




STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING

RICK SNYDER  
GOVERNOR

MICHAEL P. FLANAGAN  
STATE SUPERINTENDENT

July 12, 2013

**MEMORANDUM**

TO: District/PSA Title I Coordinators/Contacts  
FROM: Michael W. Radke, Director  
Office of Field Services   
RE: Title I Equipment Use for Non-Title I Activities

Computer hardware and instructional software purchased with Title I funds must be based on a needs assessment and School Improvement plan to supplement students at risk of failing. The assessment and plan must show that the equipment is needed to improve the instruction and is necessary and reasonable to accelerate the achievement of the students. The equipment must be purchased solely for this purpose and not for any other activities. The equipment must be available for instructional programs for these students and they cannot be denied usage for other programs.

**The question that has been asked is: "Can Title I equipment be used for non-Title I activities, i.e. online testing of the general student population?"**

The answer to this question is **yes** under the following guidelines:

An LEA that decides to use Title I equipment on a part time or a special basis must do so in a manner that protects the integrity of the equipment as a Title I expenditure. Accordingly:

1. the LEA must ensure and document that the Title I equipment is part of a Title I program that has been properly designed to meet Title I participants' needs;
2. that the equipment purchased with Title I funds is reasonable and necessary to operate the LEA's programs, without regard to any use in non-Title I activities;
3. that the program has been designed to make maximum appropriate use of the equipment for Title I purposes;

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- 4. and that the use of the equipment in non-Title I activities does not:**
- a. decrease the quality or effectiveness of the Title I services provided to Title I children with the equipment,**
  - b. increase the cost of using the equipment for providing those services,**
  - c. or result in the exclusion of Title I children who otherwise would have been able to use the equipment.**

This is consistent with guidance found in 34 CFR 80.32(c). If further clarification is needed, please contact the Office of Field Services regional consultant for your area at 517-373-3921.

cc: Linda Forward  
Jim Griffiths  
Bruce Umpstead