

## 6 TITLE I 29

108 LRP 39047

**Letter to: Dorreen Borja  
U.S. Department of Education**

N/A

**June 5, 2008**

### **Judge / Administrative Officer**

**Todd Stephenson**

### **Ruling**

Allowable expenditures

Parental involvement

### **Meaning**

Keep refreshments 'light' at parent involvement events

### **Case Summary**

Q. May Title I funds be used to purchase food for a Title I parent involvement event?

A. Maybe, according to this e-mail from federal Title I program analyst Todd Stephenson.

Office of Management and Budget Circular-87 explicitly prohibits the use of federal funds for entertainment, including meals. But Stephenson explains that Title I funds may, within certain parameters, pay for food and drink at parent involvement events.

"We have taken the position that, as a way of encouraging parents of Title I students to participate in school activities, an LEA may use Title I funds to provide light refreshments to the parents."

Stephenson further noted that Title I funds may pay for child care, transportation or other expenses to enable parents to attend school events.

### **Full Text**

#### **Customer**

Is the use of Title I funds for food for parent involvement an allowable expense?

#### **Agency Response**

This is a response to your question about whether using Title I, Part A (Title I) funds for food

for parent involvement is an allowable expense. Although there is not enough information in your e-mail to respond directly to the circumstance in your district, I hope some general information on the use of Title I funds will be helpful.

A local educational agency (LEA) has some flexibility to use Title I funds for various activities that would enhance the academic achievement of at-risk children served under Title I as long as these activities are allowable under the Elementary and Secondary Education Act (ESEA) and meet the general standards and prohibitions established in Office of Management and Budget (OMB) Circular A-87 Cost Principles (OMB Circular A-87). OMB Circular A-87 requires that the use of funds for a specific purpose be necessary and reasonable for the proper and efficient performance and administration of the program and be authorized and not prohibited under State and local laws or regulations. (Please see "Basic Guidelines" in the link below to OMB Circular A-87.) In addition, OMB Circular A-87, Attachment B.14, specifically prohibits the use of Federal funds for entertainment, including "amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities)."

We have taken the position that, as way of encouraging parents of Title I students to participate in school activities, an LEA may use Title I funds to provide light refreshments to the parents. Note also that section 1118(e)(8) of ESEA authorizes LEAs to use Title I funds for parent-related activities such as literacy training under certain circumstances and for reasonable and necessary expenses associated with parental involvement activities, including child care and transportation to enable parents to attend school-related meetings and training sessions.

For assistance with your district's particular situation, please contact the Nevada Department of Education (NDE). Ms. Kathy St. Clair is the Title I Director at NDE, and her e-mail is [kstclair@doe.nv.gov](mailto:kstclair@doe.nv.gov).

Link to ESEA:  
<http://www.ed.gov/policy/elsec/leg/esea02/107-110.pdf>.

Link to A-87:  
[http://www.whitehouse.gov/omb/circulars/a087/a87\\_2004.html](http://www.whitehouse.gov/omb/circulars/a087/a87_2004.html).