

# **Title IV, Part A, Student Support and Enrichment (SSAE) Grants: Frequently Asked Questions<sup>i</sup>**

## **GENERAL REQUIREMENTS**

### **What is the purpose of Title IV, Part A?**

Authorized in December 2015, the Every Student Succeeds Act (ESSA) introduced a new block 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.

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).

**Our district is planning on conducting our Equitable Services consultation with our non-public schools for the 2018-19 school year for all the federal program funds. Do I need to conduct a separate consultation for Title IV, Part A for the 2017-18 funds we are currently applying for?**

If districts are in the process of sending out their Declaration of Participation to the non-public schools within their district for 2018-19 school year, they must include information regarding Title IV, Part A and must include Title IV, Part A as part of the consultation process. With 2017-18 funding coming out so late in the 2017-18 school year, districts can include in their 2018-19 consultation information about both 2017-18 and 2018-19 Title IV, Part A funding. LEAs will need to have documentation that consultation has occurred with non-public schools regarding both funding years even if the consultation for both funding years has taken place simultaneously.

**The budget pages in the application are requiring a narrative description. Is there anything specific that needs to be included?**

If an LEA receives \$30,000 or more, the narrative description should include what content area (well-rounded education, safe and healthy students, or effective use of technology) that activity will be going towards. All LEAs should include in the narrative description as much information as possible to help the SEA determine if the expense is reasonable and allowable under Title IV, Part A.

## **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 Department 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 needs assessment and in choosing programs and practices.

### **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. For additional Needs Assessment tools, please see the [KDE Title IV, Part A website](#).

## **DISTRIBUTION OF FUNDS**

### **How are the allocations to private schools within the district calculated?**

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 in areas these agencies serve 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. Allocations for private schools are calculated similarly to how Title II allocations are calculated and LEAs that have private schools that choose to participate in Title IV, Part A must complete the Equitable Services Worksheet that will calculate the Equitable Services amount and upload the form with their application.

### **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.

## **Allowable Activities**

### **How will state education agencies (SEAs) determine whether proposed activities in local educational agency (LEA) applications are allowable under the SSAE (Elementary and Secondary Education Act (ESEA) Title IV, Part A) program?**

LEAs will submit applications to SEAs. What LEAs propose as activities will be informed by the comprehensive needs assessment (required for LEAs with an allocation of at least \$30,000), stakeholder engagement, and prioritization of schools. The SEA's determination of allowability of SSAE funds will depend on a number of factors, starting with whether all statutory requirements are met. Generally, in reviewing an LEA's application, an SEA will first consider whether a proposed activity is consistent with the purposes of at least one of the three content areas in the SSAE program (well-rounded education in section 4107, safe and healthy students in section 4108, or the effective use of technology in section 4109). Assuming that the activity is consistent with the purposes of one of the three content areas, as applicable, the SEA must make further determinations as to allowability of costs in accordance with the cost principles in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at 2 CFR Part 200, Subpart E. Specifically, the cost of an activity is allowable under the SSAE program if it is reasonable and necessary for performance of the grant (i.e., it is of a type generally recognized as ordinary and necessary for operation of the grant) and allocable to the grant (i.e., it is chargeable to the grant award in proportion to the benefits received by the grant award as a result of the cost). Also, because section 4110 of the ESEA prohibits supplanting, the proposed use of funds for the activity must supplement, and not supplant, other State or local funds that would otherwise be used to pay for the allowable activity. Finally, SEAs must check to ensure that the activity is not one of the prohibited activities in section 4001(b) or 8526 of the ESEA, as amended by the Every Student Succeeds Act (ESSA).

### **May SSAE program funds be used for costs associated with training for safety and security staff?**

Yes, if the SEA determines it is an allowable activity consistent with the process and considerations described in the answer to the question above.

### **Can a district use Title IV, Part A funds for a School Resource Officer (SRO)?**

What LEAs propose as activities needs to be informed by the comprehensive needs assessment (required for LEAs with an allocation of at least \$30,000), stakeholder engagement, and prioritization of schools. The SEA's determination of allowability of SSAE funds will depend on a number of factors, starting with whether all statutory requirements are met. Generally, in reviewing an LEA's application, an SEA will first consider whether a proposed activity is consistent with the purposes of at least one of the three content areas in the SSAE program (well-rounded education in section 4107, safe and healthy students in section 4108, or the effective use of technology in section 4109). Assuming that the activity is consistent with the purposes of one of the three content areas, as applicable, the SEA must make further determinations as to allowability of costs in accordance with the cost principles in the Uniform Administrative

Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at 2 CFR Part 200, Subpart E. Specifically, the cost of an activity is allowable under the SSAE program if it is reasonable and necessary for performance of the grant (i.e., it is of a type generally recognized as ordinary and necessary for operation of the grant) and allocable to the grant (i.e., it is chargeable to the grant award in proportion to the benefits received by the grant award as a result of the cost). Also, because section 4110 of the ESEA prohibits supplanting, the proposed use of funds for the activity must supplement, and not supplant, other State or local funds that would otherwise be used to pay for the allowable activity. Finally, SEAs must check to ensure that the activity is not one of the prohibited activities in section 4001(b) or 8526 of the ESEA, as amended by the Every Student Succeeds Act (ESSA).

**May Title IV, Part A funds be used for coordinator salaries for programs like positive behavior intervention and supports (PBIS) and Youth Mental Health First Aid and Mental Health programming?**

Yes, if the LEA has determined this is a need for the district after consulting with stakeholders and as determined by the needs assessment.

**May activities supported with SSAE funds take place during out-of-school time?**

Yes, if the LEA has determined this is a need for the district after consulting with stakeholders and as determined by the needs assessment.

**Are the programs and services funded under the SSAE program for students only?**

No, the ESEA Title IV, Part A statute references as an example of allowable activities teacher professional development in several areas, as well as training for school personnel, including specialized instructional support personnel in other areas. It also references providing educators, school leaders, and administrators with professional learning tools, devices, content and resources related to educational technology.

**Is the purchase of educational resources and materials allowable with Title IV, Part A funds if this purchase is part of the LEA's needs assessment/plan to use Title IV, Part A funds?**

Yes, if the LEA has determined this is a need for the district after consulting with stakeholders and as determined by the needs assessment.

**Can districts use the funds to purchase laptops (Chromebooks) and educational software?**

Software and laptop purchases are allowable under Title IV, Part A, however technology purchases are subject to the special 15% technology rule. LEAs may not spend more than 15 percent of funding in this section on devices, equipment, software applications, platforms, digital instructional resources and/or other one-time IT purchases. 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.”

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<sup>i</sup> *Answers included here are from federal guidance and resource documents as well as correspondence with the U.S. Department of Education’s Title IV, Part A program staff. Additional information from KDE can be found at <https://education.ky.gov/school/Pages/Title-IV%2c-Part-A.aspx>. Federal guidance and resources on Title IV, Part A, SSAFE grants can be found at <https://safesupportivelearning.ed.gov/ESSA-TitleIVPartA-SSAE>.*