

Title IV, Part A Resource Guide

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# **Introduction**

The *Every Student Succeeds Act* (ESSA) became federal law in December 2015, reauthorizing the *Elementary and Secondary Education Act* (ESEA) of 1965 and replacing the *No Child Left Behind Act* (NCLB) of 2002. Despite some key changes in the law, the purpose remains the same: to ensure all students have equitable access to high-quality educational resources and opportunities to prepare all students to attain graduation success and be fully prepared to succeed in college, career, and civic participation.

The guidance in this document details the allowable uses of **Title IV, Part A (Fund Code 0309)** under ESSA. This guidance document is intended to help Local Education Agencies (LEAs) better understand the Title IV, Part A Student Support and Academic Enrichment (SSAE) program, its requirements, eligibility terms, and allowable SSAE program activities.

DESE would like to thank the New Hampshire Department of Education and the Minnesota Department of Education from whom we borrowed in creating this document.

# **What is Title IVA?**

The purpose of Title IVA is to improve students’ academic achievement through a holistic education by increasing the capacity of the state educational agency (SEA) and local educational agencies (LEAs) to provide all students with access to a well-rounded education, improve school conditions for student learning, and improve the use of technology in order to improve the academic achievement and digital literacy of all students. These funds are an opportunity to innovate, pilot, and collaborate on activities, services or programs related to these areas to improve equity, opportunity, and outcomes for all students.

**Well-Rounded Education**: The purpose of a well-rounded education is to provide an enriched curriculum and educational experiences to all students. In general, an LEA may use funds for any program or activity that supports student access to and success in well-rounded educational experiences.

**Safe and Healthy Students**: The second purpose is to improve school conditions for student learning. When students are healthy and feel safe and supported, they are more likely to succeed in school.

**Effective Use of Technology**: The third purpose is to improve the use of technology in order to improve the academic achievement and digital literacy of all students.

# **How is Title IVA Eligibility Determined?**

Local education agencies (LEAs) must be allocated and accept Title I, Part A awards in the prior fiscal year in order to be eligible to receive a Title IVA grant award allocation in the current year. LEAs will not receive Title IVA funds if they are not Title I, Part A eligible in the prior fiscal year, or forfeit Title I, Part A funds in the prior fiscal year.

# **Allocation and Distribution of Funds**

LEAs **must** prioritize the distribution of funds to schools based on one or more of several factors, including schools that:

* are among those with the greatest needs, as determined by the LEA;
* have the highest numbers of students from low-income families counted under section 1124(c);
* are identified for comprehensive support and improvement under Title I, Part A of the ESEA under section 1111(c)(4)(D)(i);
* are implementing targeted support and improvement plans under Title I, Part A of the ESEA as described in section 1111(d)(2); or
* are identified as a persistently dangerous public school under section 8532 of the ESEA. (ESEA section 4106(e)(2))

If an LEA receives an award allocation of **$30,000 or more** for a single year, the LEA must complete a comprehensive needs assessment inclusive of the three areas of Title IV, Part A and must use:

* At least 20 percent of funds for activities to support well-rounded educational opportunities.
* At least 20 percent of funds for activities to support safe and healthy students.
* Of the remaining funds, at least some must be used for activities to support effective use of technology.

For all LEAs, regardless of allocation award amount, not more than 15 percent of funding in the effective use of technology category can be spent on technology infrastructure including devices, equipment, software applications, platforms, digital instructional resources, and/or one-time purchases. This percentage requirement applies to all LEAs no matter the size of the allocation award.

Example: If an LEA puts $5,000 into effective use of technology, only $750 may be spent on purchasing technology infrastructure (defined above), and the remainder must be used on learning how to use technology effectively. The intent of the effective use of technology category is to promote professional learning and collaboration in order to better utilize and implement technology rather than purchasing devices and infrastructure. Additionally, no more than two percent of the Title IVA allocation can be spent on administrative costs.

LEAs may choose to flex a portion or all of its Title IVA allocation to Titles I, IIA, and/or III to allow the funds to be used in alignment with those particular grants’ priorities.

# **Needs Assessment**

An LEA that receives an allocation of $30,000 or more in Title IVA is required to complete a comprehensive needs assessment, which includes, at a minimum, an evaluation a least once every three years of the need for improvement in the three content areas: well-rounded education, safe and healthy students, and the effective use of technology.

Activities that are supported with Title IVA funds must be planned through consultation with stakeholders served by the LEA. Stakeholders include: parents, teachers, principals, other school leaders, special service providers, students, community-based organizations, local government representative, Indian tribes or tribal organizations, and others with relevant and demonstrated expertise. Stakeholders must be involved in choosing evidence-based programming that best addresses the identified needs.

The LEA is also expected to demonstrate ongoing consultation with stakeholders to continually improve and coordinate implementation of local activities with other programs and activities conducted in the community. The comprehensive needs assessment and documentation of the involvement of stakeholders should be kept on file at the LEA.

# **Supplement, Not Supplant**

The supplement, not supplant provision requires that federal grant funds must add to (or supplement) and not replace (or supplant) other funds (state/local) in providing general educational services. The purpose of this provision is to ensure that federal funds are benefiting the intended population and are not used to fund the basic education that the district would have provided in the absence of federal funds.

Any service that a district is required to provide under state or local rule or policy must be provided using state or local funds. If federal funds are used to provide these services, it is presumed that supplanting has occurred. Any service that was provided in the prior year with state or local funds that are then replaced by federal Title IVA funds is also assumed to be supplanting. LEAs are not permitted to use Title IVA federal funds to replace state or local funds.

To refute the “prior year” test of supplanting, the LEA would need to have documentation showing there was a reduced amount of state or local funds to pay for this activity, and the district made the decision to eliminate the activity without taking into consideration federal funds.

# **Equitable Services**

ESSA requires the equitable participation of students and educators in private, nonprofit schools for federally funded programs and services. All students attending nonprofit private schools inside a district’s geographic borders are eligible; students attending schools outside of a district’s borders are not eligible even if they live within the district boundaries. The public school district [[1]](#footnote-2) is required to have "timely and meaningful consultation" with private school officials regarding the participation of private school students and educators in ESSA-funded programs and services. The public school district is responsible for providing equitable services and must retain control of the federal funds used to provide such services. Therefore, equitable services are provided by either an employee of the district or through a contract by the district with an individual, association, agency, or organization. Reimbursement to participating private schools is not allowable. Please refer to the [ESSA Equitable Services for Private Schools Resource Guide](https://www.doe.mass.edu/federalgrants/resources/equitableservices-essa/rg-eqserv.docx) for more information.

# **Application Information**

The RFP for Title IVA is typically released in July and is listed on the DESE [Grants Management website](https://www.doe.mass.edu/Grants/). The RFP includes information on how eligible LEAs can apply for the grant, which is part of the ESSA Consolidated Application for Titles I, IIA, III, and IVA. Districts must apply for the grant through DESE’s Grants for Education Management System ([GEM$](https://mass.egrantsmanagement.com/default.aspx?ccipSessionKey=638531122470135416)). The Federal Grants Office will send out a message through GEM$ to LEA Grantwriters and LEA Fiscal Representatives when the RFP, allocations, and application become available.

# **Allowable Activities[[2]](#footnote-3)**

Remember: All costs must be necessary and reasonable.

| **Well-Rounded Educational Opportunities***(ESEA section 4107)* | **Safe and Healthy Students***(ESEA section 4108)* | **Effective Use of Technology***(ESEA section 4109)* |
| --- | --- | --- |
| * Improving access to foreign language instruction, arts, music education, dance, media arts, and theater
* Supporting college and career counseling, including providing information on opportunities for financial aid through the early FAFSA and college and career readiness software
* Providing programming to improve instruction and student engagement in science, technology, engineering, and mathematics (STEM), including computer science, and increasing access to these subjects for underrepresented groups; supporting participation in nonprofit competitions (e.g. robotics, math competitions, computer programming); providing students hands-on learning and exposure to STEM, including through field-based and service learning
* Strengthening instruction in American history, civics, economics, geography, government education, and environmental education
* Promoting access to accelerated learning opportunities including Advanced Placement (AP) and International Baccalaureate (IB) programs, dual or concurrent enrollment programs and early college high schools
* Activities supporting social emotional learning, including interventions that build resilience, self-control, empathy, persistence, and other social and behavioral skills.
* Costs associated with administration of a Seal of Biliteracy Program, including supplemental materials for assessment. **NOTE: funding for the World Language Assessment is not an allowable cost under Title IVA**
 | * Promoting community and parent involvement in schools
* Providing school-based mental health services and counseling
* Promoting supportive school climates to reduce the use of exclusionary discipline and promoting supportive school discipline
* Establishing or improving dropout prevention
* Supporting re-entry programs and transition services for justice-involved youth
* Implementing programs that support a healthy, active lifestyle (nutritional and physical education)
* Implementing systems and practices to prevent bullying and harassment
* Developing relationship building skills to help improve safety through the recognition and prevention of coercion, violence, or abuse
* Establishing community partnerships
* Preventing use of drugs, alcohol, tobacco, and electronic cigarettes
* Stipends for staff to attend or lead health and safety-related professional development
* Security cameras or emergency buttons if not required by state or local laws or previously funded with other sources
 | * Supporting high-quality professional development for educators, school leaders, and administrators to personalize learning and improve academic achievement
* Building technological capacity and infrastructure
* Carrying out innovative blended learning projects
* Providing students in rural, remote, and underserved areas with the resources to benefit from high-quality digital learning opportunities
* Delivering specialized or rigorous academic courses and curricula using technology, including digital learning technologies and assistive technologies
* Implementing personalized learning/blended learning programs
* Purchasing devices, equipment, software applications, platforms, digital instructional resources and/or other one-time IT purchases to build technology capacity and infrastructure and increase readiness. **NOTE: No more than 15 percent of funding in the effective use of technology category can be spent on technology infrastructure including devices, equipment, software applications, platforms, digital instructional resources, and/or one-time purchases.**
 |
| **Unallowable Costs (applies to all categories)** |
| * Anything previously funded by state or local funds
* Purchase of weapons and/or training in the use of a dangerous weapon
* Transportation to programs not funded by Title IVA
* Stipends for parents or students to participate in Title IVA activities
* Technology or devices to support activities/programs required to be provided under state or local rule or policy
* Medical supplies that are required to be provided by the district/school
* Standing desks and other furniture
* Construction
* Section 4001(b) in general, requires prior written informed parent consent of children under 18 years of age to participate in any mental-health assessment or service funded under this title.
* Section 4001(c) in general prohibits activities or programming that encourages teenage sexual activity.
* Section 8256 prohibits the uses of funds for construction, renovation and repair of school facilities, transportation, distribution of materials or programs that promote sexual activity, distribution of legally obscene materials, sex or HIV prevention education unless age-appropriate including benefits of abstinence or the operation of a program of contraceptive distribution.
 |

# **Program Evaluation and Data Collection**

In the Title IVA application, LEAs are required to identify at least one specific and measurable goal that will be used to determine the effectiveness for each Title IVA-funded activity. If a goal provided by the LEA is not specific enough or measurable, DESE may ask them to revise and re-submit the goal. LEAs are required to evaluate the activities funded by Title IVA to determine effectiveness. Based on the analysis of the data, LEAs should determine if the activities should be continued, modified, or discontinued.

Section 4104 (a)(2) of ESSA requires that the SEA publicly report "how funds made available under this subpart are being expended by local education agencies, including the degree to which the local educational agencies have made progress toward meeting the objectives and outcomes described in section 4106 (e)(1)(E)”.

At the end of the grant’s period of performance (September 30th of year 3), the SEA must compile data from LEAs including[[3]](#footnote-4):

* the amount of funds spent by content area: well-rounded education, safe and healthy students, and effective use of technology,
* whether the LEAs with Title IVA allocations of $30,000 or more, met the expenditure requirements (at least 20% in well-rounded education, at least 20% in safe and healthy students, and greater than $0 in effective use of technology), and
* the progress towards meeting each objective and outcome identified in the LEA’s approved application.

# **Frequently Asked Questions about Title IVA**

**May an LEA use a single activity to address more than one of the three SSAE program content areas (i.e., well-rounded education, safe and healthy students, effective uses of technology)?**

There may be certain activities an LEA wishes to fund that could fit into more than one of the SSAE program content areas. For example, a student trauma recovery program that utilizes student performance art could be categorized in either the safe and healthy students content area (ESEA section 4108) or the well-rounded education content area (ESEA section 4107) and could be used to satisfy expenditures requirements in both areas. In such cases, the LEA should explain in its application to the SEA how the activity fits in more than one content area. The SEA will ultimately approve or disapprove of the activity through its application approval process consistent with relevant statutory application requirements.

**Must an LEA distribute Title IVA program funds to each of its schools?**

No. An LEA is not required to distribute SSAE program funds to each of its schools. In prioritizing the distribution of funds, an LEA that provides district-wide services with the SSAE program funds must focus those services on schools with the greatest need identified in ESEA section 4106(e)(2)(A) and must implement the SSAE program consistent with all relevant statutory requirements.

**Can Title IVA funds be flexed into other ESSA Title grants?**

Yes, a district may flex a portion or the entirety of their Title IVA allocation into either Title I, Title IIA, and/or Title III. Please keep in mind that an LEA must consult with their private school officials prior to any flexing, as the amount of the equitable share for nonpublic schools would change if funds were flexed; however, the final decision about whether to flex funds remains with the LEA.

**If only a portion of the Title IVA allocation is flexed into another allowable federal program, making funds available less than $30,000, is the LEA required to follow Title IVA special rules?**

No, if a flex of funds leaves less than $30,000 in the Title IVA grant application, the LEA is not required to meet the 20 percent of funds for activities to support well-rounded educational opportunities, 20 percent of funds for activities to support safe and healthy students and at least some funds toward the effective use of technology. However, the LEA is required to have completed a comprehensive needs assessment with consultation prior to making the decision.

**Can Title IVA fund activities outside of the school day (i.e. before or after school)?**

Yes, activities funded with Title IVA may be outside of the school day.

**Improving access to foreign language instruction is included as an allowable cost under Well-Rounded Educational Opportunities. Does this include providing English language instruction to ELs?**

No, Title IVA is intended to be used for foreign language instruction only and may not be used for English language instruction for any students.

**Are funds restricted for new activities or can they be used to enhance or expand current programs/activities?**

Funds may enhance or expand current activities but may not supplant current funding sources.

**Must an LEA spend their entire Title IVA allocation within the school year that they receive it?**

No, although we encourage LEAs to spend funds within the school year they are received, Title IVA funds are part of a 27-month grant period of performance and are not required to be spent within the first school year. If needed, Title IA funds can be carried over in their entirety to a second school year.

**Is Title IVA included in the ESSA monitoring process?**

Yes, every six years, each LEA in the Commonwealth is scheduled for a [federal program monitoring review](https://www.doe.mass.edu/federalgrants/resources/monitoring/) of their Title I, Title IIA, and Title IVA federal grant programs authorized by the Every Student Succeeds Act (ESSA). During this time, LEAs will be assessed on different Title IVA criteria, including their annual report on fund use, adherence to the supplement not supplant requirement, process for prioritizing fund distribution, and program evaluation.

**What if no evidence of effectiveness is available for an activity to address an identified need?**

If there is no evidence of effectiveness for an activity to address an identified need, an LEA should use a logic model to demonstrate a rationale for why an activity is expected to address the need in the LEA’s specific context. The logic model should use prior research or data from performance monitoring to provide support that the activity is likely to improve the relevant outcome(s).

**Can the SSAE program funds be used to develop and implement emergency operations plans?**

Yes. Any activity that fosters safe, healthy, supportive, and drug-free environments that supports student academic achievement, including the development and implementation of an emergency operations plan, is allowable under section 4108.

**Does the 15% cap on technology infrastructure apply to blended learning software or other education technology expenses?**

Yes. Specifically, the statute states that LEAs may not use more than 15 percent for purchasing technology infrastructure as described in section 4109 (a)(2)(B) which states: "purchasing devices, equipment, and software applications to address readiness shortfalls" and in section 4109 (a)(4)(A) which states: "blended learning technology software and platforms, the purchase of digital instructional resources, initial professional development activities, and one-time information technology purchases."

**Can Title IVA funds be used to purchase food?**

In most cases, no, unless it is required to meet the purpose of a Title IVA program such as purchasing ingredients for a supplemental nutrition class.

1. This requirement does not apply to charter schools, regional vocational technical schools, or virtual schools. [↑](#footnote-ref-2)
2. **Note:** This table provides examples of allowable activities and is not an exhaustive list. Please consult the statute for more information. The text of the ESEA, as amended by ESSA, is available [here](http://legcounsel.house.gov/Comps/Elementary%20And%20Secondary%20Education%20Act%20Of%201965.pdf). [↑](#footnote-ref-3)
3. Note: The next Title IVA data collection will take place at the end of the FY24’s period of performance (9/30/25). The Federal Grant Programs office will provide additional guidance to LEAs in advance. [↑](#footnote-ref-4)