

**MEMORANDUM**

**TO:** Title I, A Program Administrators

**FROM:** Nathan Williamson  
Director of Title Grants & Support

**DATE:** July 1, 2018

**SUBJECT:** Use of Title II funding for professional development for nonpublic teachers

**1. What are some of the eligible activities under Title II, Part A funds in which private school teachers and other educational personnel may participate?**

As with any activity that the LEA 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 of the core academic 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 limited English proficiency, and high ability 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.

**2. How does the LEA ensure that it is providing equitable services?**

To ensure that it is providing equitable professional development services to private school teachers and other educational personnel, the LEA should consider ways to:

- Assess, address, and evaluate the needs and progress of both public and private school teachers;
- Spend an equal amount of funds per student to serve the needs of public and private school teachers and their students;

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- Provide private school teachers with an opportunity to participate in Title II activities equivalent to the opportunity provided public school teachers; and
- Offer educational services to private school teachers that are secular, neutral, and non-ideological [Section 8501].

**3. May Title II, Part A funds be used to pay for a private school teacher's attendance at a professional conference sponsored or conducted by a faith-based organization?**

Yes. To the extent that the conference is part of a sustained and comprehensive secular professional development plan for the teacher, then Title II, Part A funds may be expended to pay for the portion of the costs of the conference that, as determined by the LEA, represent the secular PD in which the teacher participated. In this case, the LEA would pay or reimburse the teacher for attendance at the conference. Eligible costs include a proportionate share of the registration, hotel, mileage/airfare, etc.

During consultation, the private school officials may bring the respective conference's agenda (or a previous year), which includes the listing of workshops. After reviewing these documents and determining which sessions the private school officials will attend, LEAs will determine a percentage to be paid based on the extent of seminars that are not strictly religious in nature (such as Bible, chapel, or missions seminars) and align to the Title II, A plan.

**4. How should the LEA pay for the cost of attendance?**

The LEA remains in control of the funds. The LEA may wish to reimburse the individual(s) for the costs or pay for the costs directly. Please be aware that the LEA cannot reimburse a school.

**5. How early and in what detail should a nonpublic school request Title IIA funding for a professional development conference?**

It is important that consultation occur prior to the submission of the corporation's Title IIA grant application to the Department. As required by ESSA, Title IIA funded professional development must be evidence/research based. It is also expected that the professional development is intended to improve student achievement. During consultation, the nonpublic school representative should convey how any professional development requests meet the requirements of ESSA and the school's improvement planning needs. While many conference agendas may not be available at the time of the consultation, the nonpublic school representative must demonstrate how a particular conference will address the school's professional development priorities in core subject areas (e.g. topics and areas of focus) while also providing estimated costs. Once conference materials have been published, a more detailed proposal which includes sessions/topic to be attended as well as a more accurate budget must be forwarded to the LEA.