

Issue Date: May 11, 2023

Uses of Title I, Part A and Title II, Part A to Address Recruitment and Retention of Effective Educators in VT LEAs

Use of this Document

Vermont schools are facing unprecedented workforce shortages. This document is intended as a guide for the use of Title I, Part A and Title II, Part A funds to support a variety of strategies for recruiting, retaining, and increasing students' access to effective educators. Title I, Part A is addressed first, Title II, Part A second. Although there is significant overlap between the allowable uses for recruitment and retention of effective educators between these two titles, there are also differences that warrant discussing them separately below.

Title I, Part A Recruitment and Retention

The purpose of Title I of the ESEA is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Part A of Title I is focused on improving basic educational programs operated by LEAs. LEAs are able to utilize funding for a variety of strategies that will meet the intents of this Title, including strategies to attract and retain qualified teachers (particularly in high need subject areas) who serve in Title I, Part A funded programs. Workforce development strategies pertaining to recruitment and retention of staff may include but are not limited to:

- Teacher wellness initiatives and other strategies to recruit and retain effective teachers
- Teacher mentoring or coaching opportunities to support new teachers or educators teaching in new endorsement areas (allowed under IIA as well – see below)
- Defraying of costs associated with attainment of initial licensure, additional endorsement, or advanced certification, such as national Board Certification (allowed under IIA as well – see below)
- Hiring and retention bonuses (allowed under IIA as well, see below)
- Financial incentives and rewards to teachers in Comprehensive Support and Improvement (CSI) or Targeted Support and Improvement (TSI) schools (LEAs may reserve up to five percent at the LEA level for this initiative)

The allowability of investments in one or more of these activities will depend on individual circumstances within each LEA (see the Title I, Part A Allowability Considerations section below).



Personnel Eligible for Title I, Part A funded Recruitment and Retention Activities

Eligible personnel in a Title IA schoolwide program:

In a schoolwide program (SWP) all students and staff may participate in Title I-funded activities, and the school may use Title IA funds to support any reasonable activity designed to improve the school's educational program so long as it is consistent with the school's needs and plan. Therefore, in a SWP school, Title IA funded activities that improve recruitment and retention of effective teachers who work with any/all students are allowable.

Eligible personnel in a Title IA targeted assistance program:

A school operating a targeted assistance program (TAP) may only use Title IA funds for activities that support the needs of the school's identified Title I students.¹ Additionally, in a TAP school, only those positions working directly with the Title I caseload of students are eligible for Title IA funded recruitment and retention initiatives.

Title I, Part A Allowability Considerations

Title IA funded recruitment and retention related activities must:

- Be constructed as a means of improving student achievement, especially that of the lowest achieving students.
- Support only educators working with Title I eligible students in Title I-funded schools (including any staff in a SWP school).
- Be used to supplement federal funds. LEAs must use a Title I neutral budget methodology to allocate state and local funds to schools. This budget methodology must provide each Title I school with all state and local money it would receive if it did not participate in the Title I program.
- Address a need identified in the school's comprehensive needs assessment and be articulated in its schoolwide plan.

Title II, Part A Recruitment and Retention

¹ In a TAP, students are eligible and can be selected for Title I services if they: (1) are failing, or at risk of failing, to meet state standards, or (2) participated in certain federally-funded preschool programs within the past two years, or (3) received services under the Migrant Education Program within the past two years, or (4) are in a local institution for neglected or delinquent children or are attending a community day program, or (5) are homeless.

The purpose of Title II, Part A is 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
- Provide low-income and minority students greater access to effective teachers, principals, and other school leaders

The third and fourth purposes are often underinvested in LEAs' Title II, Part A investments. To that end, the following are examples of workforce development strategies that may be funded with Title II, Part A funds. The allowability of investments in one or more of these activities will depend on individual circumstances within each LEA (see the Title II, Part A Allowability Considerations section below).

Professional Educator Credentialing Costs

Costs associated with enabling not-fully-credentialed (e.g., emergency and provisionally licensed) individuals to acquire initial licensure, and existing educators to add additional endorsements, such as Peer Review fees, course credit fees, and fees for programs such as the VT Higher Education Collaborative, etc., are allowable costs under Title II, Part A.

Paraprofessional to Educator Pipeline Costs

Costs associated with enabling experienced and effective paraprofessionals, behavioral interventionists, family liaisons and other related staff to complete undergraduate degrees, if needed, and to acquire full educator credentials are allowable costs under Title II, Part A.

Mentoring/Coaching Activities that are Intended to Improve Retention and Effectiveness of Staff

Cost associated with implementation of new teacher mentoring programs for teachers, including teachers instructing in new endorsement areas, are allowable costs under Title II, Part A.

Hiring or Retention Bonuses that are Intended to Support Recruitment and Improve Retention of Staff

Cost associated with implementation of hiring and/or retention bonuses are allowable costs under Title II, Part A.

Title II, Part A Allowability Considerations

- Generally, fees for initial licensure (except as mentioned above) and licensure renewal may not be paid with Title II, Part A funding since license acquisition and renewal are not directly associated with increases in educator effectiveness and such activities are required under state law. LEAs may choose to use local funds to support educators with these costs. The same applies to Title I, Part A funds.
- In accordance with, the necessary and reasonable cost principle within the Uniform Grants Guidance, the cost of credit hours when an individual is not working toward licensure or an additional endorsement being supported by a Title II A investment (e.g., courses taken for professional development) is generally not allowable unless the cost of such credit hours cannot be separated from the cost of the course. LEAs may choose to use local funds to support educators with the additional cost of such credit hours.
- Supplement, not supplant requirements apply to allowability of specific activities for individual LEAs. An LEA may not use Title funds to pay for a specific activity that is required by state, local or other federal law or that was paid for in the prior year with state or local funds. Importantly, an LEA may overcome a presumption of supplanting if it has written documentation (like budget or other materials) that it does not have the funds necessary to implement the activity and would not carry out the activity absent Title II funds.

General Considerations Regarding Justifying Investments of Title I, Part A and Title II, Part A funds for Recruitment, Retention, and Diversity of Effective Educators

Some questions LEAs may wish to consider when determining whether to use Title I or II funds to support recruitment or retention of educators include:

- How was the need for investments in recruitment and retention of effective educators determined? What data was used?
- What is the connection between investments in recruitment and retention of effective educators and the identified needs of the LEA and schools within the LEA?
- Are licensees chosen for this program expected to work within the endorsement area and/or for the LEA for a specific number of years in order to either receive reimbursement or not have to repay the benefit?
- What will happen if the licensee does not complete the course, Peer Review, pipeline program, etc. and attain the intended licensure?

- How will applicants to the program be chosen? Based upon which criteria? How will staff be made aware of this program?

While not a federal requirement, the Agency recommends LEAs document their use of Title I, Part A and/or Title II, Part A funds for purposes related to recruitment, retention, and diversity of effective educators. Doing so will help demonstrate Uniform Grants Guidance requirements – that activities are necessary, reasonable, and allocable – have been met and will help to justify the expenditures in the case of a monitoring or audit.

Additionally, should an LEA like more information – including a usable template for tracking documentation related to individuals seeking licensure or additional endorsements -- please contact Title II Director, Megan Kinlock, at megan.kinlock@vermont.gov.