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November 10, 2004

Raymond J. Simon
Assistant Secretary
Office of Elementary and Secondary Education
US Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Assistant Secretary Simon:

I am writing to obtain clarification on the use of Title I funds in a targeted assistance school.

May an LEA or school use Title I funds for professional development to provide training to non-Title I-paid teachers, paraprofessionals and other instructional and support service staff in a targeted assistance school if it improves their ability to serve Title I students in that school? If so, are there any conditions on their participation?

The funds in question are *not* those funds reserved by law to help teachers become highly qualified. Rather, they are funds voluntarily reserved from a district's or school's allocation to provide continuing professional development to benefit Title I children.

Guidance issued under the Improving America's Schools Act (*Professional Development*, April 1996, p. 2) stated:

“All school staff in targeted assistance schools may participate [in such professional development], if such participation will result in better addressing the needs of participating students.”

To date, the department has issued no guidance that contradicts the IASA guidance. It would be greatly appreciated if you would indicate whether this 1996 guidance remains in effect or has been supplanted by another policy.

I thank you in advance for your response.

Sincerely,

A handwritten signature in black ink that reads "Kristen Tosh Cowan". The signature is written in a cursive style with a large initial 'K' and a decorative flourish at the end.

Kristen Tosh Cowan