

Department of Grant Compliance and Administration Statewide Training Series

Questions & Answers

Training Title: Title II, Part A—Program Overview

Training Date: 8/24/2021

For additional information, please contact us at ESSASupport@tea.texas.gov.

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Carryover

Q1: Will there be a maximum amount or percentage a district can carryover into 21-22 for Title II in their ESSA Grant? Attempting to spend 2019-2020 Title II, Part A funds AND Title II, Part A funds for 2020-2021, we found many staff development strategies got put on hold (due to pandemic). We are looking at having unobligated funds remaining for 2020-2021 and hope that we can roll/carryover to 2021-2022.

A1: There is no statutory limitation on the amount of Title II, Part A funds that can be carried over.

Q2: Are there any timelines that can be shared regarding when the 2019-2020 ESSA application will be opened again?

A2: Per the "[To the Administrator Addressed](#)" letter that was issued on September 16, 2021, the budget amendment deadline for the 2019-2020 ESSA Consolidated Federal Grant Application has been extended to April 1, 2022. The LEA may only amend the budget schedules for the 2019-2020 grant application; no programmatic amendments will be accepted.

Coordination

Q1: What is an example of coordination with a community activity?

A1: The Title II, Part A Non-Regulatory Guidance and/or ESEA provides the following examples of recommended strategies related to coordinating with the community.

Teacher Leadership - Participating in community of learning opportunities and other professional development opportunities with diverse stakeholder groups such as parents, civil rights groups, and administrators, to positively impact student outcomes; for example, through a forum to discuss the implication of a policy or practice on a school community, or organizing a community-wide service learning project, where teachers afterwards work together to imbed conclusions of these activities into their teaching.

Educator Cultural Competence - Improving the recruitment, placement, support, and retention of culturally competent and responsive educators, especially educators from underrepresented minority groups, to meet the needs of diverse student populations. These efforts may include, but are not limited to: Providing financial support to educator recruitment programs within the community to improve hiring and retention of a diverse workforce; Offering career advancement opportunities for current staff members, such as paraprofessionals, who have worked in the community for an extended period of time, to support their efforts to gain the requisite credentials to become classroom instructors; and Partnering with preparation providers including local community colleges, Institutions of Higher Education (IHEs), Minority Serving Institutions, and alternative route providers, to build a pipeline of diverse candidates.

Evidence-Based Professional Development - ESSA promotes the implementation of high-quality, personalized, evidence-based professional development for teachers, instructional leadership teams, principals, or other school leaders, that is focused on improving teaching and student learning. Under ESSA, professional development should be sustained, personalized, and job-embedded initiatives that address identified needs rather than stand-alone, one-day, or short-term professional development. ESSA states this professional development may include training teachers, principals, or other school leaders to: Effectively engage parents, families, and community partners and coordinate services between school and community; and develop policy with school, local educational agency, community, or State leaders.

Supporting Students Affected by Trauma and/or Mental Illness - ESSA supports the provision of in-service training for school personnel in techniques and support related to identifying and supporting students affected by trauma or mental illness, including the use of referral mechanisms, 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 planning for your LEA's Title II, Part A program; and partnering with community partners for topic specific professional development opportunities (i.e. mental health, safety, health, nutrition, etc.).

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 low-income percentage, which is what the second 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.

Professional Development

Q1: Professional development can't be a one-time training, correct? Example: a trainer that comes to provide training on techniques that can be used in classroom to enhance teaching. Is this allowable, since teachers would be implementing the techniques in classroom?

A1: One-time trainings or stand-alone seminars can be allowable only if they are part of a broader professional development program or plan. It would be possible for an LEA to group several one-time trainings into a professional development plan for one or more of its teachers and/or principals.

Q2: Can we spend Title II funds for master's degree classes for a teacher needing those to teach AP classes?

A2: It can be allowable for Title II, Part A to pay for coursework that meets the ESSA definition of professional development, as well as the steps and requirements listed in the Use of Funds section of the Title II, Part A Program Guide.

REAP/Funding Transferability

Q1: Can you clarify that REAPing or transferring to Title I, Part A would be the same as using as Title II, Part A since there's that flexibility? Could Title II, Part A funds that are REAPed or transferred still be used for professional development?

A1: Title II, Part A funds that are REAPed or transferred to Title I, Part A are then used according to Title I, Part A rules. The funds may still be used for professional development, but this would be

based on the Use of Funds requirements for Title I, Part A, and would have to meet the intent and purpose of the Title I, Part A program.

Supplement, Not Supplant

[Note: Questions 1-7 under the “Supplement, Not Supplant” heading are the scenarios that were discussed in the Title II, Part A—Program Overview session of the Statewide Training Series.]

Q1: Is it allowable for Title II, Part A funds to be used for the Reading Academies?

A1: Traditional SNS precludes Title II, Part A from being used for the Reading Academies in the instances where the academies are a state requirement. Therefore, the only instance where the academies may be considered allowable under Title II, Part A is if an LEA wants to provide the training to non-K-3 teachers. The HB3 state requirement is only for Principals and K-3 Teachers.

Q2. Can we use Title II to pay for substitutes for our teachers who are attending the Reading Academies?

A2: Because the Reading Academies are a state requirement, Title II, Part A funds cannot be used to pay for substitutes for teachers who attend them to meet the state requirement. In cases where a training is supplemental, however, Title II, Part A funds can be used to pay for substitutes.

Q3: Can an LEA use Title II, Part A funds to pay an annual membership to a job application system that allows applicants to submit one common online application to all participating LEAs? This system provides employers with easy access to thousands of applicants seeking employment in the education industry. Members benefit by avoiding the costly advertising expenses for open positions, and they have easy access to web-based modules that facilitate the applicant screening and hiring process.

A3: An employment application system such as the one described is usually for all LEA employees, including employees that may not be considered intended beneficiaries of the Title II, Part A program (i.e. food service, custodial, transportation, etc.). This raises concerns for potential 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.

Q4: Would it be an allowable use of funds to have Title II, Part A funds pay the salary of an Assistant Superintendent who supervises principals?

A4: 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.

Q5: 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?

A5: 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.

Q6: Can Title II Part A split-fund costs with Title I since Title funds can only cover the cost of Title schools? For example, substitutes for training or programs that are evidence based?

A6: 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 with LEA policies and procedures.

Q7: An LEA has conducted its needs assessment and has, as part of its plan, set aside a week of training that will begin this year and continue annually. This week will be at the end of July or first of August and it is outside of the teachers' contracted days. This is to be part of the LEA's ongoing PD for teachers in the classroom. The LEA want to separate it from all the back-to-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?

A7: 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. It would be permissible to use Title II, Part A funds to be used for stipends to pay teachers for their time to attend supplemental training that is scheduled outside their contracted days.

Use of Funds

Q1: Would a Homegrown Program—training our own paraprofessionals to become certified teachers—be allowable under Title II, Part A as part of recruiting and retaining teachers? Would this be able to include tuition, fees, books, classroom internships, and payroll?

A1: A “Homegrown Program” to provide paraprofessionals the opportunity to become certified teachers could be an allowable activity, but it would more properly fall under the Professional Development area of focus. The statutory definition of “professional development” states that one of the allowable activities is to—

“create programs to enable paraprofessionals (assisting teachers employed by a local educational agency receiving assistance under Title I, Part A) to obtain the education necessary for those paraprofessionals to become certified and licensed teachers.”
[Section 8101(42)(B)(xvi)]

Depending on the LEA’s policies and procedures, the costs associated with such a program could include tuition, fees, books, internships, and/or stipends. The actual salary for such a paraprofessional would not be an allowable expense for Title II, Part A because the position would not be one that is providing Title II, Part A services. However, this could be allowable for Title I, Part A, provided that the need for the paraprofessional met the Title I, Part A Use of Funds requirements.

Q3: I have heard guidance that federal funds should not be used for substitute pay, and I have also heard that substitute pay should follow the funding stream of the staff that are being subbed for. What is the guidance for whether Title II, Part A funds can pay for substitutes?

A3: Title II, Part A funds may not be used to pay for substitutes to cover general absences; one exception would be if the LEA, according to its local policies and procedures, uses Title II, Part A funds to pay for substitutes for teachers who are paid with Title II, Part A funds. This would only apply to Title II, Part A teachers who are part of an evidence-based class-size reduction program.

Title II, Part A funds may be used to pay for substitutes to allow teachers to attend a Title II, Part A-funded training.

Substitute pay for private school teachers is not allowable under any circumstances.

Q4: In the Title II, Part A provisions and assurances, it states: Title II program activities will address the learning needs of all students, including children with disabilities, English Learners, and gifted and talented students. This is also a question in the compliance report (pre-COVID). Is this a requirement?

A4: Section 2103(b) does state that an LEA receiving Title II, Part A funds “shall use the funds made available through the subgrant to develop, implement, and evaluate comprehensive programs and

activities described in subsection (b), which ...shall address the learning needs of all students, including children with disabilities, English learners, and gifted and talented students....”

It is a requirement that the LEA address the learning needs of all students in the planning and implementation of its Title II, Part A program. Not every activity has to address all students, but the totality of the program should ensure that the learning needs of all students are addressed.

Q5: Is there a list of state-mandated activities?

A5: The [Title IV, Part A School Safety State Initiative](#) at ESC 14 has an extensive list of state-mandated training and professional development under its District/LEA Resources. It is important for the LEA to document the training that it conducts/obtains with state/local funds. When the required amount of training for a particular topic is met, additional training beyond that amount for that topic would be considered supplemental and could be allowable with Title II, Part A funds provided that the other requirements in the Use of Funds section of the Title II, Part A Program Guide are met.