



Title I, II-A, IV-A Programs Policy



Policy Name	Title I, II-A, IV-A Programs Food Policy		
Date Approved	5/13/2019	Approved By	DAS
Date Updated	10/21/2020		

Audience

This policy pertains to Local Education Agencies.

Purpose

The purpose of this policy is to provide Local Education Agencies with guidance related to the term “reasonable and necessary” as applied to federal grant funds to pay for food.

Overview

While the specific guidelines that govern each Title program are unique, the issue of paying for food with Title funds is a practice that many Local Education Agencies employ. This policy is meant to provide guidance on the area of commonality among Title I, II-A and IV-A programs. Historically there have been three areas in which an LEA has used Federal grant funds to pay for food: Professional Development, Student Incentives and Parent Engagement. This policy addresses each of these areas.

<https://www2.ed.gov/policy/fund/guid/gposbul/gposbul.html>

Policy

This policy is meant to clarify the use of the term “reasonable and necessary” often referred to in regulations. For this purpose, **reasonable** can be interpreted as not exceeding the federal per diem rate, per meal, per person. However, **reasonable** is subordinate to **necessary**, which is addressed for the areas of Professional Development, Student Incentives and Parent and Family Engagement. *2 C.F.R Part 200.404*

Professional Development (Title I-A, Title II-A and Title IV-A)

Federal grant funds should rarely, if ever, be used to pay for food for professional development. The LEA should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks. In addition, when planning a meeting, LEA’s should consider a location in which participants have easy access to food and beverages. LEA’s will be expected to justify why participants engaging in professional development activities are not responsible for purchasing their own meal. In general, the agenda should allow time for participants to purchase on-site food (e.g. cafeteria, food trucks, etc.) or the time to travel to off-site restaurants. In the extremely rare instances when either of these options is not readily available the agenda does not allow for a meal break during the event, the LEA will need to provide a compelling rationale for this need.



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Student Incentives (Title I-A and Title IV-A)

Federal grant funds should not be used to pay for food related to student incentives. There are a substantial number of non-food items, of nominal value, that can be purchased as incentives for increased or improved academic achievement. When purchasing student incentives, the primary focus should be on items best categorized as instructional supplies, instructional materials or plaques and should be of nominal value. The cost of incentive per student is not to exceed \$15 -\$20 per student.

The need for an incentive program should be identified in the CNA and appear in the IAP, as part of the school's continuous improvement plan.

Per 2 C.F.R. §200.403(a) funds for a Federal program may only be used for a student who participates in that Federal program. (For example, an LEA would use Title I funds to provide incentives to only Title I students)

Family and Community Engagement (Title I-A and Title IV-A)

Federal grant funds may be used to pay for light refreshments to facilitate parent attendance (e.g. coffee and donuts, cookies and juice, pretzels and bottled water) during school-based events. The event must appear in the LEA's Integrated Action Plan as part of continuous improvement efforts. Sign in sheets for all activities where federal funds are used to purchase food, must be uploaded to "related documents".

Family and community engagement funds can be used for light refreshments to facilitate parent attendance for meetings to support student and school achievement for parent events, such as:

- Parent Advisory Council
- Parent Teacher Conferences
- Parent math and reading training
- Parent curriculum and assessment training
- Title policy evaluations
- Title area supported activities

However, if an LEA feels there is a significant and compelling need to use federal funds for a meal, as opposed to light refreshments, in order to facilitate parent attendance, the event must be longer than two (2) hours and be scheduled over a normal meal time (e.g. 7:30- 10:30am, 11:30am – 2:30pm, 5:00 – 8:00pm). The per person cost of a meal should not exceed \$8.00 for Breakfast, \$10.00 for lunch and \$15.00 for dinner. Total cost cannot exceed .5% of a school's allocation for the year (Title I-A only). In the case of Title IV-A, amount is not to exceed 2% of total LEA Title IV-A allocation (excluding any prior year carryover).

If an LEA feels they have this need, they will be expected to justify (e.g. copies of emails, letters sent, time and date of calls/conversations) why alternative options were not used to purchase food for family and community engagement events. The LEA should attempt to have all, or a portion of the food paid through alternative sources such as sponsorship or donation from:



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- Local business
- Parent/Teacher organization
- Location restaurants, supermarket, etc.
- Local sports teams
- Food trucks

Federal grant funds may not be used to pay for meals during Saturday school or tutoring. However, snacks for extended learning time such as after school tutoring or Saturday school might be appropriate.

Federal grant funds may never be used for alcohol or entertainment. *2 C.F.R. § 200.423 (alcohol) and 200.438 (entertainment).*