

Title IV, Part A, Student Support and Enrichment (SSAE) Grants: Frequently Asked Questionsⁱ

GENERAL REQUIREMENTS

What is the purpose of Title IV, Part A?

Authorized in December 2015, the Every Student Succeeds Act (ESSA) introduced a new formula grant under Title IV, Part A with a wide range of allowable uses. Title IV, Part A, Student Support and Academic Enrichment (SSAE) grants are intended to improve students' academic achievement by increasing the capacity of States, LEAs, schools, and local communities to:

- 1) Provide all students with access to a well-rounded education,
- 2) Improve school conditions for student learning, and
- 3) Improve the use of technology in order to improve the academic achievement and digital literacy of all students. (ESEA section 4101).

What are the Local Application Requirements for LEAs?

An LEA or consortium must consult with stakeholders during the design and development of the application and continue to consult with stakeholders throughout the implementation process of activities and programs that are being funded through Title IV, Part A (SSAE).

The application must:

- Describe the SSAE programs and activities the LEA proposes to implement.
- Include, as applicable, descriptions of any partnership with business, nonprofit organization, community-based organization, or other public or private entity with a demonstrated record of success in implementing allowable activities under the SSAE program.
- Describe, as applicable, how funds will be used for activities in the three content areas – well-rounded educational opportunities, safe and healthy students, and effective use of technology.
- Include program objectives and intended outcomes and describe how the LEA or its partners will periodically evaluate the effectiveness of its SSAE program activities based on those objectives and outcomes. (ESEA section 4106(e)(1)).
- Describe any proposed uses of funds for the direct administrative costs of carrying out the LEA's program responsibilities, consistent with the LEA's authority to reserve up to two percent of its allocation for such costs as authorized under ESEA section 4105(c).

PRIVATE SCHOOLS

What is required for the consultation with private schools?

Under Title IV, Part A, LEAs must provide for the equitable participation of private school students, teachers and other educational personnel in private schools located within the district's boundaries in Title IV, Part A-funded activities, including by engaging in timely and meaningful consultation with private school officials during the design and development of their Title IV, Part A programs. Districts must consult and collaborate with the private schools in their area to determine what allocations to private schools are appropriate.

Can private schools purchase technology with their Title IV, Part A funds?

Private schools must follow all the rules that districts follow when it comes to their Title IV, Part A allocation. If the private school wants to purchase devices, they must follow the special 15% rule where no more than 15% of the funds the private school uses in the Effective Use of Technology category is spent on devices. This is not 15% of their entire allocated amount.

NEEDS ASSESSMENT

Are districts required to complete a Needs Assessment?

ESEA section 4106(d) requires that an LEA receiving an SSAE program allocation of at least \$30,000 must conduct a comprehensive needs assessment prior to receiving its allocation, and subsequent needs assessments at least once every three years, to examine its needs for improvement of:

- 1) Access to, and opportunities for, a well-rounded education for all students;
- 2) School conditions for student learning to create a healthy and safe school environment;
- 3) Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.

If a district receiving \$30,000 or more is part of a consortium, do all the districts in the consortium have to conduct a needs assessment?

If an LEA is part of a consortium, and the consortium receives \$30,000 or more, the consortium must do a needs assessment of all the LEAs proposed to be served. ESEA section 4106(d)(1).

What tools and data may be available for an LEA to use in its comprehensive needs assessment and to help in choosing evidence-based programs and practices?

Although the U.S. Department of Education does not endorse any specific tools, the Appendix in the [Non-Regulatory Guidance](#) includes a list of resources and examples that LEAs may find helpful in conducting a comprehensive needs assessment and in choosing programs and

practices. There is also a resource document on the [KDE Title IV, Part A](#) website that districts may also find beneficial.

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 a Needs Assessment that was conducted as part of another grant application be used when applying for the Title IV, Part A grant?

Yes, as long as the Needs Assessment is relevant to (at least) one of the three content areas of Title IV, Part A and all of the information in the data gathered from the Needs Assessment is still current and relevant. Districts can also use their CDIP as their Needs Assessment if it is relevant to one or more of the content areas of Title IV, Part A. For additional Needs Assessment tools, please see the [KDE Title IV, Part A website](#).

What information is needed in the application when explaining the results of the Needs Assessment?

When completing the application in GMAP, districts need to describe the results of their needs assessment. Districts need to include data, survey results, or other information that indicated a need for the district. For each content area (well-rounded education, safe and healthy students, and effective use of technology), the districts need to describe the results of the needs assessment for that content area. When the district selects the activities, the activities must align with a need identified in the district's comprehensive needs assessment..

DISTRIBUTION OF FUNDS

Do these funds have to be split up to be used in all three areas (well-rounded education opportunities, safe and healthy students, and effective use of technology) or can it be all used in one of the three areas?

If the LEA's annual grant award is \$30,000 or higher, the grant funds must be utilized to address the three areas of focus, and must be based on the results of a comprehensive needs assessment in the areas that the grant is designed to target. It is possible that one initiative developed by an LEA could overlap the areas – well-rounded education opportunities and safe and healthy students, for example. The LEA will have to demonstrate, through its plan and budget, that the three areas are covered in the percentages identified – at least 20% of funding for activities to support well-rounded education opportunities, at least 20% to activities to support safe and healthy students, and a portion for activities to support effective use of technology.

If the allocation is below \$30,000, then a needs assessment does not need to be completed and funds can be spent in only one content area.

For the 15% technology infrastructure requirement, is the 15% based on the entire allocation or do we take into consideration the 20% requirement for well-rounded opportunities and supporting safe and healthy students?

The 15 percent Special Rule does not apply to the total SSAE subgrant an LEA may receive. The Special Rule in the SSAE program states that no more than 15 percent of funds for activities to support the effective use of technology may be used “for purchasing technology infrastructure as described in subsection (a)(2)(B), which includes technology infrastructure purchased for the activities under subsection (a)(4)(A).” To clarify, LEAs or consortia of LEAs may not spend more than 15 percent of funding in this content area on devices, equipment, software applications, platforms, digital instructional resources and/or other one-time IT purchases (ESEA section 4109(b)).

How does the LEA prioritize the distribution of funds to schools served?

The LEA prioritizes the distribution of funds based on one or more of the following criteria:

- a. Are among the schools with the greatest needs;
- b. Have the highest percentages or numbers of children counted under section 1124(c) (i.e., children counted for purposes of basic grants to LEAs under Title I, Part A of the ESEA);
- c. Are identified for comprehensive support and improvement under section 1111(c)(4)(D)(i) (i.e., are among the lowest achieving schools);
- d. Are implementing targeted support and improvement plans as described in section 1111(d)(2)(i.e., have consistently underperforming student subgroups); or
- e. Are identified as a persistently dangerous public elementary school or secondary school under section 8532 (ESEA section 4106(e)(2)(A)). (This does not apply in Kentucky for FY18)

What does supplement not supplant mean in the context of the SSAE program?

This means that an SEA or LEA may not use SSAE program funds to carry out activities that would otherwise be paid for with State or local funds. In determining whether a particular use of funds would violate the non-supplanting requirement, SEAs and LEAs should consider matters such as whether the cost involved is for an activity that is required by State or local law. In no event may an SEA or LEA decrease the amount of State or local funds used to pay the cost of an activity simply because of the availability of the SSAE program funds. LEAs are encouraged to contact the Division of Student Success with any questions about whether an activity might be considered as supplanting.

USE OF FUNDS

Can funds be used for certified or classified salaries?

Yes, Title IV, Part A funds can be used for salaries for certified and classified staff members to carry out program activities that are an identified need for the district. The salaries must be supplemental, meaning that Title IV, Part A funds can be used to fund a new position or to supplement an existing salary (i.e. making a part time position full-time and funding the rest of the salary with Title IV, Part A funds).

Can Title IV, Part A funds be used to pay for dual credit course fees or AP test fees for students?

For FY19, AP test fees for free and reduced lunch students will be covered by KDE. The point of contact for this is Jennifer Pusateri. She can be reached at jennifer.pusateri@education.ky.gov. Districts can use Title IV, Part A funds to cover AP test fees for students that do not qualify for free and reduced lunch as long as it is shown as a district need and districts are not supplanting another funding source. If districts typically covered this cost with state or local funds, then they cannot use federal funds.

Dual credit course fees can be covered for students, however, according to regulation 702 KAR 3:220, districts are required to cover course fees for free and reduced lunch students. At this time, it is unclear if this regulation includes dual credit course fees and we are waiting for KDE's legal office to make a determination. Until we get clarification about whether Title IV, Part A funds can be used to cover course fees for free and reduced lunch students, fees cannot be used for this purpose as it would be considered supplanting. The district would be required to cover the cost of the dual credit fees for these students. The funds can be used for students that do not fall in this category. Once KDE's legal office makes a determination, districts will be notified in regards to use of Title IV, Part A funds.

Can funds be used for physical safety of the building?

Title IV, Part A funds can be used to create a safe and healthy learning environment for students. If it is determined in the district's needs assessment and safety plan that the district needs to make some changes to create a safer learning environment it is allowable. *However*, federal funds cannot be used for construction, renovation, or repair of any school facility.

Can districts use funds to purchase technology under the Well-Rounded Education or Safe and Healthy Students sections of the grant?

Title IV, Part A has a special 15% rule under Effective Use of Technology where no more than 15% of funds in that category can be spent on technology infrastructure, which includes hardware, software, platforms, devices, and digital instructional resources. However, if the purchase of technology is integral to the running of the program under well-rounded education or safe and healthy students, then it is allowable. One example for well-rounded education is a district determines through their needs assessment that students need more exposure to more

STEM courses. The district decides to add a coding course. In order to run the coding course, the district must buy coding software. The purchase of the coding software is integral to the running of the course. An example under safe and healthy students is that a district determines that a safe schools hotline will benefit the district as it will allow students 24/7 access to mental health counselors and also allow students to call in tips that may affect school safety. The purchase of the hotline allows student's access to the mental health support and tipline to make the school safer and is integral to provide these services.

ⁱ Additional information from KDE can be found at <https://education.ky.gov/school/Pages/Title-IV,-Part-A.aspx>. Federal guidance and resources on Title IV, Part A, SSAE grants can be found at <https://safesupportivelearning.ed.gov/ESSA-TitleIVPartA-SSAE>.