

Considerations for Using Federal Funds to Support National Board Certification and Related Resources

This document describes how school districts and schools can use U.S. Department of Education grant funds – specifically Title I, Part A, Title II, Part A and IDEA, Part B funds – for costs associated with pursuing, achieving, and maintaining National Board certification, as well as Board-related resources for beginning teachers.

All of the activities listed in the accompanying chart can be supported with Title I, Part A, Title II, Part A, or IDEA, Part B funds in the appropriate circumstances, although there are considerations related to each grant to keep in mind. Please note the considerations listed below are not an exhaustive description of grant requirements.

Title I, Part A Considerations

A district or school may only use Title I, Part A funds to benefit eligible students in schools that receive Title I, Part A funds (known as Title I schools).

Title I, Part A provides supplemental funding to help low-income schools improve the academic achievement of educationally disadvantaged students in order to provide all children with a high-quality education and to close achievement gaps.¹

Districts that receive Title I funds retain some of the money at the central level. Districts have the option to use some of the retained Title I funds for centrally-managed initiatives in all or a subset of its Title I schools.²

Districts must allocate the rest of the money to its high-poverty schools.³ Schools that receive Title I funds must use them to operate one of two types of programs:

1. Schools with at least 40% poverty, or a waiver from its state, may operate a *schoolwide program*.⁴ Schoolwide program schools can use Title I funds to upgrade their entire educational program,⁵ and all students are considered eligible students.⁶ Schoolwide schools must develop a plan describing the services they will provide based on a comprehensive assessment of the school's needs.⁷
2. Schools that do not operate a schoolwide program must operate a *targeted assistance program*.⁸ Targeted assistance schools must use Title I funds to help specific students⁹ selected from among the following

¹ ESSA, Sec. 1001.

² 34 CFR § 200.77.

³ Generally, a school is eligible for Title I if it has at least 35% poverty, but not all eligible schools necessarily receive Title I funds. Districts have discretion to concentrate Title I funds in their highest poverty schools. ESSA, Sec. 1113.

⁴ ESSA, Sec. 1114(a)(1).

⁵ ESSA, Sec. 1114(a)(1)(A).

⁶ ESSA, Sec. 1114(a)(2).

⁷ ESSA, Sec. 1114(b).

⁸ ESSA, Sec. 1115.

⁹ ESSA, Sec. 1115(b)(2)(A).

categories: students who (1) are failing, or at risk of failing, to meet state standards, (2) participated in certain federally-funded preschool programs, (3) received services under the Migrant Education Program, (4) are in a local institution for neglected or delinquent children or are attending a community day program, or (5) are homeless.¹⁰

Among other requirements, Title I, Part A includes a requirement known as “supplement not supplant,” which, in general terms, means Title I funds should add to (supplement) and not replace (supplant) state and local funds. To comply with this requirement districts must show they provide Title I schools with all of the state and local funds, or state and locally-funded resources, they would have provided if the school did not participate in the Title I program.¹¹

Title II, Part A Considerations

The purpose of Title II, Part A is to increase student achievement by improving the quality, and increasing the number of effective teachers, principals, and other school leaders, and to provide low-income and minority students with greater access to those personnel.¹²

Districts that receive Title II, Part A funds must prioritize Title II, Part A funds to schools implementing comprehensive or targeted support and improvement activities that also have the highest percentage of low-income and other disadvantaged children.¹³ Districts must also consider input from stakeholders when deciding how to spend Title II, Part A funds.¹⁴

Like Title I, Title II, Part A includes a supplement not supplant requirement, but in Title II supplanting is presumed when:

- A district uses Title II, Part A funds to pay for an activity that is required by federal, state or local law, or
- A district uses Title II, Part A funds to pay for an activity it supported with state or local funds the prior year.

Districts can overcome these presumptions in certain circumstances.

IDEA, Part B Considerations

Among other purposes, IDEA, Part B provides federal funds to support free appropriate public education to students with disabilities.¹⁵

Districts may only spend IDEA, Part B funds to benefit eligible students with disabilities. This can include supports to special education teachers as well as general education teachers that serve students with disabilities so long as the activity will benefit students with disabilities.

IDEA, Part B also includes a supplement not supplant requirement, but districts comply with it by maintaining a consistent level of state and local funding for special education and related services from year-to-year.

¹⁰ ESSA, Sec. 1115(c).

¹¹ ESSA, Sec. 1118(b)(2).

¹² ESSA, Sec. 2001.

¹³ ESSA, Sec. 2102(b)(2)(C). It is possible that some districts will not have schools identified for comprehensive or targeted support and intervention.

¹⁴ ESSA, Sec. 2102(b)(3) & Sec. 2102(b)(2)(D).

¹⁵ IDEA, Sec. 601(d).

Using Federal Funds to Support National Board Certification and Board-Related Resources

Please see endnotes for relevant federal statutory, regulatory, or guidance citations.

Encouraging Teachers to Pursue, Achieve, and Maintain National Board Certification		Federal Funding Considerations
Activity	Examples of Permissible Costs Related to the Activity	- Title I, Part A can only pay for teachers working with Title I eligible students in Title I schools. - Title II, Part A can pay costs for any teacher in the district, but districts must generally prioritize lowest performing high-poverty schools. - IDEA, Part B can only pay for costs when it will benefit students with disabilities, such as encouraging special education teachers to improve subject matter mastery by pursuing Board certification in a content area or encouraging any teacher to pursue Board certification as an exceptional needs specialist.
Defraying the cost of Board fees ¹	- Registration fee - Component certification fees - Certification maintenance fees	
Additional compensation for teachers who achieve Board certification ²	- Bonus pay for Board certified teachers - Step increases for Board certified teachers - Differential pay for Board certified teachers	
Supporting Teachers Pursuing National Board Certification		
Activity	Examples of Permissible Costs Related to the Activity	
Facilitate collaboration among teachers pursuing Board certification, such as a professional learning community (PLC) for a cohort of teachers ³	- Stipends for participating teachers - Substitute teachers to provide release time - Related materials and supplies	
Provide mentoring to teachers pursuing Board certification ⁴	- Compensating mentors - Substitute teachers to provide release time - Training for mentors on the skills needed to mentor effectively	
Provide instructional coaching or other professional development to teachers pursuing certification ⁵	- Compensating instructional coaches - Substitute teachers to provide release time - Registration and other fees for professional development courses	
Supporting Beginning Teachers with National Board Resources		
Activity	Examples of Permissible Costs Related to the Activity	
Develop induction programs for new teachers led by experienced Board-certified teachers, which could include mentoring, observation and collaboration, and professional development ⁶	- Compensation for Board certified teachers who offer induction supports - Stipends for new teachers who participate in the induction program - Substitute teachers to provide release time - Fees for professional development courses - Related materials and supplies	
Train existing mentor teachers to use National Board Standards to guide feedback and encourage mentor teachers to pursue Board certification ⁷	- Stipends to mentor teachers who participate in training about National Board Standards - Substitute teachers to provide release time - Fees for professional development aligned to National Board Standards - Related materials and supplies	
Provide new teachers access to the National Board's ATLAS video library to improve their performance and effectiveness ⁸	ATLAS subscription fee	

Endnotes

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- ¹ **Title I, Part A:** 34 CFR § 200.77(g) (district-level spending), ESSA. Sec. 1114(b)(7)(A)(iii)(IV) (schoolwide spending), ESSA. Sec. 1115(b)(2)(D) (targeted assistance spending). **Title II, Part A:** ESSA. Sec. 2103(b)(3)(B). **IDEA, Part B:** U.S. Department of Education, *Using ARRA Funds Provided Through Part B of the Individuals with Disabilities Education Act (IDEA) to Drive School Reform and Improvement* (2009), Section A, at <https://www2.ed.gov/policy/gen/leg/recovery/guidance/idea-b-reform.pdf> (this guidance will be referred to as *ED 2009 IDEA, Part B Reform Guidance* from now on; please note while this guidance was developed to address spending the additional IDEA, Part B funds appropriated through the American Recovery and Reinvestment Act (ARRA), it applies to regular IDEA, Part B funds as well).
- ² **Title I, Part A:** 34 CFR § 200.77(g) (district-level spending), ESSA. Sec. 1114(b)(7)(A)(iii)(IV) (schoolwide spending), ESSA. Sec. 1115(b)(2)(D) (targeted assistance spending). **Title II, Part A:** ESSA. Sec. 2103(b)(3)(B). **IDEA, Part B:** *ED 2009 IDEA, Part B Reform Guidance* at Section A, p. 6 (noting compensation is a factor in supporting effective teachers). ED also noted districts have discretion over how best to recruit, retain, and develop teachers who provide services to students with disabilities in the *Federal Register*, at 71 Fed. Reg. 46,539 at 46,612 (Aug. 11, 2006)).
- ³ **Title I, Part A:** 34 CFR § 200.77(g) (district-level spending), ESSA. Sec. 1114(b)(7)(A)(iii)(IV) (schoolwide spending), ESSA. Sec. 1115(b)(2)(D) (targeted assistance spending). **Title II, Part A:** ESSA, Sec. 2103(b)(3)(B) & Sec. 2103(b)(3)(E) (please note personalized professional development supported under ESSA, Sec. 2103(b)(3)(E) must be evidence-based to the extent the relevant state educational agency, in consultation with its local educational agencies, determines such evidence is reasonably available – please see <https://www.nbpts.org/research/> for a summary of research supporting Board certification generally). **IDEA, Part B:** *ED 2009 IDEA, Part B Reform Guidance* at Section A.
- ⁴ **Title I, Part A:** 34 CFR § 200.77(g) (district-level spending), ESSA. Sec. 1114(b)(7)(A)(iii)(IV) (schoolwide spending), ESSA. Sec. 1115(b)(2)(D) (targeted assistance spending). **Title II, Part A:** ESSA, Sec. 2103(b)(3)(B), see also U.S. Department of Education, *Non-Regulatory Guidance for Title II, Part A: Building Systems of Support for Excellent Teaching and Leading* (2016), pp. 9-10, at <https://www2.ed.gov/policy/elsec/leg/essa/essatitleiipartaguidance.pdf> (this guidance will be referred to as *ED 2016 Title II Guidance* from now on). **IDEA, Part B:** *ED 2009 IDEA Reform Guidance* at Section A.
- ⁵ **Title I, Part A:** 34 CFR § 200.77(g) (district-level spending), ESSA. Sec. 1114(b)(7)(A)(iii)(IV) (schoolwide spending), ESSA. Sec. 1115(b)(2)(D) (targeted assistance spending). **Title II, Part A:** ESSA, Sec. 2103(b)(3)(E), (F), (G), (M) & (O), see also *ED 2016 Title II Guidance* at p. 14 (please note personalized professional development supported under ESSA, Sec. 2103(b)(3)(E) must be evidence-based to the extent the relevant state educational agency, in consultation with its local educational agencies, determines such evidence is reasonably available – please see <https://www.nbpts.org/research/> for a summary of research supporting Board certification generally). **IDEA, Part B:** *ED 2009 IDEA, Part B Reform Guidance* at Section A.
- ⁶ **Title I, Part A:** 34 CFR § 200.77(g) (district-level spending), ESSA. Sec. 1114(b)(7)(A)(iii)(IV) (schoolwide spending), ESSA. Sec. 1115(b)(2)(D) (targeted assistance spending). See also U.S. Department of Education, *Using Title I, Part A ARRA Funds for Grants to Local Educational Agencies to Strengthen Education, Drive Reform, and Improve Results for Students* (2009), Q&A E-4, at <https://www2.ed.gov/policy/gen/leg/recovery/guidance/titlei-reform.pdf> (this guidance will be referred to as *ED 2009 Title I Reform Guidance* from now on; please note while this guidance addresses the additional Title I, Part A funds appropriated through ARRA it applies to regular Title I funds as well). **Title II, Part A:** ESSA, Sec. 2103(b)(3)(B)(iv)). See also *ED 2016 Title II Guidance* at pp. 9-11. **IDEA, Part B:** *ED 2009 IDEA, Part B Reform Guidance* at Section A.
- ⁷ **Title I, Part A:** 34 CFR § 200.77(g) (district-level spending), ESSA. Sec. 1114(b)(7)(A)(iii)(IV) (schoolwide spending), ESSA. Sec. 1115(b)(2)(D) (targeted assistance spending). See also *ED 2009 Title I Reform Guidance* at Q&A E-4. **Title II, Part A:** ESSA, Sec. 2103(b)(3)(B)(iv)). See also *ED 2016 Title II Guidance* at pp. 9-11. **IDEA, Part B:** *ED 2009 IDEA, Part B Reform Guidance* at Section A.
- ⁸ **Title I, Part A:** 34 CFR § 200.77(g) (district-level spending), ESSA. Sec. 1114(b)(7)(A)(iii)(IV) (schoolwide spending), ESSA. Sec. 1115(b)(2)(D) (targeted assistance spending). See also *ED 2009 Title I Reform Guidance* at Section E. **Title II, Part A:** ESSA, Sec. 2103(b)(3)(E), (F), (G), (H), (M) & (O) (please note personalized professional development supported under ESSA, Sec. 2103(b)(3)(E) must be evidence-based to the extent the relevant state educational agency, in consultation with its local educational agencies, determines such evidence is reasonably available – please see <https://www.nbpts.org/wp-content/uploads/ATLAS-One-Pager.pdf> for a summary of research supporting ATLAS). **IDEA, Part B:** *ED 2009 IDEA, Part B Reform Guidance* at Section A.