local or state educational mandates, requirements under other federal programs to include Title I, or the federal civil rights obligations to educate ELs.

Prior to utilizing Title III funds, each cost must be budgeted and deemed reasonable, appropriate, and necessary. (2CFR §200 403-405)

• **Budgeted:** Is the cost clearly documented within the budget of the Title III application? Title III funds cannot be used for

expenditures not included in the school division’s approved Title III application.

• **Reasonable:** Would the cost withstand public scrutiny? Are the costs consistent with state and federal policies?

• **Appropriate:** Does the cost comply with federal program requirements and guidance and follow established policies and procedures?

• **Necessary:** Is the cost essential to carry out the intent of the program and does it meet the purpose of Title III?

Below are questions for consideration when determining the allowability of using Title III funds based on the criteria outlined above:

1. Is the use of Title III funds for this expenditure budgeted, reasonable, appropriate, and necessary?
2. In the absence of Title III funds, would the school division be required to provide these programs and services using local, state, or other federal funding?
3. What instructional programs and services are provided to all students using funds other than Title III?
4. 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)

1. Was the program/service provided in the previous school year using local, state, or other federal funds?

**Purpose of Title III Funds**

The purpose of Title III, Part A, funds is to help ensure that ELs, including IY students, attain English language proficiency and meet the same challenging state academic standards that all children are expected to meet (ESEA Sec. 3012).

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| **Title III Required Spending Categories** |
| School divisions must use Title III funds for the three spending categories below (ESEA Sec. 3115c [1-3]. However, school divisions may also use funds other than Title III to provide these programs and services to ELs. |
| **(1)**  **Providing supplemental programs and services that meet the needs of ELs and demonstrate success in increasing English language proficiency and student academic achievement.**  *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.* |
| **(2) Providing 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).* |
| **(3) Providing LEP parent, family, and community outreach and engagement activities.**  *Note: Divisions are required to provide outreach and 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.* |

**The charts below provide examples of allowable and unallowable uses of Title III funds per object code based on the three Title III required spending categories above**.

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| **Allowable Expenditures of Title III EL Funds by Object Code** | |
| **Object Code 1000**  Personnel Services | **LIEP Services**  Staffing/Salaries to Provide:   * Administrative and clerical support to manage the Title III grant. This cost is included in the 2 percent administrative cap and includes indirect costs. * Language instruction during school hours, after school hours, or in summer that is supplemental to the daily/weekly locally funded LIEP services ELs receive as part of their core curriculum. * Services for ELs that are not the same as those in local or state funded programs or programs that meet other federal requirements outside of 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. * Supplemental LIEP tutoring which may include materials in a language that the student can understand, interpreters, and/or translators. * Stipends for teachers, instructional specialists, and/or administrators to upgrade:   + EL program goals and/or objectives   + Effective instructional strategies for ELs   + EL curricula, lesson plans, or units of instruction   **Professional Development (PD)**   * Staff participation in PD specifically related to improving the academic achievement of ELs. Staff can include administrators, LIEP or content teachers, resource teachers, and student support staff. Examples of such activities can include: * In-service trainings or workshops * Coaching or mentoring services for EL educators * Data analysis to improve services and inform effective instructional practices for ELs.   **LEP Parent and Family Engagement**  Staffing/Stipends 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 school division’s LIEP services. * Staff for engagement and outreach activities and events so that LEP parents and families can meaningfully participate in their student’s education. * Staff to provide information to LEP parents and families that is specific to Title III-funded programs and services. * Interpreters/translators specifically and solely for LEP parent and family outreach and engagement. |
| **Expenditures not allowable under Object Code 1000** | |
| **Not** allowable under **Object Code 1000**  Personnel Services | **LIEP Services**   * Salaries for teachers providing direct LIEP services to ELs as part of their core curriculum. * Class size reduction initiatives. * 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 or specialized academic 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 PD that is related to improving the academic achievement of all students including ELs. * Staff salaries/stipends for participating in PD within contracted school hours.   **LEP Parent and Family Engagement**   * Salaries/stipends for staff to provide information, programs, and services 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 that is intended for all parents within a school division. |
| **Allowable Expenditures of Title III EL Funds by Object Code** | |
| **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 included in OC1000. |
| **Allowable Expenditures of Title III EL Funds by Object Code** | |
| **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 third-party agency or organization. * Specialized academic or 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. These field trips must be language-based and not for entertainment, amusement, or social purposes. * 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 effective 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 software licenses to enhance teacher efficacy in implementing instructional strategies to improve EL academic achievement (directly 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 (directly 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 budgeted, reasonable, appropriate, and necessary. Please see the guidelines below:   * Light snacks or refreshments for staff meetings or trainings lasting more than two hours.   Costs not to exceed $5 per person   * Working lunch for an all-day professional development. Activity must be at least 5   hours  **LEP Parent and Family Engagement**  **Contracted services for:**   * LEP parent and family outreach and engagement activities. * Food or snacks including a reasonable tip for delivery (the food costs must be budgeted, reasonable, appropriate, and necessary). * 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 outreach and engagement. These services cannot be used to provide information relevant to all parents including LEP parents. * 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 a third-party vendor for field trips specifically designed for LEP parents and families (not division school buses). * Printing costs outsourced to a third-party vendor for fliers, handouts, newsletters, or other materials specifically for LEP parent and family outreach and engagement. * Food and venue costs outsourced to a third-party vendor for LEP parent and family outreach and engagement activities (the costs must be budgeted, reasonable, appropriate, and necessary). |
| **Expenditures not allowable under Object Code 3000** | |
| **Not** allowable under **Object Code 3000**  Personnel Services | **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 including ELs. These field trips should be language-based and not for entertainment, amusement, or social purposes. * 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 outreach and 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. |
| **Allowable Expenditures of Title III Funds by Object Code** | |
| **Object Code 4000**  Internal Services  (Services provided by  the school division) | **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 (division school buses) |
| **Expenditures not allowable under Object Code 4000** | |
| **Not** allowable under **Object Code 4000**  Internal Services | **LIEP Services**   * Internal services for costs not related to LIEP services for ELs. * Internal services to support the basic operation of a school.   **Professional Development**   * Internal services for PD-related costs not specifically focused on improving EL academic achievement. * Internal services to support the basic operation of a school.   **LEP Parent and Family Engagement**   * Internal services not specifically focused on programs and services for LEP parents and families. * Internal services to support the basic operation of a school. |

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| **Allowable Expenditures of Title III Funds by Object Code** | |
| **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. Please see the guidelines below:   * Light snacks or refreshments for staff meetings or trainings lasting more than two hours   Costs not to exceed $5 per person   * Working lunch for an all-day professional development. Activity must be at least 5   hours   * Coursework, print or online subscriptions, or onsite software 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** | |
| **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 LIEP teacher between schools to deliver LIEP instruction as part of the core curriculum for ELs.   **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. |
| **Allowable Expenditures of Title III EL Funds by Object Code** | |
| **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 programs operation; or 2) to deliver core LIEP 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 specifically 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 budgeted, reasonable, appropriate, and necessary. 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 or engagement/outreach activities for all parents including LEP parents. The costs much be budgeted, reasonable, appropriate and necessary. * 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 costs much be budgeted, reasonable, appropriate and necessary. |
| **Expenditures not allowable under Object Code 6000** | |
| **Not** allowable under **Object Code 6000** | **LIEP Services**   * Materials/supplies for core curriculum classes including 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.