

Title IV, Part A: Student Support and Academic Enrichment Grants



Student Support, Academic Enrichment, and Educational Policy

August 04, 2020

From the ESEA to ESSA

Timeline

1965 - 1978

President Lyndon Johnson signs the Elementary and Secondary Education Act (ESEA) to aid disadvantaged students.

Programs and titles are implemented to aid low-income children; the phrase “supplement, not supplant” is introduced.

1979 - 2000

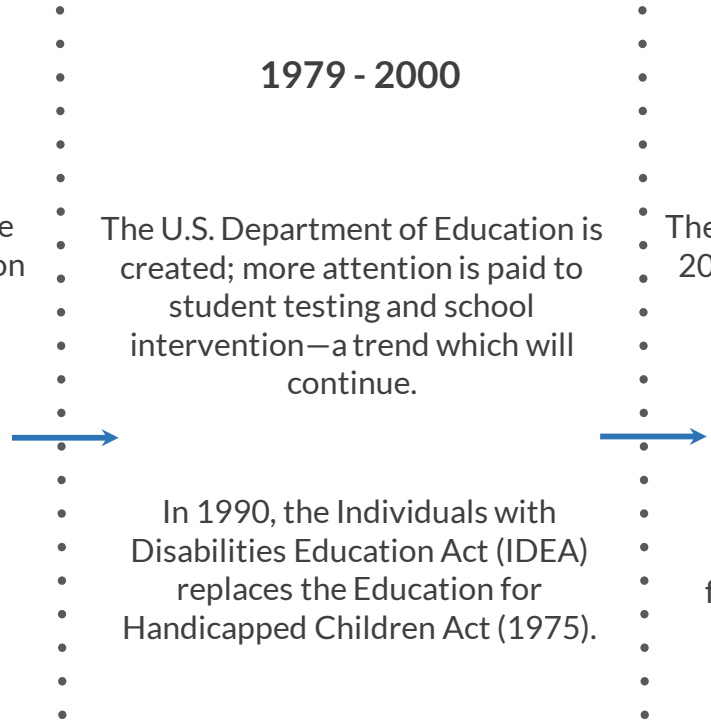
The U.S. Department of Education is created; more attention is paid to student testing and school intervention—a trend which will continue.

In 1990, the Individuals with Disabilities Education Act (IDEA) replaces the Education for Handicapped Children Act (1975).

2001 - 2015

The No Child Left Behind (NCLB) Act of 2001 reauthorizes Title IV as the Safe and Drug Free Schools Program.

In 2009, waivers, which ease the mandates of the NCLB, precede formal reauthorization of the ESEA. Ultimately, the Every Student Succeeds Act (ESSA) is signed into law.



The above timeline is summarized from Education Week’s “The Nation's Main K-12 Law: A Timeline of the ESEA (2015).”

Equitable Access

ESSA maintains the ESEA's civil rights tradition of providing equitable opportunity for all students.

Title IV, Part A

To ensure the success of every child, ESSA includes provisions and programs that promote equitable access to academic success. The Student Support and Academic Enrichment (SSAE) Program grant, or Title IV, Part A, is a reauthorized grant under ESSA.

To meet the goals of ESSA, the **Title IV-A grant increases the capacity of State educational agencies (SEAs), local educational agencies (LEAs), schools, and local communities to:**

1) Provide all students with access to a well-rounded education;

2) Improve school conditions for student learning (safe and healthy students); and

3) Improve the use of technology in order to improve the academic achievement and digital literacy of all students.

Special Rule

An LEA that receives $\geq \$30,000$ must use the following guidance:

Spending Rule



Not less than

20 %

Not less than

20 %

Portion

of the funds

Content Area



Well-Rounded Education

Safe and Healthy Students

Effective Use of Technology

No more than 15% of this portion on
technology infrastructure

Example Allocation

Total Allocation -

\$100,000



Well-Rounded Education - *Not more than 20% of total allocation*

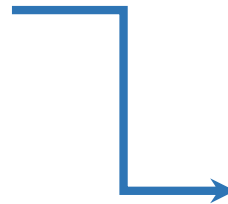
\$20,000

Safe and Healthy Students - *Not more than 20% of total allocation*

\$45,000

Effective Use of Technology - *A portion of funds*

\$35,000



Technology Infrastructure - *Not more than 15% of technology portion*

\$5,250

Roles

Once the SEA receives allocations, the distinction between State and local agency Title IV-A involvement is as presented:

Role of the SEA

- Ensures equitable access to an excellent education
- Awards sub-grants to LEAs by formula
- Develops and reviews the application that LEAs must submit in order to receive their funds
- Supports LEA activities and programs
- Reports on LEA use of funds and progress towards objectives/outcomes
- Fulfills all monitoring, technical assistance, and federal reporting requirements

Role of the LEA

- Submits an application to the SEA in order to receive its funding
- Engages in consultation with stakeholders in the area served by the LEA during the design and development of its application
- Implements activities and programs
- Provides equitable services
- Reports on progress toward activity objectives/outcomes and use of funds
- Fulfills all additional statutory requirements

The above diagram is summarized from the Maryland State Department of Education's "Every Student Succeeds Act, Title IV, Part A."



Pre-Award Phase

Funding Prioritization

LEAs must prioritize the distribution of Title IV-A grant funds to schools based on one or more of the following criteria:

- Schools with greatest needs, as determined by LEA;
- Schools that have the highest number of students from low-income families;
- Schools that are identified for targeted or comprehensive support and improvement (TSI/CSI) plans under Title I, Part A; and/or;
- Schools that are identified as persistently dangerous.

Identifying Local Needs

As part of the application consultation, LEAs must conduct a comprehensive needs assessment every three years. The needs assessment systematically measures and addresses any discrepancies between the LEA's current condition and its desired condition, specifically in regard to the three content areas.

- **Which stakeholders can help identify local needs?**
- **How can stakeholders be engaged in a timely and meaningful way throughout the process?**
- **What data are needed to identify local needs?**
- **Do current systems capture the needs of the hardest to serve student group?**
- **Are there any current inequities in the system?**
- **How should needs be prioritized?**

Selecting Evidenced-Based Activities

Although not required in statute, the non-regulatory guidance suggests LEAs and stakeholders should select evidence-based activities that will likely work in the local context. Evidence-based activities may derive from, or be informed by, research or school metrics and are more likely to meet an LEA's identified goals.

- **Are there any evidence-based activities that would address the identified needs?**
- **Does the LEA have the capacity to implement this activity or intervention?**
- **Does the potential outcome of an activity or intervention justify its costs?**

LEAs should prioritize intervention activities supported by higher levels of evidence, specifically *strong evidence* (Level 1) and *moderate evidence* (Level 2) as defined by ESSA.

ESSA's Four Evidence Levels

Level One: Strong Evidence

- Supported by one or more well-designed and well-implemented randomized control experimental studies

Level Three: Promising Evidence

- Supported by one or more well-designed and well-implemented correlational studies (with statistical controls for selection bias).

Level Two: Moderate Evidence

- Supported by one or more well-designed and well-implemented quasi-experimental studies.

Level Four: Demonstrates Rational

- Practices that have a well-defined logic model or theory of action, are supported by research, and have some effort underway by an SEA, LEA, or outside research organization to determine their effectiveness.

Taken from <https://www.cde.ca.gov/re/es/evidence.asp>, California Department of Education's [Evidence-Based Interventions Under the ESSA](#)

Prohibitions

LEAs should consider the prohibitions when selecting their activities.

In ESSA, Title IV-A:

No funds under this title may be used for—

- Medical services;
- Drug treatment;
- Rehabilitation; or
- A prescription for a controlled substance.

In ESSA, Title VIII (applicable to Title IV-A):

No ESSA funds may be used—

- For construction, renovation, or repair of any school facility;
- Regular bus transportation to/from school;
- To promote or encourage sexual activity;
- To distribute legally obscene materials;
- To provide age-inappropriate sex education or HIV-prevention education; or
- For contraceptive distribution in schools.

Well-Rounded Education

A well-rounded education reflects courses, activities, and programming in subjects with the purpose of providing all students access to an enriched curriculum and educational experience.

The allowable activities for a well-rounded education may include but are not limited to:

- **Science, technology, engineering, and mathematics**
- **Music and arts**
- **Foreign language instruction**
- **College and career counseling**
- **Social emotional learning**
- **Environmental education**

For allocations \geq \$30,000, no less than 20 percent of funds may support one or more of the allowable activities in this content area.

Safe and Healthy Students

The term “safe and healthy” refers to a school environment that fosters safety and support with the purpose of providing all students access to safe and healthy educational experiences.

The allowable activities for safe and healthy students may include but are not limited to:

- **Safe and supportive learning environments**
 - Re-entry programs
 - School readiness and academic success

- **Student physical and mental health**
 - Trauma-informed classroom management
 - School-based health and mental health services

- **Cross-cutting activities**
 - Mentoring and school counseling
 - Schoolwide Positive Behavioral Interventions and Supports
 - Pay for Success Initiatives

For allocations \geq \$30,000, no less than 20 percent of funds may support one or more of the allowable activities in this content area.

Effective Use of Technology

The effective use of educational technology refers to technological efforts to help students achieve academically by promoting the digital literacy of all students and providing professional development to educators.

The allowable activities for the effective use of technology may include but are not limited to:

- **Providing personalized learning**
- **Discovering, adapting, and sharing high-quality resources**
- **Implementing blended learning strategies**
- **Implementing school- and district-wide approaches to inform instruction, support teacher collaboration, and personalize learning**

For allocations \geq \$30,000, a portion of funds must be allocated to support one or more of the allowable activities in this content area, but no more than 15% of the funds for this content area can be used to support technology infrastructure.

Supplementing vs. Supplanting

Title IV, Part A funds should always supplement and never supplant other non-federal funding sources.

“Are we using Title IV-A money to provide services already required under law?”

- Supplanting is presumed if a district uses federal funds to provide services that are required under other federal, State, or local laws.

“How did we pay for this service last year?”

- Supplanting is presumed if a district uses federal funds to provide services that the district provided with non-federal funds in the prior year that are still available.

Taken from the Massachusetts Department of Elementary & Secondary Education’s “Title IV, Part A – Quick Reference Guide” (2019).

Cost Principles

LEAs should select activities based upon the four cost principles—

Necessary

This principle is of a type generally recognized as ordinary and necessary for the operation of the grant; this principle coincides with reasonableness

Reasonable

This principle asks the question, “would a prudent person pay this amount for this item?” The activity can be considered reasonable if the answer is “yes”

Allocable

This principle is something that is chargeable to the grant award in proportion to the benefits received by the grant award; for example—indirect or direct costs

Allowable

Encompasses all of the previous principles

Cost Principles (§§ 200.400 - 200.475)

Allowable Activities

LEAs should determine what makes an activity allowable by considering—

If the activity is one of the listed prohibited use of funds;

If the funding of the activity is supplanting any local or non-federal funding;

Whether the activity aligns with the purpose of one of the three content areas;

If the activity is aligned with cost principles, i.e., necessary, reasonable, allowable and allocable; and

If the activity was identified as a need through consultation with stakeholders

Allowable Examples

Allowable

- Transportation to/from Title IV-A related activities
- Digital learning subscriptions
- Salaries for personnel whose entire responsibility is Title IV-A
- Contractual services for teachers attending professional development in areas related to Title IV-A
- Negotiated indirect cost rates

Unallowable

- Regular bus transportation to/from school
- More than 15% of use of technology funds for purchasing technology infrastructure
- Salaries for personnel unrelated to Title IV-A
- Substitutes for teachers attending professional development unrelated to Title IV-A
- Indirect cost rates greater than what was negotiated

Equitable Services

Part of the application process also requires that LEAs provide equitable services to private school students and teachers.

LEAs initiate timely and meaningful consultation with private school officials and maintain documentation



LEAs and private school officials maintain ongoing consultation



LEAs submit documentation of consultation with private school officials

All nonpublic spending must be included in both total allocation and as part of the 20-20-15 percentage requirements.

Assurances

LEAs must include in their application assurances that the LEA will—

- **Prioritize the distribution of Title IV-A grant funds;**
- **Comply with equitable participation;**
- **Use not less than 20 percent of funds for well-rounded education;**
- **Use not less than 20 percent of funds for safe and healthy students;**
- **Use a portion of funds for the effective use of technology;**
 - **Include an assurance that the LEA will not obligate more than 15 percent of these funds to technology infrastructure; and**
- **Accurately report to the State how funds are being used.**

Developing the Budget

Along with their C-1-25, LEAs must develop a budget narrative. A budget narrative is a detailed explanation of the budget and should be able to stand on its own.

Below is an example of a budget narrative entry:

Content Area	Category/Object	Line Item	Calculation	Amount	In Kind	Total
Safe and Healthy Students	School Counseling Services and Wages	SEL Coach	1 Certified SEL Coach at \$70,000/year	\$70,000	N/A	\$70,000

Application Submissions

LEAs should submit their completed application and any supporting documentation to the SEA.

Application items include:

- **1.0 - Consultation**
- **2.0 - Administrative Costs**
- **3.0 - Needs Assessment**
- **4.0 - Well-Rounded Education Activities**
- **5.0 - Safe and Healthy Students Activities**
- **6.0 - Effective Use of Technology Activities**
- **7.0 - Equitable Services**
- **8.0 - Assurances**
- **9.0 - Internet Safety**
- **10.0 - Budget Narrative with C-1-25**

Plan for Implementation

An implementation plan, developed with input from stakeholders, sets up LEAs and schools for success. LEAs should refer back to the activity details outlined in their application while planning for implementation.

Implementation plans are a component of the application's activity details. Other activity details include:

- **Program Objectives**
- **Intended Outcomes**
- **Timeline**
- **Implementation Plan**
- **Evaluation Plan**



Award Phase

Notice of Grant Award

The Notice of Grant Award (NOGA) is the official, legally binding issuance of the award. When the LEA accepts the grant (i.e., by signing the grant agreement or by drawing down funds), the LEA becomes legally obligated to carry out the conditions and the assurances of the grant.

The contents of the NOGA may include—

- **Cover letter**
- **General information**
- **Recipient assurances**
- **Results of SEA risk assessment**



Post-Award Phase

Implement Activities

The selected activities should be implemented effectively so LEAs may achieve identified goals. Part of the implementation process includes monitoring and evaluating the activities and identifying the components that may or may not present barriers.

- **Is the implementation plan being followed as designed? If not, why not?**
- **What mid-course adjustments could be made to improve implementation?**
- **Do resources need to be realigned or timelines adjusted?**

SEA Monitoring

As the pass through for Title IV-A grant funds, the SEA is obligated to proactively monitor sub-recipients (the LEAs) to ensure compliance with federal and State laws and regulations. An accurate risk assessment of each LEA provides critical information to help ensure the effective delivery of program services.

Risk Indicators

- **Total Funding Amount**
- **Application & Award Required Documents**
- **Interim and Final Progress Reports**
- **Program Implementation**
- **Program Deliverables**
- **Spend-down Rate**
- **Grant Change Requests**
- **Internal Audit Findings**
- **Program Review Required Actions**
- **Number of Paid Partners/Vendors**

SEA Monitoring

Risk Level 1

The LEA follows procedures and regulations with little to no trouble

Risk Level 2

The LEA follows procedures and regulations with only minor infractions

Risk Level 3

The LEA follows procedures and regulations with difficulty

Risk Level 4

The LEA does not follow procedures and regulations in many categories

Risk Level 5

The LEA does not follow procedures and regulations in most categories and/or has a documented history of troubled grant management

Please note the purpose of a risk assessment is to identify LEAs who may need additional monitoring and/or technical assistance.

Required Reports

Throughout the implementation of Title IV-A activities, LEAs must submit the following reports:

**Interim Progress Report
(C-1-25-C)**

Every three months

**Final Progress Report
(C-1-25-D)**

Every 24 to 27 months

**Federal Reports
(LEA Use of Funds &
Progress Towards Objectives/Outcomes)**

Every 12 months or annually

Examine and Reflect

Finally, LEAs should examine and reflect on how the selected activities are working. LEAs might examine an activity using performance monitoring or rigorous evaluations. Once examinations are completed, LEAs should make appropriate adjustments to activity implementations.

- **What are reasonable expectations of success for an activity or intervention, and how should success be measured?**
- **What interim progress and/or performance milestones should be collected?**
- **What does the information collected suggest about ways to improve the activity?**

Budget Amendments

After reflecting on implemented activities, LEAs may make amendments as needed. However, amendments should be kept to a minimum to avoid increasing an LEA's future risk assessment score.

Budget amendment – Used to make any revisions to the original proposed budget

Grant extension – A request to extend the grant life

Programmatic change – A change to the implemented program

Reallocation of funds – A change in allocation from one budget line item to another

Other changes – E.g., a change of address, grant manager, or fiscal agent

All budget amendments must be requested/submitted at least 45 days prior to the end of the grant cycle.

Title IV-A In Action

Throughout the State, Title IV-A activities are being implemented by LEAs, schools, and communities.

Some of these activities include:

Well-Rounded Education

- Dual Enrollment
- Equal Opportunity Schools Program
- ArtEd Pro
- Girls Who Code
- Green Schoolyards
- Quaver Music
- Destination Imagination

Safe and Healthy Students

- Social Emotional Learning Coach
- Weight Room Safety Certification
- Restorative Practices
- PATHS
- Stop the Bleed
- Youth Mental Health First Aid
- Second Step

Effective Use of Technology

- ALBERT
- International Society for Technology in Education Certification
- Goalbook Pathways
- PowerSchool
- Screencastify
- Seesaw
- Renaissance Star Math

Conclusion

While the Title IV-A grants have been in effect less than five years and are intended to close the achievement gap resulting from decades-long inequity, the SEA, LEAs, local communities, and other stakeholders may continue to anticipate an upward trend in equitable access to quality education for all students.



Additional Resources

[U.S. Department of Education Non-Regulatory Guidance: Student Support and Academic Enrichment Grant](#)

[Every Student Succeeds Act \(ESSA\), Title IV, Part A Statute](#)

[National Center on Safe Supportive Learning Environments \(NCSSLE\)](#)

[Maryland State Department of Education: Every Student Succeeds Act, Title IV, Part A](#)

[Maryland State Department of Education: Equitable Services State Ombudsman](#)



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