

Q: What is an appropriate funding source for sending Distinguished Schools to the National Title I Conference for national recognition now that state-level rewards dollars are no longer available?

(Bob): Julia... This question came up during today's **Effective Programs & Quality Outcomes Committee**: Is it an allowable use of Title I state admin funds to support travel and related expenses to the National Title I Conference for designated Distinguished Schools? Are there other viable sources for such? Bob

(Julia): Hi Bob,

Good question. I suppose it comes down to the purpose of the distinguished schools being there.

State admin funds are intended to be used to administer the Title I grant overall. They're a pretty flexible pool of funds, but I'm concerned you would run up against the "necessary and reasonable" test. Is sending these schools to the conference necessary and reasonable for the administration of the grant by the State?

I think Title II State-level activities funds (sec. 2101(c)) might be a better fit so long as they're attending sessions – you could classify this as "professional development," especially since there are so many sessions on teaching and learning. You could talk about how important it is to reward/incentivize improvement and encourage those schools and professionals to meet their peers and continue to develop best practices. Even better if you're able to have them chat afterwards with State folks about what they've learned and how to incorporate that into general PD/State strategies, since then you're "developing" PD. It is important for this to be evidence-based, but given that so many of your sessions are based on research that shouldn't be hard.

The Uniform Grants Guidance says that "the cost of training and education provided for employee development is allowable" (200.472). So if the employees are going to hear presentations that are useful to their position and work, the cost of registration for the conference would be allowable. The UGG also states that travel costs are allowable (200.474) so long as they don't violate or exceed the entity's own travel policies, and so long as participation is "necessary to the federal award." Generally, I don't see this as a barrier if we're meeting the necessary and reasonable test above.

Julia

(Bob): This very helpful, Julia. Thank you. Jack O'Connor (MT) also suggested these as options (see below). Bob

Section 1003 pg 11

(g) UNUSED FUNDS.—If, after consultation with local educational agencies in the State, the State educational agency determines that the amount of funds reserved to carry out subsection (b) is greater than the amount needed to provide the assistance described in that subsection, the State educational agency shall allocate the excess amount to local educational agencies in accordance with— (1) the relative allocations the State educational agency made to those agencies for that fiscal year under subpart 2 of part A; or (2) section 1126(c).

Section 1126 pg 108

(c) REALLOCATION.—If a State educational agency determines that the amount of a grant a local educational agency would receive under sections 1124, 1124A, 1125, and 1125A is more than such local educational agency will use, the State educational agency shall make the excess amount available to other local educational agencies in the State that need additional funds in accordance with criteria established by the State educational agency.

(Julia): As for the sections [above], the intent is to reallocate for the same purposes of the grant, and that's for school improvement targeting schools in intervention or Title I formula. I would be cautious here about whether this meets the necessary/reasonable test.