FEDERAL PROGRAMS OFFICE
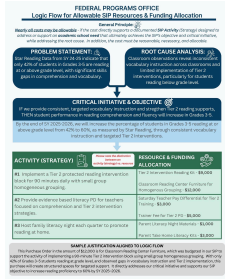
DOs and DON'Ts of SIP-Aligned Federal Spending

This DOs and DON'Ts list is designed to help all school administrators and leadership teams make compliant, intentional, and high-impact spending decisions using federal funds aligned to your Schoolwide Improvement Plan (SIP). It is your responsibility to ensure that every cost or resource is strategically justified, properly documented, and aligned to SIP objectives and federal regulations.

You may also refer to the Itemized Funding Allowability Matrix for Local, Federal, and ETC for additional guidance. However, please note that many items/resources under **Federal** are marked as **"it depends".**

This means that allowability will vary based on:
- How well the cost is aligned to your documented SIP
- Whether the cost is reasonable, necessary, and allocable
- Whether it follows the FPO Logic Flow Flyer for SIP aligned planning and justification
  - **Note: Nearly all costs may be allowable** - if the cost directly supports a documented SIP Activity (Strategy) designed to address or support an academic school need that ultimately achieves the SIP's objective and critical initiative, while addressing the root cause. In addition, the cost must be reasonable, necessary, and allocable.

DO's	DON'Ts
SIP Alignment & Documentation	
DO - **Align every SIP Activity (Strategy) to a resource & budget** that ultimately supports a school objective or critical initiative. **(Refer to FPO Logic Flow Flyer-click here)**	DON'T - Fund activities (strategies) that are not tied to your SIP or developed outside the school planning process.
DO - Use the following **Logic Flow** to justify spending decisions: • Needs Assessment (backed by data) → Root Cause Analysis → Critical Initiative → Objective → Activity (Strategy) → Resources & Budget **(Refer to FPO Logic Flow Flyer-click here)** 	DON'T - Submit a disconnected list of "nice-to-have" resources without documented needs or goals. Do not treat the budget as a wish list unrelated to actual school goals NOTE: Nearly all costs may be allowable - if the cost directly supports a documented SIP Activity (Strategy) designed to address or support an academic school need that ultimately achieves the SIP's objective and critical initiative, while addressing the root cause. In addition, the cost must be reasonable, necessary, and allocable.
DO - Ensure costs are **reasonable**, reflecting what a prudent person would pay under similar conditions.	DON'T - Request resources that are excessively priced, luxurious, or beyond typical school needs.
DO - Ensure costs are **necessary** to achieve the SIP activity/strategy and ultimately, the SIP objective.	DON'T - Fund resources that are optional, unrelated, or "nice to have" but not needed to achieve your SIP activity/strategy.
DO - Ensure costs are **allocable**, meaning they directly benefit the federal program or activity charged.	DON'T - Fund resources that do not benefit your SIP or are related to general school operations.
DO - Maintain complete **documentation**: sign-ins, agendas,	DON'T - Request PO approvals or pay differentials without

quotes, time logs, and written justifications.	full documentation or prior approval.
DO - Use federal funds to **supplement (enhance)**, not supplant (replace) local obligations. Ensure funds are used to enhance services, not replace costs required by law or district policy.	DON'T - Supplant (replace) costs that should be paid with local funds, such as standard furniture, utilities, admin costs, or construction. Do not redirect local funds simply because federal funds are available.

Travel and Professional Development

DO - Plan **travel** only when it directly supports a SIP-aligned professional development (PD) activity, program implementation, or an evidence-based strategy (proven or likely to be effective) that is not offered in-house, by the district, or virtually. In addition, approved travel must: ● Be sustained over time ● Be consistent with improving student achievement ● Address prioritized needs identified through school data	DON'T - Request travel simply because it is available, offered annually, or seems "nice to attend." Do not request travel that: ● Is available virtually, offered on-site by PSS, or provided through the district ● Is offered as a reward or incentive ● Supports stand-alone, one-day, or short-term professional learning that is not clearly aligned to the SIP or district strategic goals.
DO - Use funds to implement **evidence-based interventions, activities, and strategies** that are: ● Scientifically validated ● Documented in your SIP ● Monitorable, measurable, and evaluated for effectiveness	DON'T - Fund activities that are "loosely defined", have no clear strategy, or cannot be evaluated. Avoid activities not documented in the SIP.

Athletics & Stipend Matching

DO - Coordinate with the Athletics Program if using SIP funds to match an **Athletics stipend**. Request must be: ● Routed through the Athletics Program ● Tied to a documented SIP Activity (Strategy) ● Structured to prevent duplicate compensation	DON'T - Use SIP funds to match or supplement an athletics stipend (e.g., add $400) without coordination. Do not use SIP funds to equalize coaching pay without oversight.

Food & Venue Rentals

DO - Use **venue rentals** only when there is a documented need, such as when no school facility or PSS owned space is available. If venue rental is approved, the purchase of food may also be included only when truly necessary and only if all school or PSS owned space options have been exhausted. Food may be provided only if all of the following criteria are met: ● The PD or workshop is 6 hours or longer (to justify the working lunch) ● The session is clearly aligned to a documented SIP Activity (strategy) that supports a school objective ● A working lunch is justified in writing, showing the need for participants to remain actively engaged during lunch to complete a legitimate agenda ● AM or PM refreshments are allowed only if the PD session is a minimum of 4 hours.	DON'T - ● Rent venues when school or PSS owned space is still available or when the need is not documented ● Provide food for short sessions (less than 4 hours for refreshments or less than 6 hours for lunch) ● Request food for events not aligned to a documented SIP Activity (strategy) ● Fail to justify the need for a working lunch in writing ● Offer both AM & PM refreshments for the same session ● Use food or refreshments as a courtesy, incentive, or non-essential add-on without a clear instructional or programmatic purpose. ● Use food or refreshment to boost or uplift morale. NOTE: Federal grant funds should rarely, if ever, be used to pay for food for professional development. In general, the agenda should allow time for participants to purchase on-site food (e.g., cafeteria, food trucks) or the time to travel to

	off-site restaurants.

DO - Purchase **food for school site PD** only when truly necessary and when all of the following criteria are met:
● The PD or workshop is 6 hours or longer (to justify lunch)
● The session is clearly aligned to a documented SIP Activity (strategy) that supports a school objective
● A working lunch is fully justified in writing, showing a strong need for participants to remain actively engaged during lunch to complete a legitimate agenda:
   ○ Is the portion of the agenda to be carried out during lunch substantive and integral to the overall purpose of the PD?
   ○ Is there a genuine time constraint that requires a working lunch?
● AM refreshments are allowed only if the PD session is 4 hours or more
	DON'T -
	● Provide food for short sessions (less than 4 hours for refreshments or less than 6 hours for lunch).
	● Request food for PD that is not aligned to a documented SIP Activity (strategy).
	● Fail to justify the need for a working lunch in writing.
	● Offer both AM & PM refreshments in the same session.
	● Use food or refreshments as a courtesy, incentive, or non-essential add on without a clear instructional or programmatic purpose.
	
	NOTE: Federal grant funds should rarely, if ever, be used to pay for food for professional development. In general, the agenda should allow time for participants to purchase on-site food (e.g., cafeteria, food trucks) or the time to travel to off-site restaurants.

After School and Extended Learning Opportunity

DO - Use **After-School Pay Differentials** only if the program is: ● Clearly tied to a documented SIP Activity (Strategy) ● Evidence based ● Targets identified students ● Categorized as Credit Recovery, Enrichment aligned to academic gaps, or Extended Learning Opportunity	DON'T - Use differentials for activities not aligned to SIP, After-School/ELO proposal, or that do not address academic gaps, including: ● General enrichment ● Fundraising ● Homeroom and after-school supervision ● Yearbook club or other non-instructional extracurriculars

Pay Differentials – BOE § 60-30.2-790

DO - Refer to the **official PSS-approved differential schedule** (§ 60-30.2-790) for: ● After-school programs ● Coaching ● Saturday workshops ● Professional development	DON'T - Propose or approve pay differentials that: ● Exceed the BOE approved rates ● Use BOE unapproved schedules ● After the fact, pay differentials that were not pre-approved by the COE.
DO - Follow **§ 60-30.2-790(a)** for after-school, summer, Saturday, and coaching: ● Use only for BOE certified staff ● Get prior COE approval ● No overtime is allowed for duties already covered by the differential	DON'T - Approve or pay differentials: ● Without verifying staff eligibility ● Without COE approval ● As a workaround for overtime
DO - Follow **§ 60-30.2-790(b)** Proposed Rate Categories: ● Apply rates exactly as listed in law ● Monitor session time limits ● Use only for approved instructional activities (e.g., credit recovery, enrichment)	DON'T - ● Combine roles or split hours to inflate pay. ● Approve unlisted rates. ● Exceed time limits or assign differentials for unapproved duties (e.g., clerical work, general supervision).
DO - Follow **§ 60-30.2-790(c)** for PD Differentials: ● Use only for exempt staff who are facilitating, presenting, or coordinating ● Occurs outside of contract/office hours	DON'T - Use PD differentials for: ● Passive participation ● Activities during regular duty hours ● Misclassify support staff (e.g., timekeepers, school

● Pre-approved by the COE ● Pay $150/day (Saturday 4+ hrs) or $40/evening (2+ hrs) only when all criteria are met	aides) as eligible for full presenter rates
When in Doubt Reach Out	
When in doubt, **contact the Federal Programs Office** at fpo@cnmipss.org for clarification before taking action.	DON'T - Assume something is allowable just because "another school did it" or "it was approved before."