



Private School Expenditure Guidance (Title I, Part A) Montana Office of Public Instruction, August 2022

In accordance with the ESEA/ESSA Act of 2015, Section 1117, students who attend private schools are eligible to participate in Title I, Part A programs. To be eligible to receive Title I, Part A services, a student must live in an attendance area with an eligible and participating Title I school and meet certain requirements such as needing academic assistance and meeting income eligibility requirements.

Public schools also run Title I, Part A programs. In Montana, approximately 85-90 percent of all Title I expenditures are for the salaries and benefits of Title I teachers and paraprofessionals. Research shows that direct instruction is the most important key to academic success. The remaining 10-15 percent is then split between supplies for the academic program for eligible students, which can include consumable materials, textbooks, testing supplies, etc., and for professional development for Title I identified staff.

Far too often, many Montana districts are spending an inordinate amount of funds on supplies for the Title I program at the private, non-public schools. Along with this, private, non-public schools are submitting requisitions to the public school for these supplies. *This is not allowable.* The public school runs the Title I program at the private, non-public school, and therefore, it determines what supplies are needed to run the program. The private, non-public school can work with the public school district to determine what is needed, but in the end, it is the public school's responsibility to purchase needed materials. This out-of-proportion spending on supplies is, in general, being used by the private, non-public school to purchase materials for their own curriculum.

In reviewing yearly expenditures across districts with participating private, and non-public schools, the Office of Public Instruction (OPI) has determined that there is an excessive amount of carryover funds from year to year. According to the ESSA, funds for private, non-public schools are to be spent in the year that they were allocated. A general comment sent from districts to the OPI when this happens is, "The private school didn't spend their funds." Private schools have no authority to spend federal funds as Title I dollars must be controlled by the public school. It is the district's responsibility to spend down the funds. If districts spend the preponderance of funds for salaries and benefits, this issue should not arise. Districts are free to determine the salaries and other associated instructional costs to run the Title I program at the private, non-public school. The district should be able to review its costs and set the hours of Title I instruction needed to use the funds effectively at the private, non-public school. This should use most of the available dollars.



Private, non-public schools can also use Title I funds for professional development. Please note that funds cannot be given to the private, non-public school to reimburse any professional development costs that could include per diem, conference registration, hotel, and travel expenses, etc. However, teachers from private, non-public schools can be directly reimbursed by the public school.

Beginning in SY22-23, unless the amount of equitable share funding for a private, non-public school is incredibly low, districts will be required to spend approximately 85-90 percent of Title I funds to directly support instruction to students. This can be in the form of salaries and benefits to teachers or paraprofessionals or in the form of a contract with a third-party provider. The remaining 10-15 percent may then be spent on supplies and professional development.

For further information or clarification, please contact:

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