

Allowable Uses of Title II, Part A Funds for Private Schools

Since the passage of the Elementary and Secondary Act (ESEA) in 1965, school districts have been required to provide equitable services to private school students, teachers, and in some cases, other educational personnel, and parents under several federal programs. Title II, Part A issues this information to provide guidance for private school and district participation in ESSA federal programs.¹ In general, Title II, Part A funds are provided to state education departments which then subgrant to school districts to strengthen the quality and effectiveness of teachers, principals, and other school leaders.

Private School Responsibilities

To participate in any federal program, a private school must notify the Office of Superintendent of Public Instruction (OSPI) and the local school district of their intent to participate each year. Private schools must complete their intent to participate via the *Private Participation in Federal Programs* application in the Education Data System (EDS). The application opens March 15 and is due April 15 each year.

School District Responsibilities

School districts must make initial contact with all private schools located in their boundaries to ensure they complete the *Private Participation in Federal Programs* application in EDS. Districts must provide “timely and meaningful” consultation with appropriate private school officials.² It is not sufficient to invite private schools to participate in the LEA’s professional learning.

Purpose of Title II, Part A

- Increase student achievement consistent with challenging the state academic standards.
- Improve the quality and effectiveness of teachers, principals, and other school leaders.
- Increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools.
- Provide students from low-income families and students of color greater access to effective teachers, principals, and other school leaders.

¹ [ESSA Section 8501](#)

² [ESSA Section 1117\(a\)\(1\)\(A\) and \(b\)](#) and [ESSA Section 8501\(c\)\(1\)](#)



No matter what choice is made about how services and materials should be delivered, the district remains in charge of the funds:

- District monitors teachers and providers who deliver services.
- District maintains administrative control over services.
- Districts do not distribute public funds to private schools.

Services for private schools begin at the same time as services begin in public schools. Funds allocated to a private school must be obligated in the same fiscal year the school district received the funds. See below for carryover requirements.

Allowable Activities

Line Item	Eligible Activities and Expenditures	Non-Eligible Activities and Expenditures
Salaries	<ul style="list-style-type: none"> • Salaries for certified teachers hired by the school district to offer services to the private school (hiring must be based on the needs of the private school) 	<ul style="list-style-type: none"> • Private school teacher's salary • Substitute teacher's salary
Benefits	<ul style="list-style-type: none"> • Not allowable 	<ul style="list-style-type: none"> • Funds are not allowable for non-public personnel's benefits
Stipends	<ul style="list-style-type: none"> • Stipends if reasonable and necessary to the grant • Stipends may be used for professional development offered after school or during the summer to compensate teachers 	<ul style="list-style-type: none"> • Stipends must not be paid to the private school or be for the benefit of the private school
Substitutes	<ul style="list-style-type: none"> • Not allowable 	<ul style="list-style-type: none"> • Funds are not allowable for substitute teachers

Line Item	Eligible Activities and Expenditures	Non-Eligible Activities and Expenditures
Supplies/Materials	<ul style="list-style-type: none"> The school district ensures services, materials, and equipment are secular, neutral, and non-ideological¹ Supplies or materials are to be used strictly for professional development such as books or instructional resources 	<ul style="list-style-type: none"> Supplies to be used in the classroom by students Materials must be supplemental and must not supplant what the private school would otherwise provide in the absence of federal funds The school district must collect when the private school no longer needs the items
Equipment	<ul style="list-style-type: none"> The school district may place equipment in a private school for the period needed for the program and only for that program 	<ul style="list-style-type: none"> Equipment must be returned to the school district when no longer needed
Workshops, classes, conference registrations, contracted services for professional learning providers	<ul style="list-style-type: none"> Funds may be used as part of an approved professional learning plan (can include in-person, hybrid, or online learning models) School district professional development activities may be open to private school staff Clock hours when educators attend a training, even if this results in an additional fee Tuition for courses in a state-approved teacher or state-approved principal preparation program Tuition for courses in a state-approved add-on endorsement program Fees for endorsement testing 	<ul style="list-style-type: none"> Funds for faith-based trainings are not allowed; see the row below for details

¹ ESSA Sec. 1117(a)(2), 8501(a)(2)

Line Item	Eligible Activities and Expenditures	Non-Eligible Activities and Expenditures
Faith-based trainings	<ul style="list-style-type: none"> Title II, Part A funds may be expended to pay for the portion of the costs of a conference that, as determined by the school district, represents the secular professional development in which the teacher participates 	<ul style="list-style-type: none"> A percentage of faith-based offerings may be determined and subtracted from the costs of the conference Registrations must be pre-approved by the school district to determine the faith-based percentage
Travel	<ul style="list-style-type: none"> The school district may reimburse a private school teacher or school administrator for pre-approved professional development expenditures (mileage, meals, and hotel costs) Conference registration is paid through the school district's regular process 	<ul style="list-style-type: none"> Federal funds may never be paid directly to a private school Only the school district may obligate and expend federal funds on behalf of private school students and teachers Federal funds may never be used for food or refreshments (including working lunches)

Resources

- [Private School Participation in Federal Programs](#)
- [Non-Regulatory Guidance, Title IX, Part E](#)–March 2009
- [Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements](#)–November 2016

Contacts

- [Title II, Part A](#), 360-725-6340
- OSPI [Private School Ombuds](#), 360-726-6100