

Title II, Part A – The Ins and Outs

March 11, 2024

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Agenda

Icebreaker Activity – Can Title II pay for that?

Allowability Review and Discussion

Needs Assessment Requirements

Class Size Reduction Review

Private School Reminders

Questions and Answers



Purpose of Title II, Part A

ESEA Section 2001

- The purpose of this title is to provide grants to State educational agencies and subgrants to local educational agencies to—
- (1) increase student achievement consistent with the challenging State academic standards;
- (2) improve the quality and effectiveness of teachers, principals, and other school leaders;
- (3) increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and
- (4) provide low-income and minority students greater access to effective teachers, principals, and other school leaders.



Can Title II Pay for That?

- An LEA wants to pay a portion of an interventionist's salary since they are providing professional learning as a part of their job. Is this allowable?



Can Title II Pay for That?

- An LEA wants to purchase golf shirts/district attire to wear on recruiting trips. Is this allowable?



Can Title II Pay for That?

- An LEA wants to use Title II funds to train teachers on technical aspects of a new attendance system (i.e. how to enter attendance data). Is this an allowable use of TII funds?



Can Title II Pay for That?

- An LEA wants to provide stipends for paraprofessionals to participate in PD outside of their contracted hours. Is this allowable?



Can Title II Pay for That?

- Can Title II-A funds be used for professional learning for Social Workers in a private school? Would they be considered “school leaders”?



Title II

Allowability Overview



Title II Allowability

Recruit and Retain HE Teachers

- Signing bonuses
- Differential pay
- Recruitment fair registrations and travel
- Induction programs
- Teacher mentors
- Class size reduction
- Incentives for teachers and principals who have a record of success



Title II Allowability

PD - Teachers

- Improve content knowledge
- Improve instructional practices such as:
 - Addressing the needs of students with different learning styles
 - Improving student behavior in the classroom
 - Involving parents in their children's education (especially limited English proficient)
 - Understanding and using data and assessments to drive instruction
 - Integrating technology into instruction
- Supplements, stipends, and substitutes



Title II Allowability

Title II funds can be used to purchase *PD supplies* that are reasonable and necessary to carry out the PD.

- **MAY** purchase professional learning books for a book study on a topic that aligns with the needs assessment
- **MAY NOT** purchase books to stock a professional learning reference library
- **MAY** purchase 15 graphing calculators for 15 teachers to use during PD on math content
- **MAY NOT** purchase a classroom set of graphing calculators for the teacher to implement the strategies learned

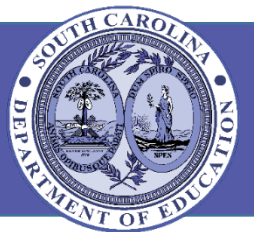


Title II Allowability

Professional Development

Under section 2103 (b)(3)(E) of ESEA, as amended by ESSA, districts may use Title II funds to provide PD for:

- Teachers
- Instructional leadership teams
- Principals
- Other school leaders



Title II Allowability

PD - Leadership

Section 81010 (44) of ESEA, as amended by ESSA, defines “school leader” as a principal, assistant principal, or other individual who is

1. An employee of an elementary or secondary school, district, or other entity operating an elementary or secondary school
2. Responsible for the daily instructional leadership and managerial operations in the elementary or secondary school building



PD - Leadership

Title II Allowability

- Professional development to help principals and superintendents become outstanding managers and educational leaders
- Development and support of academies to help talented aspiring principals or superintendents



Multiple Career Paths

Title II
Allowability

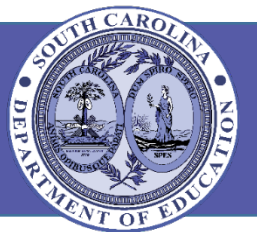
- PACE program
- CTE Work Based Certification Program
- Teach for America
- EPI



Title II
Allowability

Teacher Advancement

- Promote professional growth
- Emphasize multiple career paths
- Mentor training
- Additional certifications
(Montessori, GT, ESOL, etc.)
- National Board
- Advanced degrees



When determining the allowability of expenditures, consider these questions:

- How does the action/item support the LEA's Title II, Part A prioritized needs and selected equity interventions?
- Does the LEA have a viable plan (plan/timeline/person(s) responsible for monitoring implementation and results) to determine the effectiveness of this action/item in meeting desired outcomes?
- Is this action/item required by any local, state, or Federal (other than Title II, Part A) policy or procedure? (If so, this is supplanting.)
- Would the LEA provide this action/item in the absence of Title II, Part A Program funds? (If so, this is supplanting.)
- What is the research base and evidence of effectiveness of this action/item?
- What is the plan for sustainability/future costs to support the action/item?



Title II: Planning

Needs Assessment



Needs Assessment: Purpose

In South Carolina, the needs assessment is conducted to meet Federal Title II, Part A requirements. It is recommended that the needs assessment components required for Title II, Part A are addressed in conjunction with needs assessment components required by other titles of ESEA/ESSA.

Districts should gather information concerning teaching force and school leader needs to support all students in meeting challenging State content and academic achievement standards.

The needs assessment process can be completed as a component of a comprehensive needs assessment or at the program level.



Needs Assessment: Requirements

- While the law requires stakeholder involvement and lists specific stakeholders to include, how the stakeholders are included is at the discretion of the LEA (e.g., through surveys, focus groups, meeting and other means of collecting data).

Consultation must include:

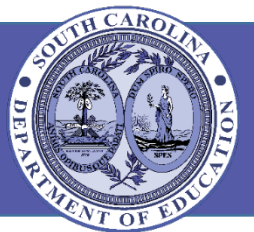
- Teachers,
- Principals,
- Other School Leaders,
- Paraprofessionals (including organizations representing such individuals),
- Specialized Instructional Support Personnel,
- Charter School Leaders (in an LEA that has charter schools),
- Private School Administrator



Needs Assessment: Requirements

LEAs must explicitly address their findings (strengths and areas of growth) for each of the following components:

- **Professional Learning** (Paraprofessionals, Teachers, Assistant Principals, Principals, and Superintendents and Equity of Meeting the Needs of Diverse Student Learners)
- **Personnel** (Recruitment, Retention and Equity of Teacher Quality and Experience)
- **Factors that Impact the Learning and Work Environment** (Class Size Reduction)
- **Title II, Part A Administration** (Prioritizing Funds Equitably)



Needs Assessment: Suggested Data Sources

- The law does not require that the needs assessment process include particular types of data. The data sources listed below are suggestions from the Title II, Part A Nonregulatory Guidance and the South Carolina Title II, Part A State Coordinator.
 - **Student Achievement:** Local Assessments, National Assessments, State Assessments
 - **Professional Learning:** Teacher Surveys, Demographic Data, Equity Data Profile, PD Course Schedule, PD Evaluations, PD Participation, Student Achievement Data, Student Attendance, Student Discipline
 - **Personnel:** Equity Data Profile, Exit Surveys, HR Feedback, Induction Feedback, Staff Attendance, Teacher Surveys
 - **Factors that Impact the Learning and Work Environments:** Attendance Data, Demographic Data, Discipline Data, Program Data, Teacher Surveys
 - **Title II, Part A Administration:** Audit Reports, Effectiveness Data, Equity Data Profile, Internal Controls, Monitoring Reports, Program Data, School Data, School Improvement School List, Teacher Surveys



Needs Assessment Process: Richland Two

[Richland Two Needs Assessment](#)

[Needs Assessment Timeline Example](#)

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Title II: Planning

Class Size Reduction (CSR)



Class Size Reduction (CSR)

LEAs may reduce class size by creating additional classes in a particular grade or subject and placing qualified teachers hired with program funds in those classes.

- Federal funds cannot be used to meet state or local class size requirements. **(Refer to State Regulation 43-205 for requirements)**
- The school and grade level for CSR must be documented in the Needs Assessment and listed in the online application.
- CSR cannot be used for gifted or SPED programs.

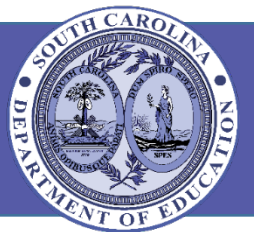


Class Size Reduction (CSR)

[Quick Guide: Title II, Part A Class Size Reduction](#) (PDF, 172kb - 5/11/17)

SCDE does not have a specific list, and also makes it clear that LEAs have flexibility:

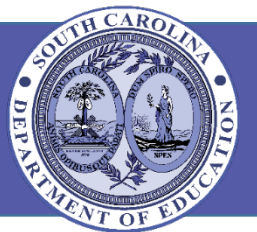
- “Some examples of how LEAs might use this strategy to reduce class size include but are not limited to:” (page 1)
- “LEAs have the flexibility to explore these and other alternatives for reducing class sizes, provided that qualified teachers are used.” (page 1)



Class Size Reduction (CSR) Supplement, Not Supplant

ESSA, [Section 2301](#)

- In general, Title II, Part A funds cannot be used to meet state or local requirements.
- For class size reduction, this means Title II, Part A funds can only be used to reduce class size below state or local requirements.



CSR Resources

[Quick Guide Class Size Reduction.pdf \(sc.gov\)](#)

- Covered in detail
 - Remember, must account for LEAs that have maximums below state maximum
-
- [Title II, Part A Class Size Reduction Worksheet](#) (PDF, 45kb - 5/11/17)
 - Very helpful calculator for LEAs



Title II: Equitable Services

Under Title VIII, Part F



Purpose

- Increase student achievement
- Improve quality and effectiveness of teachers, principals, and other school leaders
- Increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement; and
- Provide low-income and minority students greater access to effective teachers, principals, and other school leaders. (ESEA section 2001).



Equitable Services

Any use of Title II, Part A funds for the benefit of private school participants must:

- be an allowable local use of Title II, Part A funds under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act of 2015 (ESSA) [Section 2103(b)(3)]
- meet the specific needs of students enrolled in a private school and not the school itself. [34 CFR 76.658]; and
- ensure that the public agency (e.g., school district) responsible for providing equitable services retains control of the funds used to provide such services. Equitable services must be provided by either an employee of the public agency or through a contract by the public agency with an individual, association, agency or organization independent of the private school and any religious organization. [ESEA Section 8501(d)]



Equitable Services

- Equitable services under Title II, Part A may not be used for class-size reduction in a private school

Reason

- Contracts for private school teachers and staff would be inconsistent with the requirements in ESEA Section 8501(d) regarding public control of funds and the supervision and control of employees or contractors.



Calculations

EXAMPLE OF FORMULA TO DETERMINE AMOUNT FOR TITLE II, PART A EQUITABLE EXPENDITURES	
A. Number of Students	
A1: LEA Enrollment	900
A2: Participating Private Schools Enrollment	100
A3: Total Enrollment = $A1 + A2$	1,000
B. Title II, Part A Allocation	
B1: Total LEA Allocation	\$1,000,000
B2: Administrative Costs (for public and private school programs)	\$50,000
B3: LEA Allocation Minus Admin Costs = $B1 - B2$	\$950,000
C. Per Pupil Rate	
C1: B3 divided by A3	\$950
D. Equitable Services	
Amount LEA must reserve for equitable services for private school teachers and other educational personnel = $A2 \times C1$	\$95,000

- Equitable services under Title II, Part A may not be used for class-size reduction in a private school



Allowable Use of Funds

- As with any activity that the school district carries out for public school teachers, activities supported with Title II, Part A funds that benefit private school teachers must meet the requirements of the statute. For example, activities to be carried out for private school personnel must be based on a review of evidence-based research and must be expected to improve student academic achievement. Professional development activities may include:
- improving the knowledge of teachers, principals, and other educational personnel in one or more subjects and in effective instructional teaching strategies, methods, and skills;
- training in effectively integrating technology into curricula and instruction;
- training in how to teach students with different needs, including students with disabilities or English learners, and gifted and talented students;
- training in methods of improving student behavior, identifying early and appropriate interventions, and involving parents more effectively in their children's education;
- leadership development and management training to improve the quality of principals and superintendents; and
- training in the use of data and assessments to improve instruction and student outcomes.
- To the extent that a teacher's attendance at a conference sponsored or conducted by a faith-based organization is part of a sustained and comprehensive secular professional development plan,
- Title II, Part A funds may be expended to pay for the portion of the costs of the conference that, as determined by the school district, represent the secular professional development in which the teacher participated. By law, use of federal funds to support religion is prohibited.



Terms/Timelines of Grant



- Discussed during initial consultation
- Private schools CAN use the funds past 1 year
- Allowed to use entire time of the grant

Denial of Funds



- Private schools can deny the funds after they receive their allocation
- Must be offered to the remaining participating private schools
- If they accept, recalculation must be completed
- If they deny additional funds, LEA may use in public schools
- **NOTE:** Must be communicated during the consultation

Resources

Under the Congressional Review Act, Congress has passed, and the President has signed, a resolution of disapproval of the accountability and State plans final regulations that were published on November 29, 2016 (81 FR 86076). Because the resolution of disapproval invalidates the accountability and State plan final regulations, the portions of this guidance document that rely on those regulations are no longer applicable. The remainder of this document, however, is unaffected by the resolution of disapproval.



Non-Regulatory Guidance for Title II, Part A: **Building Systems of Support for Excellent Teaching and Leading**

U.S. Department of Education Non-Regulatory Guidance
Title II, Part A of the Elementary and Secondary Education Act of 1965,
as Amended by the Every Student Succeeds Act of 2015
September 27, 2016

Department of Education Website:

<https://www2.ed.gov/policy/elsec/leg/essa/essatitleiipartaguidance.pdf>

STATE OF SOUTH CAROLINA DEPARTMENT OF EDUCATION

ELLEN E. WEAVER
STATE SUPERINTENDENT OF EDUCATION



Allowable Use of Funds Guidance

Elementary and Secondary Education Act (ESEA) Programs

May 31, 2023

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SCDE Website:

<https://ed.sc.gov/policy/federal-education-programs/esea-title-ii-part-a1/allowable-use-of-funds/>



Resources

Title VIII, Part F of the Elementary and Secondary Education Act of 1965:

**Equitable Services for
Eligible Private School Children, Teachers, and Other
Educational Personnel**

Non-Regulatory Guidance



U.S. Department of Education
July 17, 2023

Department of Education Website:

<https://ed.sc.gov/policy/federal-education-programs/esea-title-ii-part-a1/allowable-use-of-funds/>



QUESTIONS



Thank you for participating!

Please reach out to us if you have any questions:

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