

## FREQUENTLY-ASKED QUESTIONS

### Allowable Use of Title III, Part A Funds

<b>Administrative Costs</b>
<p><b>1. Is it allowable to use Title III funds to pay for administrative costs?</b></p> <p>Yes, it is allowable to use Title III funds to pay for administrative costs to implement the Title III program. However the amount of Title III funds which may be used to pay administrative costs to implement the program must not exceed 2% of the program's budget amount. In calculating total administrative costs subject to the 2% limit, all appropriate indirect and direct costs, such as administrative salaries, must be included. If the local education agency (LEA) contracts with an outside vendor to provide Title III services, the LEA must require that the contractor break out administrative costs, which are included within the 2% limit, as well.</p>
<b>Bilingual/ESL Certification</b>
<p><b>2. Is it allowable to use Title III funds to pay for ESL certification training, testing, or stipends to attend the training if the purpose is to build capacity in order to be able to provide content-based ESL, rather than ESL pull-out instruction; the LEA feels this is going above and beyond what would meet state requirements by opting to provide higher-quality instruction.</b></p> <p>This is allowable if the LEA is meeting state requirements to provide ESL but wishes to improve the ESL program by paying for more teachers to be ESL-certified. However, this is only allowable provided that the efforts are above and beyond what is required under state policy. For example, Title III funds may not go towards meeting the state-required use of 10% of the state bilingual education allotment (BEA) for training if the LEA has been approved for a bilingual exception or ESL waiver.</p>
<b>Bonuses</b>
<p><b>3. Is it allowable to use Title III funds to pay teachers a bilingual/ESL bonus (sometimes referred to as a signing bonus, annual bonus, or stipend) for being bilingual/ESL-certified?</b></p> <p>This is not allowable as, even in the absence of Title III funding, LEAs are required to hire appropriately certified teachers required under state policy to serve their English language learners (ELLs) and, thus, providing the bonus or stipend to secure these teachers would not be supplemental.</p>

Professional Development/Training
<p><b>4. Can Title III funds be used to support sending teachers to training on the English Language Proficiency Standards (ELPS) by paying for substitute teachers or a stipend for training held on Saturday or after school)?</b></p> <p>Whether this is allowable depends on the following:</p> <ul style="list-style-type: none"> <li>• Purpose for Attending – If the training is required (for example, by the district for those with certain teaching placements, etc.), then this is NOT allowable;</li> <li>• Funding of Training – If funded through a source (such as a State grant, etc.) that could provide for this, then it is NOT allowable; and</li> <li>• All Other Supporting Conditions – If it is not to meet a requirement and no other funding source is available for it, this is allowable as long as all other supporting conditions are met (reflected in application, necessary and reasonable, the teachers are serving LEP students, etc.).</li> </ul>
<p><b>5. Can Title III funds be used to support sending a teacher to Sheltered Instruction training by paying for a substitute teacher or a stipend for training held on Saturday or after school)?</b></p> <p>This is allowable as long as it is not required by local policy (for certain teaching assignments, etc.) and all other supporting conditions are met (e.g., reflected in the application, necessary and reasonable, the teachers are serving LEP students, etc.).</p>
<p><b>6. Can Title III funds be used to support sending a teacher to training on the Texas English Language Proficiency Assessment System (TELPAS) by paying for a substitute teacher or a stipend for training held on Saturday or after school)?</b></p> <p>This is NOT allowable since the state policy requires administration of the TELPAS and training is required in order to administer it.</p>
<p><b>7. Can Title III funds be used to send a teacher to a conference such as a conference on dual language, TESOL, TABE, etc., including paying for a substitute teacher?</b></p> <p>This is allowable as long as all other supporting conditions are met (e.g., it is reflected in the application, it is determined to be necessary and reasonable, the teachers are serving LEP students, etc.).</p>

Stipends	
<p><b>8. Can Title III funds be used to pay for teachers to get ESL-certified?</b></p>	<p>This would be allowable, provided that the LEA's efforts are above and beyond what is required under state policy. For example, Title III funds may not go towards meeting the state-required use of 10% of the state bilingual education allotment (BEA) for training if the LEA has been approved for a bilingual exception or ESL waiver.</p>
<p><b>9. Can Title III funds be used to pay stipends for staff to attend professional development?</b></p>	<p>This is allowable provided that the professional development or training is not required under state policy (in other words, as long as the training is supplemental; also must meet all other supporting conditions, such as necessary and reasonable, etc.).</p>
<p><b>10. Can Title III funds be used to pay stipends as extra duty pay for staff to carryout Title III-specific activities?</b></p>	<p>Use of the term, extra-duty pay, typically refers to payment to staff already paid through the same program in question. As long as the activity is Title III-specific and supplemental (and meets all other supporting conditions, such as necessary and reasonable, etc.), it is allowable.</p>
<p><b>11. Can Title III funds be used to pay a stipend for a teacher for having obtained Bilingual or ESL certification?</b></p>	<p>This is NOT allowable if the certification meets a state requirement for teachers assigned to teach English language learners.</p>
<p><b>12. Can Title III funds be used to pay a stipends or bonuses to teachers based on the teachers having bilingual/ESL certification?</b></p>	<p>It is not allowable to use Title III funds to pay bonuses or stipends based on teachers having bilingual/ESL certification, as securing the certified teacher meets a state requirement for teachers assigned to teach English language learners.</p>