

## **Accessibility**

To the extent practicable, LEAs and schools must provide full opportunities for the participation of parents with limited English proficiency or with disabilities, including providing information and school profiles in a language and form that such parents understand.

Some ways in which a school system can promote parental participation by the parents of students with limited English proficiency are--

- (1) home visits and telephone calls by those who speak the home language;
- (2) family literacy programs that bring parents into the school community to strengthen their role in improving the education of their children;
- (3) making available to families staff proficient in multiple languages to translate any materials that are disseminated to them or the school community, and to serve as interpreters at school functions;
- (4) making available to families classes in English as a Second Language; and
- (5) preparing school notices and school newsletters in the home language, when possible.

It is important for schools and LEAs to recognize the strengths of extended family structure of some ethnic groups, to become familiar with various cultural patterns and expectations, and to keep learning from families in order to work effectively in a school-home partnership.

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### **EXAMPLE-Extended Day Parental Involvement Program with a Component for Limited English Proficient Families**

The Twilight program offered by Elk Grove Unified School District in Elk Grove, California combines Title I funds with district and Emergency Immigrant Program funds to offer an extended day program for students and their families three days a week from 4:00 to 7:00. Programs offered through Twilight under the umbrella of "Learning for the Whole Family" include preschool for four year-olds, parent workshops, adult education, and homework and tutoring for kindergarten through high school students. About 1/3 of the families attending are still learning English in five major language groups: Vietnamese, Russian, Spanish, Cantonese, and Hmong. All parents of participating students are involved in Twilight in some way such as attending parent workshops, parent-child tutoring, or volunteering in the preschool or Homework Center. Adult education classes offered at Twilight enrolled 153 parents in English, Government, and preparation for the General Equivalency Diploma. Participation of parents of Title I students has doubled as a result of the Twilight Program.

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### **Parental Information and Resource Centers**

Title IV of the Goals 2000: Educate America Act authorizes grants to nonprofit organizations alone or in consortia with LEAs to establish and fund parental information and resource centers. At these centers, training, information, and support will be provided to (a) parents of children from birth to age five; (b) parents of children enrolled in elementary and secondary schools; and (c) individuals who work with these parents. The establishment of the centers is for the purpose of increasing parents' knowledge of and confidence in child-rearing activities, such as teaching and nurturing their young children; strengthening partnerships between parents and professionals in the working relationship between home and school and meeting the educational needs of children from birth to age five; and enhancing the developmental progress of the children assisted.

Under Part A of Title I, funds can also be used to establish school- or district-based parent centers. The schools and LEAs that have Title I centers have found that home-school partnerships are strengthened, parents become more active in their children's education at home as well as at school, and the interest of families in improving their educational skills is stimulated. Parent resource centers can also be particularly effective in making parents with disabilities or limited English proficiency, who may not feel as comfortable in a classroom setting, feel more comfortable.

In States where Goals 2000 parental information and resource centers have been established, LEAs and schools receiving Part A assistance must assist parents and parent organizations

by--(1) informing them of the existence and purpose of these centers, (2) providing them with a description of the services and programs provided by the centers, (3) advising them on how to use the centers, and (4) helping them to contact the centers.

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### **Title I Parent Center--Natchez, Mississippi**

The Natchez-Adams Parent Center in the Natchez-Adams School District serves Title I students and their families. The Parent Center focuses its efforts on involving parents and families in their children's academic progress. Staff at the center have developed a set of procedures which are responsive to a child's needs when he or she is having difficulty mastering skills taught in the classroom. During a school/family conference the teacher explains the area in which the child is having difficulty and completes a "parent assistance form" (known in the district as a "green sheet"). This form indicates the skill the teacher would like the student to work on in the next six-week period (e.g., long division). The parent then takes the green sheet to the Parent Center, and staff at the Center provide materials which promote skills in the needed area. They demonstrate to the parent how to use the materials with their child. Materials, which are for home use, typically include games, manipulatives, and puzzles, and focus on activity-based learning. A follow-up form is sent to the referring teacher informing her/him of the parent's visit.

Teachers can also request that Parent Center staff conduct a home visit with parents who are not attending conferences or who are difficult to contact. The teacher completes a "yellow form" and Center staff visit the family to encourage parents to meet with the teacher and to use the resources in the Parent Center. In addition, families can check out computers and software selected to meet the specific needs of the child.

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## **Professional Development**

To enable Part A students to meet the State's challenging content and student performance standards, an LEA must provide high-quality professional development that will improve the teaching of academic subjects consistent with the State standards. In accordance with this requirement, an LEA has the option to implement professional development activities concerning ways that teachers, principals, pupil services personnel, and school administrators may work more effectively with parents. Where there are parents and families with limited English proficiency, this can include classes for teachers and school staff on subjects such as Spanish as a second language (or other appropriate languages), effective teaching strategies for LEP students, and multicultural awareness and communication.

There is also a parental participation provision set forth in section 1119(d) that permits parents to participate in Part A professional development activities if the school determines that parent participation is appropriate.

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## **STAFF DEVELOPMENT**

Several midwestern States implement Title I school improvement activities through team institutes. Home/School/Community teams, made up of principals, teachers of Title I participants, and parents of Title I participants attend week-long institutes where they are trained in specific techniques and provided with materials so that they can train staff and parents at their individual school sites. The institutes assist them in the development of strategies that improve weaknesses by building on their school's strengths. Teams return to their schools with school improvement plans ready for implementation with the rest of their staffs. Topics include communication, advocacy, family literacy, helping your child at home and gang and drug prevention.

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## **LEA Process for School Review and Improvement**

The LEA must provide for a local annual review of each Part A school, using State assessments, to determine whether the school is making adequate progress toward enabling students to meet the State's challenging student performance standards. This review will also provide the information each school needs to continually refine the program of instruction to enable children to meet the State's challenging performance standards. The LEA must publicize and disseminate the results of this review in individual school performance profiles to teachers and other staff, parents, students, and the community. [See section 1116(a)(3)]

Schools that for two consecutive years fail to meet the State's definition of adequate progress are designated as schools in need of improvement. In accordance with section 1116(c)(2)(i), these schools are required, in consultation with parents, the LEA, and, for schoolwide programs, the school support team, to revise their school plan in order to improve the performance of participating children in meeting the State's challenging student performance standards. When a State has not yet developed student performance standards, parents should be involved in deciding how to place schools in improvement.

While the LEA reviews the progress of schools, the State reviews the progress of the LEA. The State reviews annually the progress of each LEA to determine whether it is making adequate progress. The State must publicize and disseminate to LEAs, teachers and other staff, parents, students, and the community the results of the State review.

Section 1116(d)(4)(A) requires an LEA, when it has been identified by the SEA for improvement, to make revisions to its Title I plan, in consultation with schools, parents and educational experts, in ways that have the greatest likelihood of improving the performance of schools in meeting the State's student performance standards.

The involvement of parents and families in each stage of school improvement is invaluable. Continually refining a school's program of instruction to enable students to make the progress that they need requires a team effort. As research has indicated, in order to achieve maximum effectiveness, parents along with teachers must occupy center stage in such efforts.

**PROFESSIONAL DEVELOPMENT**



# PROFESSIONAL DEVELOPMENT

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## **PROFESSIONAL DEVELOPMENT**

*"The Nation's teaching force will have access to programs for the continued improvement of their professional skills and the opportunity to acquire the knowledge and skills needed to instruct and prepare all American students for the next century." (Goal 7 - National Education Goals)*

### **INTRODUCTION**

Professional development plays an essential role in successful education improvement. Professional development serves as the bridge between where prospective and experienced educators are now and where they will need to be to meet the new challenges of guiding all students in achieving to higher standards of learning and development.

Professional development is an integral component of most programs within the ESEA. The Title II--Dwight D. Eisenhower Professional Development Program, in particular, focuses exclusively on improving teaching and learning through sustained and intensive high-quality professional development activities in the core academic subjects. Title II has close links to Title I. To receive a subgrant under Title II, an LEA must conduct an assessment of its professional development needs. This assessment must be carried out with the involvement of teachers, including teachers in schools receiving assistance under Title I, Part A. It must result in a plan that describes how professional development activities will contribute to the LEA's overall efforts for school reform and educational improvement, addressing, in particular, how those activities will meet the needs of teachers in Title I schools.

Title I, Part A also has specific professional development requirements. Thus, SEAs and LEAs implementing both Title II and Title I must closely coordinate their professional development activities to ensure that teachers and staff in Title I schools, in particular, are properly equipped to help participating children achieve to high standards.

### **PROFESSIONAL DEVELOPMENT UNDER TITLE I, PART A**

#### Local responsibilities

Each LEA that receives Title I, Part A funds must provide high-quality professional development that will improve the teaching of academic subjects, consistent with the State's content standards, to enable children to meet the State's student performance standards. An LEA may satisfy this requirement through districtwide professional development activities or activities implemented by each Title I school. Regardless, professional development activities must be designed by principals, teachers, and other staff in Title I schools. Parents may also be involved in designing professional development activities.

Professional development activities under section 1119 of Title I must--

- ◆ support instructional practices that are geared to challenging State content standards and create a school environment conducive to high achievement in the academic subjects.
- ◆ support LEA Title I plans and schoolwide program plans.
- ◆ draw on resources available under other programs such as Title III of Goals 2000, Title II of ESEA, and from other sources.
- ◆ include strategies for developing curricula and teaching methods that integrate academic and vocational instruction (including applied learning and team teaching) if an LEA determines such strategies are appropriate.
- ◆ include strategies for identifying and eliminating gender and racial bias in instructional materials, methods, and practices.

An LEA must describe in its Title I plan the strategies of the LEA and its Title I schools to provide professional development. In designing professional development programs, please note:

- ◆ all school staff in schoolwide program schools may participate.
- ◆ all school staff in targeted assistance schools may participate, if such participation will result in better addressing the needs of participating students.
- ◆ knowledge of effective teaching strategies that is gained through Title I professional development activities may be shared with teaching staff who do not work with Title I participants.
- ◆ parents may participate in professional development activities if a school or LEA determines that parental participation is appropriate.

An LEA must ensure that sufficient resources are devoted to carry out professional development activities effectively in each Title I school. An LEA may reserve these resources off-the-top of the LEA's Title I allocation, each Title I school may use Title I funds it receives to provide professional development, or the LEA may use a combination of these approaches.

If a school has been identified as needing improvement under section 1116, that school must improve the skills of its staff by providing effective professional development activities as part of its school improvement plan. The school must--

- ◆ devote to professional development, over two consecutive years, an amount equivalent to at least 10 percent of the Title I, Part A funds received by the school during one fiscal year; or
- ◆ otherwise demonstrate that the school is effectively carrying out professional development activities.

In meeting this requirement, the school may use funds from any source. Principals, teachers, and other school staff must decide how to use these funds set aside for professional development activities.

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**EXAMPLE:**

**Professional Development for Title I Instruction**

The Denver Public Schools offer Title-I instruction to eligible students in preK-12. Paraprofessionals and teachers often team to provide instruction that is coordinated closely with the regular education program. They receive ongoing, indepth professional development that is job-related and site-specific. New paraprofessionals receive training on basic and advanced math skills, instructional techniques, discovery, program curriculum, standards and assessment, learning, reporting to parents, working with academic concepts and techniques, and family involvement activities.

In addition to receiving training in the computer system used in instruction, bimonthly professional development opportunities and a monthly newsletter are provided. The program manager, who coordinates a math program at the school polls teachers and paraprofessionals for common concerns and interests for future staff development. Although paraprofessionals and teachers may receive release time to attend, some sessions are offered after school.

Paraprofessionals are encouraged to take college classes and receive high quality individual training. In 637 middle and high schools, paraprofessionals run a tutoring project for students who require additional assistance in reading. Although the paraprofessionals report to the principal, they work closely with Title I and regular education teachers in the building. All tutors attend mandatory afterschool workshops for two hours each month. Based on student needs, tutors choose professional development topics, including using a diagnostic reading inventory, responding to students' writing, administering the program's four-day writing sample evaluation, and Socratic questioning.

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**EXAMPLE:**

**Migrant Head Start** (This example illustrates how professional development paid from resources other than Title I can complement a Title I preschool or early childhood program. Of course, similar professional development activities may also be funded by Title I.)

In the Dystart Unified School District in El Mirage, Arizona, a Migrant Head Start Program features three strands of training for migrant parents. Level I provides sessions on child behavior and development, with discussion of real-life examples and frustrations with child-rearing. After Level I, parents work as trained interns in the prekindergarten program or run the parent activity center. Parents in Level II serve as paraprofessionals in kindergarten. Training through Level III allows them to become paraprofessional parent trainers, known as mentors. These individuals recruit and train parents in both the preschool program's curriculum and parenting skills. The program encourages mentors to earn GEDs and other certification at the local community college, which offers Title VII education grants and has a working relationship with the program. Some mentors have received funds from the migrant program to pursue training and education. Some parent volunteers have gone on to pursue GEDs and other certifications, including higher education degrees, while others have earned their Child Development Associate certificates and are Head Start teachers.

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**EXAMPLE:****Training for teachers who work with culturally and linguistically diverse students**

Specialized training is provided in the use of the Content-Based Literacy Model (CBLM) with culturally and linguistically diverse students. Multicultural training for new teachers is designed to improve their skills in communicating and working effectively with culturally diverse students and their families. To strengthen staff focus on appropriate instructional strategies for culturally diverse students, a school-by-school half day inservice was delivered by Dearborn's curriculum specialists. Training focused on Dearborn's new direction, which has shifted from remediation to acceleration, with trainers demonstrating effective teaching strategies to accelerate learning for all students across the curriculum. In collaboration with Wayne State University in Detroit, MI, the Multifunctional Resource Center at the University of Wisconsin - Madison, and the Evaluation Assistance Center - East, on-site college courses funded by Title VII and Chapter 1 funds were offered to teachers and paraprofessionals during the school year and the summer. Courses were tailored to address the unique needs of the school system's diverse student (and family) population. Course topics include ESL/Bilingual and literacy development strategies, parent involvement techniques, and thematic instruction. This collaborative effort resulted in developing a career ladder program for paraprofessionals to enable them to pursue professional status as certified teachers, as proposed by Lyons (1993), Bliss (1991), and Sergiobanni (1994).

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**EXAMPLE: Master teacher**

In order to incorporate professional development and direct instruction into the regular school day, one district, in consultation with its principals, teachers, and parents of Title I participants, adopted the "master teacher" concept and incorporated it into all of its schoolwide program and targeted assistance schools. Given the particular needs of children in a school, a master teacher(s) assists the school's teachers to develop different lessons. In addition to giving demonstration lessons in the classroom, the master teacher coaches the teachers and participates in the design of many other professional development activities. The master teacher also provides direct instruction to groups of children.

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**EXAMPLE:**

**Effective Grades 1-6 Hands-On Instructional and Alternative Assessment--Mathematics Strategies for Preparing for the North Carolina Mathematics End-Of-Course Test. (Title II Eisenhower Math and Science Project)**

Fourteen mathematics teachers of grades 1-6 attended this year-long course, during which they familiarized themselves with strategies for teaching and assessing students' problem-solving and thinking skills. Participants were trained to become lead teachers in their school systems and were then expected to complete ten hours of peer coaching. Two of the peer coaching hours were observed by a project consultant, the project coordinators, and/or the curriculum supervisor. During the workshop the participants developed workbooks with sample lessons for each grade level (1-6) that can be used by lead teachers during peer coaching sessions. Workshop sessions stressed teaching elementary mathematics skills through the effective use of manipulatives, problem solving, higher order thinking, and various alternative assessment strategies. During a follow-up session, participants had the opportunity to discuss their plan for implementing two peer coaching sessions in each school. Time was also reserved to allow them to discuss concerns and questions they had about the planning and development of peer coaching sessions. Participants then convened for another sharing session. (This model can easily be coordinated with or adapted for Title I programs.)

Contact: Dr. Leo Edwards, Jr., Fayetteville State University, NC.

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**EXAMPLE: Reading Recovery**

Reading Recovery, an early intervention program that enables the lowest 20% of first graders "at risk" of reading failure to develop effective strategies to read at average classroom levels, was developed in New Zealand by Dr. Marie Clay. Once children complete the program, they usually need no further remediation in reading. Teacher training and continuing education are two of the five key components of Reading Recovery. Two levels of training are provided: (a) a year of academic course work prepares qualified individuals to teach Reading Recovery teachers at a district site; and (b) a year-long academic course prepares qualified individuals to teach Reading Recovery leaders. All teachers, teacher leaders, and instructors of teacher leaders must be involved in a year-long training period where they work with four students on a daily basis, make site visits to established sites to observe trained teacher leaders in action and learn to use the Reading Recovery procedures. Teacher leaders are additionally prepared to provide training, technical, and clinical support for Reading Recovery teachers. Instructors of teacher leaders are prepared to establish a state university Reading Recovery instructional center. Teachers work with students for an entire training year to learn and understand the Reading Recovery process.

Two follow-up programs ensure the continued quality of the implementation of the program. Continuing education: After the completion of the training year, the teacher leader maintains continuing contact with teachers and continues to monitor student progress. Teachers meet several times each year for inservice sessions in order to continue to develop critical knowledge and refine their skills. Teacher leader instructors and teacher leaders also attend two annual conferences. Monitoring: Reading Recovery teachers are monitored and supported by teacher leaders and teacher leaders are monitored and supported by the university faculty/staff from which they received their course work.

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Instructional aides: If an LEA or Title I school uses Title I funds to employ instructional aides, the aides must--

- ◆ possess the knowledge and skills sufficient to assist participating children in meeting the State's performance standards.
- ◆ have a secondary school diploma, or its recognized equivalent, or earn either within two years of employment. An aide does not need to meet this requirement if the aide possesses proficiency in a language other than English that is needed to enhance the participation of limited-English-proficient children in Title I programs.

- ◆ be under the direct supervision of a teacher who has primary responsibility for providing instructional services to participating children.

An LEA must include instructional aides in professional development activities, if feasible. In addition, an LEA or Title I school may use Title I funds to create career ladder programs for Title I instructional aides to obtain the education necessary to become licensed and certified teachers.

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**EXAMPLE:**  
**Teaching Opportunities for Paraprofessionals**

Connecticut's Teaching Opportunities for Paraprofessionals (TOP) program aims to increase the number of certified minority teachers serving students in the state's urban districts. Although only 26 percent of students statewide were minorities in 1992-93, the percentage was far higher in urban districts. To help provide role models and make the teaching force more reflective of the student population, the state created this paraprofessional-to-teacher program that provides financial, social, and academic support to support paraprofessionals' professional development and funds replacement paraprofessionals at the district. Through coordination with district and higher education partners, many paraprofessionals are able to complete their degrees and become regular classroom teachers.

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**EXAMPLE:**

**Training Opportunities for Bilingual Paraprofessionals**

The University of Southern California, in collaboration with California (Cal.) State Dominguez Hills, Cal. State Los Angeles (L.A.), and Loyola Marymount University and school districts in the L.A. area, provide a training program for bilingual paraprofessionals who plan to work toward completion of B.A. degrees and a B-CLAD credential with multiple subject specialization. The project is designed to reduce the obstacles to completing degrees and credentials by providing financial, social, academic, and school-site support. Participants are selected by individual school committees which include administrators, parents, teachers, and community members. Participants are enrolled in coursework at one of the participating higher education institutions. Each participant is assigned a school-based faculty mentor to provide support related to academic and social needs. Project seminars and practica provided at the school site enhance academic coursework. Supplemental workshops assist participants in preparing for State-mandated examinations. To encourage participants to continue their training through completion of B-CLAD, the project will provide financial assistance during the course of the credential training.

Program Contact: Reynaldo Baca, (213)740-2360.

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**EXAMPLE:****Training for Paraprofessionals in Early Childhood Education Programs**

In the Calcasieu School District in Lake Charles, Louisiana, early childhood education programs rely heavily on the skill and expertise of paraprofessionals. Recognizing the important role paraprofessionals play in supporting and contributing to the educational goals of the early childhood education programs, the district has developed a training program that not only focuses on clarifying their roles and responsibilities but also improves their instructional skills.

Each fall, the state holds an early childhood education conference; teachers and paraprofessionals who work in the programs receive training in appropriate practices and techniques for maximizing the impact of the center-based activities in their classrooms. Sessions are offered on a range of topics, including room arrangement, classroom management, and assessment. The school district offers a series of workshops throughout the year for teachers and paraprofessionals to work together, encourages paraprofessionals who are experiencing difficulties in fulfilling their duties to observe and work with a mentor at another site. Group discussions, role playing and modeling, and providing individual feedback are important features of these training sessions. Teachers and paraprofessionals agree that one major benefit of the training they have received is that they now work more effectively as a team in the classroom. By ensuring that teachers and paraprofessionals participate in the same training and receive the same information, district and school staff believe students receive a higher quality education and a richer school experience.

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State responsibilities

Although most professional development activities will be carried out at the LEA and school level, each SEA has a significant role in providing technical assistance to enable LEAs and schools to carry out those activities. An SEA must review each LEA's plan to determine if the LEA's professional development activities--

- ◆ Are tied to challenging State student content and student performance standards.
- ◆ Reflect current research on teaching and learning.
- ◆ Are designed to have a positive impact on teachers' performance in the classroom.
- ◆ Contribute to continuous improvement in the classroom or throughout the

## USES OF FUNDS



# USES OF FUNDS

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## USES OF FUNDS

The purpose of Title I, Part A funds is to enable schools to provide opportunities for children served to acquire the knowledge and skills contained in the challenging State content standards and to meet the challenging State performance standards developed for all children. The law provides many flexibilities and opportunities for LEAs and schools to meet the purpose of Part A. In schoolwide program schools, an LEA may use Part A funds for any activities that are part of the schoolwide program plan. In targeted assistance schools, however, Part A funds may only be used to meet the needs of participating children. Below is guidance on specific uses of Part A funds. This is not an exhaustive list of allowable Part A costs.

- Q1. May Part A funds be used to pay for employee benefits such as pension plans, unemployment insurance coverage, health insurance, severance pay, and life insurance?**
- A. Yes. Employers' contributions for employee benefits such as these are an allowable use of Part A funds provided the benefits are granted under approved plans and the costs are distributed equitably to the Part A grant and to other activities.
- Q2. May Part A funds be used to pay the salary costs for employees during periods of authorized absences such as annual leave, sick leave, and sabbatical leave?**
- A. Yes. Employee benefits in the form of compensation paid during reasonable authorized absences from the job are an allowable use of Part A funds if the benefits are provided under an established leave system and the costs are equitably allocated to all related activities, including the Part A program.
- Q3. What records are necessary to support the salary costs charged to Part A funds for an employee who works on Part A duties but also has other program responsibilities?**
- A. If the State applies Part 80 of EDGAR, which incorporates the cost principles in Office of Management and Budget (OMB) Circular A-87, the grantee must maintain appropriate time distribution records. If the State applies its own procedure rather than the procedures in 34 CFR Part 80, the method used must produce an equitable distribution of time and effort. Records must be retained for three years. **(A copy of OMB Circular A-87, which contains standards regarding time distribution, is provided at the end of this chapter.)**
- Q4. May Part A funds be used to pay the cost of renting or leasing privately owned facilities for instructional purposes or office space?**
- A. The cost to rent or lease space in privately owned buildings is allowable if the space is necessary for the success of the program and space in publicly owned buildings is not

available to the grantee.

- Q5. Are maintenance and operation costs such as janitorial services and utility costs allowable charges?**
- A. Maintenance and operation costs are allowable charges to Part A to the extent that the costs are not otherwise included in rent or other charges for space, are reasonable and necessary for the success of the program, and are distributed on an equitable basis.
- Q6. May Part A be used to construct or acquire real property?**
- A. No. The Title I statute does not authorize the use of Part A funds for construction or acquisition of real property.
- Q7. Does this mean that Part A funds may not be used to buy mobile vans or install wiring for vans or computers?**
- A. No. These are permissible uses of Part A funds. A mobile van is a piece of equipment, not real property. Items such as wiring for example, that make a van operational are part of the equipment.
- Q8. May Part A funds be use to provide training/professional development for instructional and pupil services personnel not paid with Part A funds?**
- A. The cost of training personnel not paid with Part A funds is an allowable charge if the training is specifically related to the Part A program and designed to meet the specific educational needs of Part A participants and supplements, rather than supplants, State and local training.
- Q9. May equipment be purchased with Part A funds?**
- A. Yes. An LEA, however, must determine that (1) the equipment is reasonable and necessary to effectively operate its Part A programs; (2) existing equipment will not be sufficient; and 3) the costs are reasonable.
- Q10. May Part A funds be used to pay the interest on lease purchase agreements for the purchase of, for example, computer equipment?**
- A. Yes, in accordance with the cost principles in OMB Circular A-87 included below.

Financing costs (including interest) paid or incurred on or after July 1, 1995 (for Part A) associated with otherwise allowable costs of equipment is allowable subject to the conditions in (1)-(4).

- (1) The financing is provided (from other than tax or user fee sources) by a bona fide third party external to the governmental unit.
- (2) The assets are used in support of Federal awards.
- (3) Earnings on debt service reserve funds or interest earned on borrowed funds pending payment of the construction or acquisition costs are used to offset the current period's cost or the capitalized interest, as appropriate. Earnings subject to being reported to the Federal Internal Revenue Service under arbitrage requirements are excludable.

**Q11. What procedures govern disposition of equipment purchased with Part A funds?**

- A. A State's procedures concerning disposition of equipment govern the disposition of Part A equipment. Section 80.32(b) of EDGAR requires that a State will dispose of equipment "in accordance with State laws and procedures." However, the State may follow as its State procedures the disposition provisions in §80.32(e) of EDGAR.

**Q12. When an LEA recovers funds from the sale of equipment or real property purchased with Part A funds, may these funds be retained by the LEA or school?**

- A. A State's procedures govern the disposition of Part A equipment and real property. If a State has decided to apply the provisions in §80.32(e) of EDGAR as its State procedures, an LEA may retain, sell, or otherwise dispose of equipment with a current per unit fair-market value of less than \$5,000 with no further obligation to the Federal government. If the equipment has a per unit value of more than \$5,000, §80.32(e)(2) requires the LEA to compensate the Federal Government. Similarly, §80.31(c) requires an LEA to compensate the Federal Government if it disposes of real property purchased in whole or in part with Chapter 1 or Title I, Part A funds.

A State may also adopt other procedures for disposing of Part A equipment and property. For example, a State may establish a threshold lower than the \$5,000 amount established in §80.32(e). In addition, instead of returning the proceeds to the Federal Government under §§80.31(c) and 80.32(e)(2), a State may permit LEAs to expend those proceeds in the Part A program.

**Q13. What happens to equipment purchased with Part A funds when it is no longer needed for Part A activities?**

- A. An LEA must dispose of unneeded Part A equipment in accordance with State law and procedures. If a State is following EDGAR, §80.32(c)(1) provides that when equipment is no longer needed for its original purpose, it may be used for activities currently or previously funded by other Federal programs. If a State's procedures permit, an LEA could also use the equipment for activities funded from non-Federal sources.

**Q14. What options does an LEA have to make maximum use of equipment purchased, in whole or in part, with Part A funds?**

**A.** An LEA has several options to increase flexibility in using Part A equipment. When an LEA purchases equipment with Part A funds, for example, it may share the cost with other Federal, State, or local programs that will also make use of the equipment on a proportional basis. Likewise, an LEA that wishes to use Part A equipment in non-Part A activities may pay a reasonable user fee to the Title I program for the portion of time the equipment is used in non-Part A activities. Further, an LEA may use Part A equipment in non-Part A activities without paying a user fee or sharing costs in accordance with the standards described in Q15. below. Additionally, an LEA may take into consideration when it decides its equipment needs under Part A whether other equipment--e.g., LEA-funded adult education equipment used at night--would be available for Part A use during the day.

**Q15. Are there circumstances under which Part A equipment may be used in non-Part A activities without paying a user fee or sharing costs?**

**A.** Yes, subject to the standards described below. Any equipment purchased with Part A funds must be reasonable and necessary to implement a properly designed program for Part A participants. The Department recognizes, however, that under some circumstances, equipment purchased as part of a properly designed Part A program may, without constituting an improper expenditure, be used on a less than full-time basis. If that equipment could be made available for other educational uses without interfering with its use in the Part A program or significantly shortening its useful life, the Department would have no objection to the non-Part A use, given the fact that it would otherwise be idle.

This guidance is consistent with 34 CFR 80.32(c), which allows equipment to be made available for use on other projects or programs currently or previously supported by the Federal Government, "providing such use will not interfere with the work on the projects or programs for which it was originally acquired." This guidance is also consistent with parallel flexibility afforded to institutions of higher education, hospitals, and nonprofit organizations in 34 CFR 74.137, which permits shared use of equipment purchased with Federal funds in non-Federally funded, as well as Federally funded, projects. Because a State may adopt its own procedures for use of Part A equipment, it could adopt the flexibility in §§80.32(c) or 74.137. The guidance set forth below assists in ensuring that limited use of Part A equipment in non-Part A activities does not interfere with the Part A program and is consistent with the Part A statute and regulations.

An LEA that decides to use Part A equipment in non-Part A activities on a part-time basis must do so in a manner that protects the integrity of the equipment as a Part A expenditure. Accordingly, the LEA must ensure and document that the Part A equipment is part of a Part A program that has been properly designed to meet Part A participants'

needs; that the equipment purchased with Part A funds is reasonable and necessary to operate the LEA's programs, without regard to any use in non-Part A activities; that the program has been designed to make maximum appropriate use of the equipment for Part A purposes; and that the use of the equipment in non-Part A activities does not decrease the quality or effectiveness of the Part A services provided to Part A children with the equipment, increase the cost of using the equipment for providing those services, or result in the exclusion of Part A children who otherwise would have been able to use the equipment.

LEAs should be judicious in applying these standards. The Secretary will presume, absent actual evidence to the contrary, that the standards have been met and that use of Part A equipment in non-Part A activities is proper if that use does not exceed 10 percent of the time the equipment is used in Part A activities. However, use above that amount in non-Part A activities is not necessarily improper if the standards are met on a case-by-case basis.

The following examples illustrate some situations in which Part A equipment may be used in non-Part A activities:

- (1) Computers purchased with Part A funds are used full-time during the school day but are idle during evening hours and would be beneficial to adult education classes that meet twice a week. The use in the adult education classes would not be extensive and, therefore, would not significantly shorten the useful life of the equipment. Under these circumstances, the Part A computers may be used for the adult education classes.
- (2) Part A computers that are part of a properly designed Part A program are being used full-time except for one period each school day. The proper amount of computer equipment was purchased for the Part A program and the Part A program cannot be redesigned effectively to use the computers in every period. Under these circumstances, the Part A computers may be used, for example, for State or locally funded supplemental education activities during the period they are idle.
- (3) Ten listening centers were purchased with Part A funds are used regularly but not continuously in the Part A program. The Part A program cannot be designed effectively to use the centers more frequently. The listening centers are used in an extracurricular foreign language program for periods of time averaging 10 percent of the time devoted to Part A. If the useful life of the centers is not significantly reduced, the centers may be used in this manner.

**Q16. May Part A funds be used to pay for travel and conference costs?**

- A.** The costs for staff travel and conferences are allowable if the travel and conferences are

specifically related to the Part A program and not to the general needs of the LEA or school and are reasonable and necessary.

**Q17. May Part A funds be spent for food and refreshments provided during parent meetings or training?**

A. Reasonable expenditures for refreshments of food, particularly when such sessions extend through mealtime, are allowable.

**Q18. May Part A funds be used to purchase insurance for vehicles used to transport school personnel for home visits or parents for school visits?**

A. Yes. However, the allowable portion of the cost should be calculated on the basis of the percentage of time the vehicle is used for Part A and home visits.

**Q19. May parents be paid to attend meetings?**

A. No. The statute does not authorize an LEA to pay a parent to attend a meeting or training session or to reimburse a parent for salary lost due to attendance at Part A parental involvement activities. Parental involvement expenditures are limited to costs that a parent may incur to participate, such as babysitting fees.

**Q20. The ESEA contains Title XI entitled "Coordinated Services." May Part A funds be used as part of a coordinated services projects?**

A. Title XI of the ESEA offers an LEA on its own behalf or on behalf of one or more of its schools (or individual schools or group of schools if there is no governing LEA) an opportunity to use up to 5 percent of the ESEA funds it receives to develop, implement, or expand a coordinated services project. The statute defines a "coordinated services project" as "a comprehensive approach to meeting the educational, health, social service, and other needs of children and their families, including foster children and their foster families, through a community-wide partnership that links public and private agencies providing such services or access to such services through a coordination site at or near a school." The Department has issued preliminary guidance for Coordinated Services Projects. To obtain a copy, please call (202)260-0826.