

# North Dakota Department of Public Instruction

## TITLE I FAST FACT SERIES

### Issue: Use of Title I Funds (including programs under Title I)

The purpose of this document is to provide guidance on the allowable use of funds for various Title I expenditures.

- **PowerSchool** – During the 2009 Legislative session, language was incorporated into the century code requiring schools to utilize PowerSchool as its principle student information system (NDCC 15.1-07-33). Since state law now requires this program for all schools and students K-12, it is considered supplanting to use federal funds to pay for the PowerSchool program. Further guidance regarding the use of Title I funds for this issue is available at [www.dpi.state.nd.us/title1/targeted/general/facts/data.pdf](http://www.dpi.state.nd.us/title1/targeted/general/facts/data.pdf).
- **NWEA Measures of Academic Progress (MAP)** – During the 2009 Legislative session, language was incorporated into the century code requiring schools to annually administer the NWEA Measures of Academic Progress to grades 2-10 (NDCC 15.1-21-17). Since state law now requires this assessment for all schools, it is considered supplanting to use federal funds to pay for the NWEA assessment. Further guidance regarding the use of Title I funds for this issue is available at [www.dpi.state.nd.us/title1/targeted/general/facts/data.pdf](http://www.dpi.state.nd.us/title1/targeted/general/facts/data.pdf).
- **Gift Cards** – Gift cards are never an allowable expense, as there is no guarantee the card will be used on educationally-related purchases. This includes gift cards issued as door prizes, gift cards issued to teachers for supplies, or Apple gift cards to download software on iPads, to name a few. The only exception to this would be a gift card that is to a bookstore that is also reasonable and nominal. Further guidance regarding the use of Title I funds for this issue is available at [www.dpi.state.nd.us/title1/resource/ipad.pdf](http://www.dpi.state.nd.us/title1/resource/ipad.pdf).
- **Core Curriculum** – Using Title I funds to purchase core instructional materials is not allowed as it is considered a district responsibility to provide these items (math curriculum, spelling books, etc.). Even in schoolwide programs, Title I funds must supplement state dollars and purchasing core curriculum is not allowed. Further guidance regarding the use of Title I funds for this issue is available at [www.dpi.state.nd.us/title1/targeted/general/facts/fiscal.pdf](http://www.dpi.state.nd.us/title1/targeted/general/facts/fiscal.pdf).
- **Furniture** – We have learned from the U.S. Department of Education that it is an inappropriate use of federal funds to purchase classroom furniture. Permanent fixtures that are needed to operate a classroom (tables, desks, chairs, etc.) are the responsibility of the district; therefore, using federal funds for these items would be supplanting. However, districts may purchase supplemental items such as filing cabinets, book shelves, computer tables, etc. Further guidance regarding the use of Title I funds for this issue is available at [www.dpi.state.nd.us/title1/targeted/general/facts/furniture.pdf](http://www.dpi.state.nd.us/title1/targeted/general/facts/furniture.pdf).
- **Incentives** – Although using Title I funds for incentives is rather vague in the federal law, federal guidance has been issued on this topic and indicates that it may be allowable if the expenditures can pass each of the following three tests:
  - **Reasonability Test:** All expenditures using Title I funds must be reasonable. It helps to determine if the expenditure is reasonable by picturing the district having to justify an expenditure to an auditor.
  - **Nominal Test:** Expenditures for incentives should be small rewards that reflect a minimal portion of the total Title I funds available.
  - **Educationally-Related Test:** Incentives purchased with Title I funds should be educationally related, such as books or educational games. When distributing incentives, the rationale must also be educationally related (regularly attending school, finishing a project, etc.).

Further guidance regarding the use of Title I funds for this issue is available at [www.dpi.state.nd.us/title1/targeted/general/facts/incentives.pdf](http://www.dpi.state.nd.us/title1/targeted/general/facts/incentives.pdf).

- **P.E. Equipment** – Using Title I funds for P.E. equipment, such as a treadmill, is not an allowable use of Title I funds. Even if it is a schoolwide program, the expenditures must be focused on raising achievement. Although we certainly encourage coordination, any Title I expenditure supporting school health in a schoolwide program would need to coordinate academics and health.
- **Field Trips** – Field trips may be allowable, but must be educationally related and the costs to attend should be reasonable. Resort or vacation areas (water parks, amusement parks, etc.) are not allowable as the issue of the academic nature of the visit comes into play. Using funds to pay for multiple chaperones with a minimal number of students participating would be an example of an unreasonable use of funds.

In some instances, supplemental materials or services to support the above items may be approvable. A school's targeted assistance or schoolwide Title I status plays a great role when determining whether these items are allowable.

In summary, ALL Title I funds (including programs under Title I) must be used for expenditures that are supplemental, reasonable, and necessary to operate a Title I program. Districts must keep focused on the ultimate goal, which is enhancing student achievement.

If you have questions regarding this issue, please contact:

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