

Title II, Part A Eligible Activities and Expenditures

Please note that this document may not provide every activity that could be eligible and additional clarification may be necessary by contacting the Title II Grant Program Specialist or the Title II Program Monitor.

The purpose of Title II, Part A is to improve the academic achievement of all students by increasing access to effective educators. Unlike most other Title programs, its activities are intended for adults, not students.

Effective teachers demonstrate a deep understanding of the curriculum and provide high-quality, researched-based instruction to promote mastery for all students. Effective teachers provide a respectful, positive, safe, and student-centered environment. They collaborate with colleagues, analyze data and plan for effective, equitable instruction. Effective teachers build positive and professional relationships with students, parents, and community members.

Title II eligible activities/expenditures should be the result of needs identified by the local educational agency (LEA) and stakeholders based on the results of a comprehensive needs assessment. The cost must be reasonable, necessary and allocated consistent with the purpose of Title II. The use of Title II funds must also be supplemental and cannot support activities that are required by state or federal rules or would otherwise occur without the availability of Title II funds.

More information on high-quality, researched-based or evidence-based instruction can be found on the companion documents located on the [Title II webpage](#).

Nonpublic Services

For nonpublic services, the LEA may only use Title II funds to provide professional development including tuition reimbursement. It is not allowable to use Title II funds for recruitment and retention of nonpublic staff or class size reduction in a nonpublic school.

Supplement Not Supplant Clarifications

Federal funds including Title II cannot be used to supplant or replace other available funds or provide activities that are required by other federal, state or local laws or rules. Federal funds may be used for an activity that is not required, when previous funding is no longer available, or to expand participation beyond what other available funds provide as long as the activity and costs are necessary and reasonable to meet the federal award's purpose.

Recruitment, Retention and Incentive Compensation Agreement

Title II funds may be used to (a) recruit effective educators, (b) mentor them during their first three years in a new teaching assignment, and (c) support practices to improve retention of effective educators, particularly in schools with students at greater risk of not meeting academic standards. Activities include tuition assistance.

Federal grants management regulations known as the Uniform Grant Guidance require that any additional payment or benefit that is a bonus or incentive must be reasonable and paid according to an [established, written agreement with the employee or an LEA plan that implies an agreement](#). [2 CFR 200.430(f)]

Recruitment and Retention Activities

Includes the appropriate object code in bold for each activity.

Type of Cost	Eligible Activities/Expenditures	Non-Eligible Activities/Expenditures
Recruitment	<p>Advertising, job fairs, expert help [Object code 303/304], materials [401] and other costs to recruit effective educators.</p> <p>Stipend or bonus authorized in written LEA plan or agreement for recruiting a teacher or school leader [185].</p> <p>Signing bonuses [185], salary differentials [140] or incentive pay to work in high-need subjects or schools or to reflect the diversity of the student enrollment consistent with a written LEA plan or agreement [185].</p> <p>Cost of a state-approved assessment to qualify as an instructional paraprofessional in a Title I program (such as the ParaEducator Online assessments or ParaPro test) [389].</p> <p>Travel costs of employees while engaged in recruiting personnel [366 or 368] if traveling outside Minnesota].</p> <p>Travel costs of applicant to interview for prospective employment [366 or 368] if traveling from outside Minnesota].</p> <p>Costs of advance trips and temporary lodging up to 30 days to find a new home. [299] as a taxable benefit].</p> <p>Transportation costs of the employee, immediate household members and personal effects to the new location. [299] as a taxable benefit].</p>	<p>Not allowed for nonpublic service.</p> <p>Not allowed for non-instructional staff.</p> <p>Supplanting state funds received for recruiting educators.</p> <p>Fees and other costs associated with acquiring a new home.</p> <p>A loss on the sale of a former home.</p> <p>Continuing mortgage principal and interest payments on a home being sold.</p> <p>Income taxes paid by an employee related to reimbursed relocation costs.</p>

Type of Cost	Eligible Activities/Expenditures	Non-Eligible Activities/Expenditures
Induction/Mentoring	<p>New educator orientation training [185].</p> <p>Compensation for induction and mentoring activities in addition to the normal work contract consistent with a written agreement or LEA plan [185].</p> <p>Development and support for LEA-based preparation programs for administrators [185].</p> <p>Substitutes for teachers to participate in mentoring and induction activities [185].</p> <p>Mentoring for staff providing instruction [185].</p>	<p>Not allowed for non-instructional staff.</p> <p>Supplanting state funds received for mentoring.</p> <p>Food and refreshments.</p>
Retention	<p>Bonus [185] or differential pay [140] authorized in a written agreement or LEA plan for selected teachers.</p> <p>Cost of state tests for a teacher to add a license endorsement for a different grade span or subject [389].</p> <p>Cost of certification issued by the National Board of Professional Teaching Standards [389].</p>	<p>Not allowed for nonpublic services.</p> <p>Not allowed for non-instructional staff.</p> <p>Supplanting state funds received for teacher retention.</p> <p>Cost of cost-of-living or collective bargaining increases.</p> <p>Costs for required CEUs and license renewal.</p>

Professional Development

The ESEA and Minnesota Statutes require professional development to be sustained, personalized, evidence-based and job-embedded initiatives that address identified needs. This may include activities such as coaching, active learning opportunities for teachers to observe and receive feedback, make presentations, productive professional learning communities, and classroom-focused research.

Title II, Part A funds cannot be used to support stand-alone one-day or short-term workshops or conferences that do not connect to a larger LEA-wide or individualized plan. To be effective, professional development must (a.) be sustained for at least 20 to 40 hours, per person, over a year, including summer months, for each identified need and (b.) provide the knowledge and skills necessary to enable students to meet academic standards and succeed in a well-rounded education.

To be an allowable Title II expense, the following questions should be addressed.

Is the professional development:

1. related to an evidence-based strategy or activity that demonstrates a statistically significant effect on or likelihood of improving outcomes?
2. supplemental to what is required of a teacher or administrator to obtain or renew their license?
3. supplemental to what is required of the LEA to comply with state or federal law?
4. supplemental to professional development that would be provided without the availability of Title II using, at least in part, the state requirement to reserve two percent of the general allocation for this purpose?
5. sustained over time to address an identified need?

Professional Development Activities

Includes the appropriate object code in bold for each activity.

Type of Cost	Eligible Activities/Expenditures	Non-Eligible Activities/Expenditures
Instructional / Professional Staff	<p>Activities that meet the federal definition of sustained professional development [303, 366 or 368] to:</p> <ul style="list-style-type: none">• identify and address academic and nonacademic student needs• increase student attendance and engagement• learn about and implement evidence-based strategies/practices• improve curriculum after initial adoption year• design, develop, align, map, or revise curriculum or assessments• learn strategies for a culturally diverse classroom• recognize bias• improve instruction.	<p>Training required to renew license.</p> <p>Training required as a school such as mandated child abuse reporting or first aid/CPR.</p> <p>Workshop or conference that is not related to a sustainable series of professional development activities for a specific need.</p> <p>Paying staff with Title II funds to attend professional development activities during contract hours.</p> <p>Substitutes for teachers attending professional learning paid with state or local funds.</p>

Type of Cost	Eligible Activities/Expenditures	Non-Eligible Activities/Expenditures
	<p>PLC meetings focused on professional development for staff outside of normal contract hours [185].</p> <p>Salaries for Academic/Instructional Coaches [140].</p> <p>Teacher stipends for time outside normal scheduled hours to</p> <ul style="list-style-type: none"> participate in professional learning activities; or lead or participate in trainings that improve content knowledge or classroom practice [185]. <p>Salaries for substitutes for teachers, principals, or other school leaders to attend Title II funded professional learning [185].</p>	<p>Developing and implementing standards, standards alignment, and assessments.</p> <p>Basic training to implement a curriculum.</p> <p>Curriculum mapping or curriculum writing.</p> <p>Purchase of any curriculum materials for students.</p> <p>Payments for tutors.</p> <p>Training exclusively for non-instructional staff.</p>
Instructional Paraprofessionals	<p>Training on how to support evidence-based student instruction in reading, writing and math [303 or 366].</p> <p>Cost of ParaEducator Online or ParaPro assessment to work as an instructional paraprofessional in a Title I program [389].</p> <p>Stipends for instructional paraprofessionals to attend training outside of normal scheduled hours [185].</p>	<p>Wages for paraprofessionals.</p>
Fringe Benefits (for district employees)	<p>Reasonable benefits associated with allowable salaries and wages for Title II funded activities [200 series].</p>	<p>Benefit costs only or benefits not consistent with similar work paid with non-federal funds.</p>
Contracted Services	<p>Cost of consultant fee and reasonable expenses to provide professional learning [303/304] to:</p> <ul style="list-style-type: none"> identify and address academic and nonacademic student needs. improve content knowledge or classroom practice. 	<p>Consultant to provide required training such as first aid and child abuse reporting.</p>

Type of Cost	Eligible Activities/Expenditures	Non-Eligible Activities/Expenditures
Supplies and Materials	<p>Cost of materials, supplies and printing/copying for Title II funded activities [401 or 430].</p> <p>Books to support an ongoing professional development book study [430].</p>	Supplies and materials to be used by students or not directly related to a Title II funded professional learning activity.
Technology	<p>Purchases or licenses for software used for continuous professional development [406].</p> <p>Portion of software or digital content necessary for Title II funded professional learning activity [455].</p> <p>Training for the effective use of technology (though use of Title IV, Part A/433 funds is more appropriate) [303, 366 or 368].</p>	<p>Computers or other devices unless approved by MDE Grant Program Specialist or MDE ESEA Supervisor.</p> <p>Purchases or licenses for software not used for continuous professional development.</p>
Travel Expenses	<p>Reasonable expenses for an allowable Title II activity including hotel costs, meal and mileage reimbursements that adhere to state and federal travel guidelines [366].</p> <p>Reasonable cost of out-of-state travel with prior written approval in grant application or email from the MDE Grant Program Specialist or MDE ESEA Supervisor [368].</p>	Out-of-state travel when similar professional development is available in Minnesota.
Other Costs	<p>Professional learning memberships or subscriptions [820].</p> <p>Space rental for professional learning activities [303].</p> <p>Cost to develop or improve a rigorous, transparent, and fair evaluation and support system for teachers, principals, or other school leaders that is based, in part, on evidence of student achievement [303/304 or 185].</p> <p>Cost of a working lunch if (a.) it's associated with an allowable Title II event, (b.) there's no reasonable alternative for participants to buy their own lunch, and (c.) MDE has issued written approval prior to the event [490].</p>	<p>Using Title II for activities required by Q Comp or other state grants.</p> <p>Meals and refreshments except MDE-approved working lunch.</p> <p>Promotional items such as T-shirts, caps, tote bags, imprinted pens and keychains, souvenirs, incentives.</p> <p>Fundraising, raffles, prizes, gifts, and awards.</p> <p>Social events, entertainment, etc.</p> <p>Networking without structure related to specific professional development.</p>

Type of Cost	Eligible Activities/Expenditures	Non-Eligible Activities/Expenditures
<p>Tuition Assistance</p> <p>Use of federal funds for college credits requires a written agreement with the employee or an LEA plan.</p>	<p>Reimbursement of the pre-approved cost for earned college credits related to improving educator effectiveness and consistent with a written LEA plan or agreement [389].</p> <p>Partial or full scholarship for college credits based on economic hardship consistent with a written LEA plan or agreement [389].</p> <p>(See Guidance for Incentive Compensation Agreements for more details.)</p>	<p>Cost of college credits to obtain a teaching license, graduate degree or administrative license.</p>
<p>Nonpublic Services</p>	<p>LEA agreement with consultant for allowable professional development (See Contracted Services) [303].</p> <p>The secular portion of registration costs for a pre-approved conference or workshop (related to allowable, sustained professional development) paid directly to the training vendor or as reimbursement to nonpublic school instructional professionals who participated. (Documentation of attended activities should support the secular share of total cost.) [303]</p> <p>Payment to non-public staff to participate in professional development outside of normal contract hours [303] if paid as a stipend, 185 if paid as temporary LEA employee].</p> <p>Reimbursement of the pre-approved cost for earned college credits related to improving educator effectiveness and consistent with the LEA policy and practices [389].</p> <p>Supplies, materials and subscriptions used strictly for secular professional learning such as books used for a continuous book study to change teaching practices in the classroom or instructional resources [401 or 430].</p>	<p>Direct payment to a nonpublic school.</p> <p>Salaries, stipends, and substitutes for nonpublic school staff during a regular school day.</p> <p>Activities required in teacher employment agreement.</p> <p>Textbooks, software, technology for nonpublic staff or students.</p> <p>Activities that are not secular, neutral and non-ideological.</p> <p>Materials, supplies and subscriptions that are not fully secular, neutral and non-ideological.</p> <p>Activities without prior authorization by the LEA.</p>

Class Size Reduction

Title II should not be used to supplant state and local responsibility and funding for class sizes that are appropriate for general education. Title II may be used to address an unanticipated increase in grade level enrollment. It should not be used to follow the higher enrollment into subsequent grades.

Research on class size reduction is not conclusive but evidence suggests that academic gains occur when primary grades are reduced to fewer than 15 students particularly to serve minority and low-income students.

Any class size reduction should also include appropriate professional development for the teachers who will carry out the program and make the changes necessary to optimize the benefit of a smaller classroom configuration.

Class Size Reduction Activities

Includes the appropriate object code in bold for each activity.

Type of Cost	Eligible Activities/Expenditures	Non-Eligible Activities/Expenditures
Instructional / Professional Staff	Salary [140] and benefits [200 series] for a teacher who is fully licensed for the additional classroom or co-teaching during core academic subjects such as reading or math.	Not allowable for nonpublic services. Wages for paraprofessionals.

Administrative

Direct administrative costs should not exceed five percent of the grant award. Compensation for actual worktime necessary to support Title II activities is allowable if it does not supplant a work schedule that would still exist in the absence of federal funds.

Administrative Activities

Includes the appropriate object code in bold for each activity.

Type of Cost	Eligible Activities/Expenditures	Non-Eligible Activities/Expenditures
Administration	Completing the funding application and administering the funds [110, 140 or 143] .	Compensation for the LEA chief executive or school principal unless paid in addition to regular contract. Consultant to complete grant application or administer the grant.

Indirect Cost

The LEA indirect cost rate may not exceed the approved restricted rate.

REAP Flex or Alternative Use Authority

An LEA that is eligible for the Small, Rural School Achievement Program (SRSA) is allowed to use all or part of its Title II, Part A funds for activities that are authorized under Title I, Part A, Title III or Title IV, Parts A and B. This is distinct from the allowable option to transfer of all or part of the Title II allocation to other Title funds.

Title II Advisory Committee Members

This document was updated during the winter of 2022 with the assistance of the Title II Advisory Committee members from the following organizations:

North St. Paul-Maplewood Oakdale Public School District 0622

St. Cloud Public School District 0742

Waseca Public School District 0829

St. Louis County School District 2142

Saint Paul Conservatory for Performing Artists 4112

Cyber Village Academy 4025

The Anton Group – Public School Accounting