

Resource 5: Use of Funds for Meetings, Conferences, and Technology

Use of *Title III* Funds for Meetings and Conferences

Federal grant funds may be used to host a meeting/conference, if doing so is

- Consistent with the approved application.
- For the purpose of conveying technical information.
- Reasonable and necessary to achieve the purposes of the grant.

However, some issues need to be carefully monitored:

- **A grantee hosting a meeting/conference cannot use grant funds to pay for food for attendees.**
The exception to this rule is when it is necessary to provide food to allow attendees to participate in essential meeting/conference business. A working lunch is an example of a cost for food that might be allowable under a federal grant if attendance at the lunch is needed to ensure full participation by attendees in essential discussions and speeches concerning the purpose of the meeting/conference and to achieve the goals and objectives of the project. The host must manage costs to minimize the cost to the federal award.
- **A meeting/conference hosted by a grantee using grant funds must not be promoted as a U.S. Department of Education (ED) meeting/conference.**
The ED seal cannot be used on meeting/conference materials or signage without prior approval by ED. It is unlikely that approval would be granted for a non-ED-sponsored meeting/conference.
- **Federal grant funds may be used to pay for the costs of attending a meeting/conference.**
Federal grant funds may be used to pay for travel expenses (transportation, per diem, and lodging) of grantee employees, consultants, and experts to attend a meeting/conference if the expenses are reasonable and necessary to achieve the purposes of the grant.
- **Federal grant funds may not be used to pay for the following costs:**
 - Alcoholic beverages.
 - Entertainment, including the costs of amusement, diversion, and social activities.
 - Lobbying: grantees must prorate travel and per diem costs for travel to Washington, DC, when meeting with Capitol Hill staff.

See 2 C.F.R. 200.432 for government-wide cost principles related to conferences and 2 C.F.R. 200.474 for those related to travel.

Use of *Title III* Funds for Technology

General advisement: A local educational agency (LEA) may use *Title III* funds to purchase technology for classroom use (such as devices or software) if:

- The expenditure meets the criteria that apply to all uses of federal education funds for being an allowable cost (e.g., that the cost is reasonable, necessary to run the program, and allocable).
- The technology would contribute to the overall objective of providing a language instruction educational program for English learners (ELs).
- The technology is being used only for ELs/*Title III*-served students; or, if the purchase will be used for ELs/*Title III*-served students for only a portion of the school day with others also using the technology, *Title III* funds are used for only that percentage of the purchase costs.
- The LEA has procedures in place to inventory and keep secure all technology and equipment purchases, and the LEA has appropriate software and procedures to protect any personally identifiable information concerning students.
- The expenditure would meet the “supplement, not supplant” provision under section 3115(g) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA).

The LEA should utilize the four questions used to make “supplement, not supplant” determinations and apply them:

- What is the instructional program or service provided to all students?
- What does the LEA do to meet civil rights requirements?
- What services is the LEA required to provide, according to federal, state, and local laws or regulations?
- Was the program or service previously provided with state, local, or federal funds?

The state educational association is advised to discuss the reasonableness criterion with the LEA; specifically, whether costs might be shared across other programs so the computers/devices/software can be used for purposes or student populations outside those included in *Title III*.

Here are some typical assumptions regarding these purchases that could be taken into consideration before deciding whether a software program or computer purchase is supplemental:

- The program supplements all other existing language programs.
- The program would not be able to be purchased in the absence of *Title III* funds.
- The number of devices/software to be purchased is above and beyond the number provided at the school for all students.

Additionally, in terms of stewardship of materials purchases with *Title III* funds, it is important that the LEA agrees to maintain the computer equipment, provide security for it, inventory the equipment, and maintain property records.