

Issue Date: May 24, 2024

# Professional Development for “Other School Leaders” Using Title II, Part A

## Use of this Document

This document is to be used as a guide for the use of Title II, Part A funds for professional development for staff members other than teachers, principals, and assistant principals and to provide guidance on the definition of “other school leaders” under ESEA.

## Definition of “School Leader” Under ESEA

According to ESEA §8101(A)(44):

“The term ‘school leader’ means a principal, assistant principal, or other individual who is—

- (A) an employee or officer of an elementary school or secondary school, local education agency, or other entity operating an elementary school or secondary school; and
- (B) responsible for the daily instructional leadership and managerial operations in the elementary school or secondary school building.”

## Intents of Title II, Part A

In general, Title II, Part A funds can be used to provide supplemental activities that strengthen the quality and effectiveness of teachers, principals, and other school leaders.

The intents of Title II, Part A are to:

- Increase student achievement consistent with state 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; and
- Provide low-income and minority students greater access to effective teachers, principals, and other school leaders



## General Considerations

These funds can be used for a wide range of activities to support the quality and effectiveness of teachers, principals, and other school leaders. However, programs and activities supported with Title II funds must:

- Be consistent with Title IIA's purpose (see above);
- Be necessary, addressing identified statewide needs, supported by local and state level data;
- Be reasonable, considering breadth of impact and associated costs
- Address the learning needs of all students, including children with disabilities, English Learners (ELs), and gifted and talented students;
- Be used for evidence-based activities;
- Be utilized to supplement local and state funds, not supplant them;
- Be coordinated with other available funds and resources to maximize the effectiveness and efficiency of spending; and
- Provide a direct benefit to teachers, school leaders, and principals.

## Allowable vs. Unallowable Staff

Title II, Part A funds may be used to pay for the professional development of teachers, principals, and other school leaders as defined in ESEA §8101(A)(44). Two important considerations that may be helpful in determining if an individual meets the ESEA definition of "other school leader" are:

- If the individual is directly involved in the day-to-day instructional process; and
- If their work is performed physically within an elementary or secondary school.

The lists below outlines which individuals may or may not receive professional development funded by Title II, Part A:

### Allowable:

Principals  
Assistant Principals  
Teachers  
Academic Coaches  
Teacher Leaders

### Not Allowable:

Guidance Counselors\*  
Superintendents  
Administrative Staff  
Curriculum Directors\*\*  
Nurses  
Bus Drivers

Custodians  
Paraprofessionals\*\*\*  
School Board Personnel

\*Unless providing instruction, then costs may be prorated as in Example 3 below

\*\*Except for the portion of time spent providing direct professional development to staff in the “allowable” list

\*\*\*Except for professional development on the identifying and preventing child sexual abuse

## Pro-rating Professional Development Costs

Some professional development provided at a school, district or LEA level may involve both teachers, principals and other school leaders whose professional development may be funded under Title II, Part A and individuals whose professional development would not be an allowable use of these funds.

If the professional development is a flat fee, such as a consultancy fee, without regard to the number of participants, the entire fee may be charged to Title II, Part A funds provided that a majority of the staff participating are allowable staff as defined in this document; in this case it is important to maintain an attendance log for participants including their job titles.

### Example 1:

A consultant is coming to provide professional development to the entire LEA’s staff on trauma-informed instructional practices. The consultant is contracted \$2,000 for the day without limitation on the number of participants. If a majority of participants are allowable staff under Title II, Part A, then the \$2,000 consultant fee may be allocated to Title II, Part A funds.

Alternately, if the professional development is charged per-participant or based on the number of participants, only the costs for the professional development for allowable staff under Title II, Part A as defined in this document may be charged to Title IIA.

### Example 2:

There are 100 staff attending LEA-wide professional development on an in-service day with a registration cost of \$100 per person, for a total of \$10,000. Of the 100 staff, 87 are allowable staff under Title II, Part A. Only the \$8,700 in registration costs to cover the 87 allowable staff may be charged to Title II, Part A, and the remaining \$1,300 in registration fees for the remaining 13 staff must be paid for from another funding source.

As many Curriculum Directors, Directors of Learning, etc. may provide regular direct professional development to instructional staff, it is important to keep time and effort logs and charge funds only for the portion of time spent performing allowable Title II, Part A activities. If a portion of this individual’s salary is paid for by Title II, Part A funds, then the equivalent portion of costs of professional development this individual receives that meets the intents of Title II, Part A may also be allocated to Title II, Part A.

**Example 3:**

A Curriculum Director provides school-level coaching directly to instructional staff 4 hours a week. Based on a 40-hour work week, they would be performing allowable Title II, Part A work for 10% or .10 of their time. This means that .10 of their salary and benefits may be charged to Title II, Part A, provided that a time and effort log is maintained that supports actual time spent. This would also mean that 10% of any professional development this individual receives that meets the intents of Title II, Part A may also be charged to Title II, Part A.