Oklahoma State Department of Education  
2500 North Lincoln Boulevard  
Oklahoma City, Oklahoma 73105-4599

Office of Federal Programs  
Ramona J. Coats  
Assistant State Superintendent  
Title I, IIA, VI and X, Bilingual/Migrant, and Child Nutrition Programs

Oklahoma Policy  
What Professional Development Can Be Funded With Title IIA Funds?  
ESEA Title II, Part A, Improving Teacher and Principal Quality

The Oklahoma State Department of Education provides written policy for those local education agencies eligible to receive funding according to principles outlined in the Title II, Part A, (Section 2101 Statute), Improving Teacher and Principal Quality program guidelines.

Purpose of Title II, Part A:

The purpose of Title II, Part A, is to provide federal dollars to State educational agencies, local education agencies, State agencies for higher education, and eligible partnerships in order to perform the following:

1) To increase student academic achievement through strategies such as improving teacher and principal quality, and increasing the number of highly qualified teachers in the classroom and also the number of highly qualified principals and assistant principals in schools; and

2) To hold local education agencies and schools accountable for improvement in student academic achievement. Title II (20 U.S.C. 6601) Amended Section 2101 -Statute

Key to understanding Title II, Part A, is to know that funds made available under this section shall be used to supplement, and not supplant, State and local public funds expended for teacher recruitment and retention programs, including programs to recruit teachers through alternative routes to certification. Title II (2313) (2) Supplement, Not Supplant – Statute

Title II, Part A Program Targets:

Eligible recipients of Title II, Part A funds, after performing a thorough review of district needs and have completed the required needs assessment document, should target the following issues when making application of the use of these funds: (Improving Teacher Quality State Grants Non-Regulatory Guidance, Appendix B, Section 2102)

- **Arts and Sciences**: Consider each of the academic content areas.
- **Charter Schools**: Charter school that have been classified as local education agencies are now eligible to participate in receiving Title II, Part A program fund.
- **High-Need Local Education Agency**: This type of education agency must serve not fewer than 10,000 children from low-income families, or not less than 20% of the children served are from families below the poverty line, high percentage of teachers not
teaching in the academic subjects or grade levels the teachers were trained to teach, or where there is a high percentage of teachers with emergency or provisional certification.

- **Highly Qualified Paraprofessional**: All paraprofessionals must be highly qualified at the time of hire.
- **Out-of-Field Teacher**: This is a teacher who is teaching an academic subject or a grade level for which the teacher is not highly qualified.
- **Principal**: This may also include the assistant principals as instructional leaders of a school.

### Appropriate Uses of Title II, Part A Funds:

Title II, Part A funds must be utilized for providing scientifically research based methods for teachers and principals when planning for professional development.

Eligible agencies participating in receiving Title II, Part A federal funds, after implementing the district needs assessment, should take a strong look at providing effective teacher training opportunities that are scientifically researched based and well aligned to the district needs assessment. This is the beginning of creating and implementing an effective Title II, Part A plan.

It is important to invest in professional development that will provide teachers with supportive training experiences that will not only deepen their content knowledge of subject matter, but will also enable them to deliver a broader view of content presented. Professional development should be ongoing, sustained, and designed to create a culture of continued learning and improvement, and a culture where teachers become ‘masters’ of the content they are required to present.

Principals, in like manner, should be highly engaged in professional development in order to become effective instructional leaders. Principals should be encouraged to participate in professional development training in that the whole crux of the matter is for the ultimate purpose of creating thriving classrooms for learners.

When teachers and principals have been trained by the experts, the results will be demonstrated by observing students as they engage in higher level cognitive activities, increase their scores on academic assessments, and become well prepared for the college or career of their choice.

When all is said and done, a strong commitment to professionalism among teachers and principals will become quite evident.

### The Oklahoma State Department of Education approves the following professional development activities for the use of Title II, Part A funds:

- National Grade Level Conferences
- National Middle School Principals’ Conferences
- International Reading Association
- Great Expectations
- Professional Learning Communities
- OPAT: Oklahoma Parents as Teachers, State sponsored
- COSSA: State Sponsored, larger conferences such as, summer and spring
- COSSA: Leadership conference for principals
- Dibels Training: Reading Assessment
- Love and Logic: Effective Discipline Strategies
- Ag in the Classroom: State Sponsored
- Association for Secondary School Principals
- Core Content Conferences: State sponsored; example, Common Core Integration into the Curriculum - Topics for Reading, Math, and STEM
- Curriculum Alignment Trainings: State sponsored, aligning district curriculum to Common Core State Standards
- Data Driven Decision Making: Unwrapping the Data
- Common Core State Standards: How to Make a Successful Transition from PASS to Common Core
- CCSS Benchmark Objectives: How to Incorporate the Common Core State Standards Benchmark Objectives into the Curriculum
- Teacher/Leader Effectiveness Trainings: Preparing Teachers to Understand Effective Methods of Delivering Instruction
- Teacher Instructional Strategies: Professional development addressing high-risk students and methods for delivering instruction
- Differentiated Instruction: Conferences addressing high-risk students
- Student Learning Styles: Conferences addressing learning modalities
- Student Behavior Issues: Conferences that provide information on identifying early and appropriate interventions
- Technology Conferences: Conferences addressing effective methods for technology inclusion in the classroom

The Oklahoma State Department of Education may approve the following conference due to the nature and content included in this conference:

- State Superintendent’s Leadership Conference: Vision 2020

This conference will be approved for FY2012 for the use of Title II, Part A funds. The United States Department of Education provided the Oklahoma State Department the following guidance:

*Generally, the question of whether you may approve, or disapprove, LEA requests to use Title II, Part A funds to travel to the annual conference described, depends on the SEA’s judgment concerning its allowability under federal cost principles. SEA’s must be mindful of the cost principles that apply to the use of federal funds. One such principle is in the OMB Circular A-87, attachment B, Selected Item 27 (now codified at 2 CFR 225), which states as a permissible use of funds the following:*

27: Meetings and Conferences: Costs of meeting and conferences, the primary purpose of which is the dissemination of technical information, are allowable. This includes the costs of meals, transportation, rental of facilities, speakers’ fees, and other items incidental to such meetings or conferences. But see Attachment B, section 14, Entertainment costs.

Under this principle, the SEA is expected to determine if the conference at issue here has the “primary purpose” of conveying technical information about how each LEA can better implement its Title II Part A, funded activities.

Similarly, other general cost principles, applicable to all federal funds, apply. Before approving LEA requests for funding requests under Title IIA, SEAs should be satisfied that the costs are “reasonable and necessary.” In this case, the conference costs should be reasonable and necessary for implementing each LEA’s Title IIA plan.
In sum, federal law and regulation expects an SEA to assess whether these basic cost principles are being followed as it reviews and approves LEA requests for Title IIA funds each year. If the SEA determines, based on its knowledge of the conference content, and each LEA’s Title IIA needs and plans, that the conference-attendance costs conform to these basic cost principles, then it should be approved. If the SEA determines that the conference costs cannot be justified under these important principles, the SEA is under no obligation to approve the requests.

There is also the matter of supplement, not supplant regarding the use of Title IIA funds and the State Superintendent’s Vision 2020 Conference. If districts have used State and local funds in the past to cover the cost of this conference, and then requests to use Title II Part A funds to cover the cost for FY2012, then this would become an issue involving supplanting.

* Information submitted by: Michelle Meir, Title IIA Program Contact Official, USDE