

# Purchasing Student, Staff, and Parent (Family) Travel with ESEA Funds

## What the Federal Law, Regulations, and Guidance Says

### Federal Statute

The Elementary and Secondary Education Act (ESEA) does not address using federal funds to pay for travel costs. In the absence of a reference in law, states and districts must look to regulations, non-regulatory guidance and other communications from the U.S. Department of Education (ED) for direction.

### Federal Regulations

All the administrative requirements for ED are found in the Education Department General Administrative Regulations (EDGAR), including Part 200 of Title 2 of the Code of Federal Regulations, commonly referred to as the Uniform Grants Guidance (UGG). The administrative rules and cost principles contained in Part 200 are applicable to all federal funding. This means that any use of federal funds, including for student and staff travel, needs to meet the definitions of [reasonable](#), [necessary](#), and [allocable](#) as described in UGG. The section of UGG specific to travel costs can be found here - [2 CFR § 200.475 Travel Costs](#).

### Federal Guidance

ED has published the following guidance document related to using federal grant funds to pay for costs of attending a meeting or conference:

[Frequently Asked Questions to Assist U.S. Department of Education Grantees to Appropriately Use Federal Funds for Conferences and Meetings](#)

## Determining Allowability

In making determinations about using federal funds for travel, districts must consider the cost principles described in UGG (necessary, reasonable, and allocable).

### **Uniform Grant Guidance Cost Principles**

Federal grant funds may be used to pay expenses for transportation, per diem, and lodging if the costs are reasonable, necessary, and allocable to the program.

Criteria	Guidance
<b>Reasonable</b>	A cost is reasonable if it does not exceed an amount that a prudent person would incur under the circumstances prevailing when the decision was made to incur the cost.
<b>Necessary</b>	To be considered necessary, the cost must be needed for the operation of the program.
<b>Allocable</b>	A cost is allocable if it benefits the program to which it is charged.

Per [2 CFR 200.475](#) in the Uniform Grant Guidance, travel costs include the transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the

district. These costs may be charged on an actual cost basis, on a per diem or mileage basis, or on a combination of the two, provided the method used is applied to an entire trip and not to selected days of the trip. The method used must be consistent with those normally allowed in like circumstances in the district's other activities and in accordance with the district's established written policies.

Districts are encouraged to reach out to their [assigned DEED Lead Program Manager](#) regarding the reasonableness of travel costs.

### Written Travel Policies

Districts may use federal grant funds for travel expenses only to the extent such costs are reasonable and necessary and do not exceed charges normally allowed by the grantee in its regular operations consistent with its written travel policies. Districts should follow their own travel and per diem rules and costs when charging travel expenses to their federal grant. In the absence of an established written policy regarding travel costs, the rates and amounts established under [5 U.S.C. 5701-11](#) ("Travel and Subsistence Expenses; Mileage Allowances"), by the Administrator of General Services, or by the President (or their designee) pursuant to any provisions of such subchapter must apply to travel under Federal awards ([48 CFR 31.205-46\(a\)](#)).

### Professional Development

In general, to use ESEA funds to pay for staff to attend conferences or other trainings, it must meet the definition of professional development. The ESEA's definition of "**professional development**" includes that it is "**sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused**" (ESEA section 8101(42)).

[Using Federal Grant Funds to Pay for Costs of Attending a Meeting or Conference Sponsored by ED or a Third Party \(from ED FAQs\)](#)

#### **1. What factors should a grantee consider when deciding whether to host a meeting or conference?**

Grantees should consider whether a face-to-face meeting or conference is the most effective or efficient way to achieve the desired result and whether there are alternatives, such as webinars or video conferences, that would be equally or similarly effective and more efficient in terms of time and costs than a face-to-face meeting. In addition, grantees should consider how the meeting or conference will be perceived by the public; for example, will the meeting or conference be perceived as a good use of taxpayer dollars?

#### **2. May grantees use Federal grant funds to pay for the cost of attending a meeting or conference?**

If attending a meeting or conference is necessary to achieve the goals and objectives of the grant, and if the expenses are reasonable (based on the grantee's own policies and procedures, and State and local laws), Federal grant funds may be used to pay for travel expenses of grantee employees, consultants, or experts to attend a meeting or conference. To determine whether a meeting or conference is "necessary," grantees should consider whether the goals and objectives of the grant can be achieved without the meeting or conference and whether there is an equally effective and more efficient way (in terms of time and money) to achieve the goals and objectives of the grant. To determine whether the expenses are "reasonable," grantees should consider how the costs (e.g., lodging, travel, registration fees) compare with other similar events and whether the public would view the expenses as a worthwhile use of Federal funds.

**3. What should a grantee consider when planning to use Federal grant funds for attending a meeting or conference?**

Among other considerations, grantees should consider how many people should attend a meeting or conference on its behalf. The number of attendees should be reasonable and necessary to accomplish the goals and objectives of the grant. The grantee should also determine whether it is necessary to attend the entire meeting or conference, or whether attending only a portion of the meeting or conference is reasonable and necessary.

**4. What travel expenses may be paid for with Federal grant funds?**

Grantees may use Federal grant funds for travel expenses only to the extent such costs are reasonable and necessary and do not exceed charges normally allowed by the grantee in its regular operations consistent with its written travel policies. See [2 CFR § 200.475](#). Federal grant funds may be used to pay expenses for transportation, per diem, and lodging if the costs are reasonable and necessary. Federal grant funds may not be spent on alcohol. See [2 CFR § 200.423](#). Grantees should follow their own travel and per diem rules and costs when charging travel expenses to their federal grant. In the absence of an acceptable written policy regarding travel costs, grantees must satisfy the requirements of 2 CFR § 200.475(d).

**5. What should grantees consider when including Federal employees at a grantee-sponsored meeting or conference?**

In some situations, a grantee may invite a federal employee to participate in or present at a grantee organized meeting or conference. Federal employees are subject to Federal ethics laws and regulations. This includes laws and regulations governing conflicts of interest and gifts (e.g., waiver of a registration fee, travel expenses, and meals). Grantees may be subject to their own ethics laws and regulations, and grantee employees should ensure that they comply with them.

**Parent and Family Engagement**

Districts may use Title I-A funds to pay for transportation, childcare, or home visits, as such services relate to parental involvement and enable parents to participate in school-related meetings and training sessions. Additionally, the U.S. Department of Education strongly encourages parents to attend local or regionally based training opportunities, such as workshops or conferences, when they are the same or similar as those being held out-of-State. Upon return from any workshop or conference that is not available to all other interested parents, attendees should provide information and, if possible, training on the conference topics to other parents of children enrolled in Title I-A programs. Title I-A funds may be used for costs that are reasonable and necessary to support the attendance of parents of participating children at these workshops and conferences to enable them to participate more effectively in the local program or to conduct home-based educational activities. Paying travel and other costs associated with attendance at out-of-State conferences and workshops may be allowable in some special cases.

Districts may use Title I-C funds for costs that are reasonable and necessary to support the attendance of parents of migratory children at workshops, conferences, or other parent engagement activity that enable them to participate more effectively in the local program or to conduct home-based educational activities. The district should develop criteria, in consultation with parents, to determine the reasonable

number of parents who may attend national meetings. Upon return, attendees should provide information and, if possible, training on the conference topics to other parents of migratory children.

### **Student Travel**

Districts may use federal grant funds for field trips tied to curriculum as well as programming being offered (such as an afterschool program), including renting a bus and/or paying for gas (if needed). Districts may also use federal grant funds to pay for airfare, hotel, and meal allowances for out-of-state field trips that are educationally related such as Close Up in Washington, DC. However, to ensure federal funds are used for reasonable and necessary activities, districts should investigate in-state opportunities first. Student chaperones are also an allowable use of grant funds. Field trips for social, entertainment, or recreational purposes are unallowable.

#### **Transportation: Children and Youth Experiencing Homelessness**

This [brief](#) explains the provisions of Subtitle VII-B of the McKinney-Vento Homeless Assistance Act related to the transportation of children and youth experiencing homelessness and offers strategies for implementing the law. Topics include: Key Transportation Provisions under the McKinney-Vento Act; Resources for Funding Transportation; Collaborating to Provide Transportation; Using Discretion and Sensitivity in Providing Transportation; and Strategies for the Efficient Transportation of Children and Youth Experiencing Homelessness.

This [NCHE tip sheet](#) highlights strategies for providing transportation for homeless students in rural areas provided by local homeless education liaisons, state coordinators for homeless education, and state pupil transportation directors.

#### **Transportation: Students in Foster Care**

The Title I educational stability provisions require districts receiving Title I-A funds to collaborate with child welfare agencies to develop and implement clear written procedures governing how transportation to maintain students in foster care in their schools of origin will be provided, arranged, and funded for the duration of the students' time in foster care. (ESEA section 1112(c)(5)(B)).

Districts may pay for the additional costs needed to transport children in foster care to their school of origin consistent with Section 1112(c)(5). Districts have discretion over how much, if any, to reserve; ESEA does not specify an amount. Additional costs incurred in providing school of origin transportation are the difference between what a district otherwise would spend to transport a student to their assigned school and the cost of transporting a child in foster care to their school of origin. A district's transportation procedures must address any additional costs incurred in providing school of origin transportation. (See ESEA section 1112(c)(5)(B)(ii)).

Additional information can be found in the [Ensuring Educational Stability and Success for Students in Foster Care Non-Regulatory Guidance](#) (November 2024).

### **Unallowable Travel Costs**

According to [2 CFR 200.475 Travel Costs](#), the following are unallowable travel costs:

- **Dependents** - Travel costs for dependents are unallowable, except for travel of six months or more with prior approval of the Federal agency. See [2 CFR § 200.432](#).

- **Commercial air travel** - Airfare costs in excess of the basic least expensive unrestricted accommodations class offered by commercial airlines are unallowable except when such accommodations would:
  - Require circuitous routing;
  - Require travel during unreasonable hours;
  - Excessively prolong travel;
  - Result in additional costs that would offset the transportation savings; or
  - Offer accommodations not reasonably adequate for the traveler's medical needs. The recipient or subrecipient must justify and document these conditions on a case-by-case basis for the use of first-class or business-class airfare to be allowable in such cases.
- **Air travel by other than commercial carrier** - Travel costs by recipient or subrecipient-owned, - leased, or -chartered aircraft include the cost of the lease, charter, operation (including personnel costs), maintenance, depreciation, insurance, and other related costs. The portion of these costs that exceeds the cost of airfare, as provided for in the paragraph below is unallowable.
  - **Establishing rates and amounts** - In the absence of an established written policy regarding travel costs, the rates and amounts established under [5 U.S.C. 5701-11](#) (“Travel and Subsistence Expenses; Mileage Allowances”), by the Administrator of General Services, or by the President (or their designee) pursuant to any provisions of such subchapter must apply to travel under Federal awards ([48 CFR 31.205-46\(a\)](#)).
- **Entertainment costs** - (i.e., transportation to field trips for social, entertainment, or recreational purposes) Costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable, except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency.

Below are examples of unallowable travel costs. Please note that this is not an exhaustive list:

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| <ul style="list-style-type: none"> <li>• Airline upgrades</li> <li>• Early check-in and late check-out fees</li> <li>• TSA precheck</li> <li>• Travel insurance</li> <li>• Lost or stolen articles</li> <li>• Alcoholic beverages</li> <li>• Damage to personal cars, clothing, or other items</li> <li>• Services to gain entry to a locked car</li> <li>• Movies charged to hotel bills</li> </ul> | <ul style="list-style-type: none"> <li>• All expenses related to the personal negligence of the traveler, such as fines, parking tickets and traffic citations</li> <li>• Entertainment expenses</li> <li>• Tips and gratuities</li> <li>• Towing charges</li> <li>• Expenses for children, spouses, and companions while in travel status</li> <li>• Personal phone calls or faxes</li> </ul> |
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### **Proper Chart of Account Code Usage for Travel Costs**

Districts should reference the [DEED Uniform Chart of Accounts and Account Codes Descriptions](#) when determining that appropriate account codes to use.

**420 Staff Travel** (Required) - Expenditures for transportation, meals, hotel and other expenses associated with traveling on business for all school district personnel including public transportation

fares or private vehicle reimbursement at the designated rate per mile. Staff accompanying students as chaperones are recorded under student travel. (Please note: The fees to attend conferences, either virtual or in-person, shall be recorded to object code 410 Professional and Technical Services.)

**421 Staff Transportation** (Optional) - Expenditures for employee airfare, mileage reimbursements, car rental, aircraft charters, train fares, bus fares, and ferry fares.

**422 Staff Per Diem** (Optional) - Expenditures for housing, meals, daily travel allowances and other expenditures for employees while away from home on business.

**425 Student Travel** (Required) - Expenditures for transportation and related costs of classroom related and extra-curricular travel for students and chaperones. Expenditures for contracted services for to and from school transportation services and other state-approved student transportation should not be included here, but rather under object 440, Other Purchased Services.

**426 Student Transportation** (Optional) - Expenditures for student airfare, mileage allowances, car rental, aircraft charters, train fares, and bus fares.

**427 Student Per Diem** (Optional) - Expenditures for housing, meals, daily travel allowance, and other expenditures for students while away from home.

**440 Other Purchased Services** (Required) - School bus contracts related to contractor-operated services for to and from school transportation services and other state-approved student transportation should be included here.

## DEED Recommendations

Before deciding to use grant funds to pay for travel, the district should consider the following:

- Is the travel necessary to achieve the goals and objectives of the grant?
- Does the travel adhere to the district's written travel policies?
- If the travel is for staff to receive professional development, does the activity meet the definition of professional development under ESEA (i.e., sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused)? How can the professional development be shared with other school and district staff upon the traveler's return?
- How will the district know that the travel will have a measurable impact on improving student outcomes?