

# Every Student Succeeds Act (ESSA) Title IV, Part A: Student Support and Academic Enrichment (SSAE) Grants



Title IV, Part A Coordinators  
Tuesday, September 25, 2018

# Agenda

1. Welcome and Introductions
2. Review of Funding
3. Attachment #9 - LEA Plan Review
  - a) Allowable Activities – Maryland Examples
  - b) Allowable Use of Funds
  - c) Equitable Services
4. Monitoring
5. Monitoring Tool
6. Updated Timeline
7. FAQ Updates

# Review of Funding

FY 2018: \$5,844,449

**FY 2019: \$16,156,683**

- FY 18 funds should be prioritized for spending before any FY 19 funding
- All FY 18 funding needs to be obligated by June 30, 2019
- All FY 19 funding needs to be obligated by June 30, 2020

# Attachment #9 - LEA Plans

1. Consultation
2. Administrative Costs
3. Needs Assessment
4. Well-Rounded Activities
5. Safe and Healthy Students – (Cross Cutting Activities)
6. Effective Use of Technology
7. Equitable Services
8. Assurances
9. Internet Safety

# 1.0- Consultation

**REMINDER: THIS MUST BE DONE BEFORE THE PLAN IS SUBMITTED**

## 1.0 CONSULTATION – Required

Please provide a description of how the LEA, or consortium of such agencies, meaningfully consulted with parents, teachers, principals, and other school leaders, specialized instructional support personnel, students, community-based organizations, local government representatives (which may include a local law enforcement agency, local juvenile court, local child welfare agency, or local public housing agency), and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of the Title IV, Part A. (ESEA section 4106 (c)(1)).

**DO YOU HAVE THE RIGHT STAKEHOLDERS INVOLVED BASED ON THE NEEDS OF YOUR LEA?**

Please provide a description of how the LEA, or consortium of such agencies, will use ongoing consultation to continually improve the local activities in order to meet the purpose of this subpart. (ESEA section 4106 (c)(2)).

**PLEASE PROVIDE DETAILS & EXAMPLES OF WHAT ONGOING LOOKS LIKE.**

Please provide a description of how the LEA or consortium of such agencies will coordinate the implementation of local activities with other programs, strategies, and activities being conducted in the community. (ESEA section 4106 (c)(2)).

**DRAW CONNECTIONS.**

## 2.0 - Administrative Costs

- LEAs must develop and maintain an **accounting system** for Title IV, Part A funding, ensure **timely submission of interim and final reports**, and/or ensure **proposed costs are permitted** according to terms and conditions of grant, and are **necessary** to for the performance of the project. Position(s) may also monitor expenditures including the private school base.
- Administrative Costs:** Costs associated with expenses incurred by the funded agency to organize, implement, and provide progress reports, including fiscal oversight of expenditures up to **2%**.

<b>2.0 ADMINISTRATIVE COST - Allowable</b>			
Item	Line Item	Description	Public School Costs
2.1			
2.2			
2.3			
2.4			
		Total for Section 2.0	

# 3.0 - 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:

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

Note: An individual LEA receiving an allocation that is less than \$30,000 is not required to conduct a comprehensive needs assessment. (ESEA section 4106(d)(2)).

## 3.0 NEEDS ASSESSMENT- Required

Item	Access to, and opportunities for, a well-rounded education for all students	School conditions for student learning to create a healthy and safe school environment	Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology
3.1	Which stakeholders can help identify local needs and/or root causes? How can they be engaged early and in a meaningful way throughout the process?		
3.2	What data are needed to best understand local needs?		
3.3	Do our current systems fully capture the needs of our hardest to serve students, including those who might experience adversity that might not come up in a survey or other data tools?		
3.4	Are there inequities inherent in the system that are driving some of the local needs?		
3.5	How should the identified needs be prioritized when several significant needs are identified?		

## 3.0 - Needs Assessment Continued

- FY 19 allocations are all > \$30,000 so if you did not complete a needs assessment in FY 18 you will need to for FY 19
- Subsequent needs assessments occur every 3 years
- Last spring a new needs assessment was recommended to assess the increase in funding but is not required



# 4.0 - Activities to Support Well-Rounded Educational Opportunities

- **Purpose: To provide an enriched curriculum and educational experience to all students**
- All LEAs that receive an allocation of at least \$30,000 must use **at least 20 percent** to support well-rounded educational activities
  - *Please remember to follow the format: **DESCRIBE, CITE, & EXPLAIN***

## 4.0 ACTIVITIES TO SUPPORT WELL-ROUNDED EDUCATIONAL OPPORTUNITIES – Required

4.0 ACTIVITIES TO SUPPORT WELL-ROUNDED EDUCATIONAL OPPORTUNITIES – Required				
Item	Each LEA, or consortium of such agencies, that receive an allocation under section 4105(a) must use a portion of such funds to develop and implement programs and activities that support access to a well-rounded education and that are:	Brief Description of Specific Services including: <ul style="list-style-type: none"> <li>• Program Objectives</li> <li>• Intended Outcomes</li> <li>• Timeline</li> <li>• Implementation</li> <li>• Evaluation Plan</li> </ul>	Cite the evidence based study or studies that support this strategy/activity if applicable.	Explanation of how funds will be used (List total at the end)

## 4.0 - Activities to Support Well-Rounded Educational Opportunities – MARYLAND EXAMPLES

- Subsidizing Industry Certification Exams
- Girls-Who-Code Night
- Music Ensemble
- Advanced Placement Exam Study Sessions
- Escape room using STEM
- Using new art mediums not available during the day
- Co-curricular programs across middle schools

## 5.0- Activities to Support Safe and Healthy Students

- **Purpose: To improve school conditions for student learning**
- All LEAs that receive an allocation of at least \$30,000 must use **at least 20 percent** to support safe and healthy initiatives

## 5.0- Activities to Support Safe and Healthy Students – MARYLAND EXAMPLES

- Character Education/Social Emotional Learning Programs
- Professional Development around Restorative Practices
- Sexual Violence Prevention Program
- Bullying Prevention Programs
- Human Trafficking Awareness Campaign
- Multi-Tiered System of Supports
- Drug and Violence Prevention Programs

# 5.0 - Cross-Cutting Activities to Support Safe and Healthy Students

## Overview of Authorized Topics Under Section 4108 of the ESEA \*

### Safe and Supportive Schools

- Bullying prevention
- Relationship building skills
- Dropout prevention
- Re-entry programs and transition services for justice-involved youth
- School readiness and academic success
- Child sexual abuse awareness and prevention
- Reducing use of exclusionary discipline practices and promoting supportive school discipline
- Suicide prevention

### Student Physical and Mental Health

- Drug and violence prevention
- Health and safety practices in school athletic programs
- School-based health and mental health services
- Healthy, active lifestyle
- Nutritional education
- Physical activities
- Trauma-informed classroom management
- Preventing use of alcohol, tobacco, smokeless tobacco, electronic cigarettes
- Chronic disease management

### EXAMPLES

- Activities to reduce incidences of bullying and harassment against all students
- Programs that help students transition from correctional facilities back to school

### Cross-Cutting Authorized Topics

Mentoring and School Counseling  
Schoolwide Positive Behavioral Interventions and Supports  
Pay for Success Initiatives aligned with the Purposes of Title IV

\*NOTE: this chart provides a summary of topics and is not an exhaustive list

## 6.0 - Activities to Support the Effective Use of Technology

- **Purpose: To improve the academic achievement, academic growth, and digital literacy of all students**
- All LEAs that receive an allocation of at least \$30,000 shall use a portion of funds to support the use of technology for students
- Note: Any LEA receiving funds under the SSAE program shall not use more than 15 percent of the portion of funds allotted for supporting the effective use of technology to purchase technology infrastructure
  - *Please note that the 15 % rule only applies to funds used in this content area **not the total allocation***

## 6.0 - Activities to Support the Effective Use of Technology - MARYLAND EXAMPLES

- Professional Development on Blended and Personal Learning v. Tech Enhanced Learning
- Professional Development on using technology in the classroom
- Google Certification Camps
- Digital Integration Workshops
- Software Purchases
- Laptop and tablet Purchases

# 4.0, 5.0, & 6.0 – Other Allowable Activity Examples

## Overview of Examples of Allowable SSAE Uses of Funds\*

Well-Rounded Educational Opportunities (ESEA section 4107)	Safe and Healthy Students (ESEA section 4108)	Effective Use of Technology (ESEA section 4109)
<ul style="list-style-type: none"> <li>Improving access to foreign language instruction, arts, and music education</li> <li>Supporting college and career counseling, including providing information on opportunities for financial aid through early FAFSA</li> <li>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</li> <li>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</li> <li>Strengthening instruction in American history, civics, economics, geography, government education, and environmental education</li> </ul>	<ul style="list-style-type: none"> <li>Promoting community and parent involvement in schools</li> <li>Providing school-based mental health services and counseling</li> <li>Promoting supportive school climates to reduce the use of exclusionary discipline and promoting supportive school discipline</li> <li>Establishing or improving dropout prevention</li> <li>Supporting re-entry programs and transition services for justice-involved youth</li> <li>Implementing programs that support a healthy, active lifestyle (nutritional and physical education)</li> <li>Implementing systems and practices to prevent bullying and harassment</li> <li>Developing relationship building skills to help improve safety through the recognition and prevention of coercion, violence, or abuse</li> <li>Establishing community partnerships</li> </ul>	<ul style="list-style-type: none"> <li>Supporting high-quality professional development for educators, school leaders, and administrators to personalize learning and improve academic achievement</li> <li>Building technological capacity and infrastructure</li> <li>Carrying out innovative blended learning projects</li> <li>Providing students in rural, remote, and underserved areas with the resources to benefit from high-quality digital learning opportunities</li> <li>Delivering specialized or rigorous academic courses and curricula using technology, including digital learning technologies and assistive technology</li> </ul>

\*Note: this table provides examples of allowable activities and is not an exhaustive list.



# Other Allowable Activities – Reminders

## Other Requirements Related to Allowable Activities

- Comprehensive needs assessment
- Application Assurances
  - Use of funds
  - Prioritizing the distribution of funds to schools
- Stakeholder engagement
- Supplement not supplant provisions
- Federal civil rights laws

## Uniform Guidance: Cost Principles

Under 2 CFR 200.403 the Uniform Guidance cost principles apply to the use of SSAE program funds, including the standards below:

- Necessary and reasonable
- Allowable
- Allocable to the program
- Adequately documented

Retrieved from: [https://safesupportivelearning.ed.gov/sites/default/files/TitleIVPartA\\_SSAE\\_NonRegGuid\\_webinar3\\_02%2009%2017.pdf](https://safesupportivelearning.ed.gov/sites/default/files/TitleIVPartA_SSAE_NonRegGuid_webinar3_02%2009%2017.pdf)

# Steps to Determine Allowable Activities

1. Consider whether the activity aligns with the PURPOSE of one of the 3 content areas
2. Is the activity aligned with cost principles, i.e., necessary, reasonable, allowable, and allocable
3. Is the funding of the activity supplanting any local or non-Federal funding?
4. Is the activity one of the listed prohibited use of funds?

# Prohibitions

## Prohibitions in ESEA, Title IV, Part A

- No funds under this title may be used for medical services or drug treatment or rehabilitation, except for integrated student supports, specialized instructional support services, or referral to treatment for impacted students, which may include students who are victims of, or witnesses to, crime or who illegally use drugs.
- No child shall be required to obtain a prescription for a controlled substance, as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802) as a condition of—
  - receiving an evaluation or other service described under this title;
  - attending a school receiving assistance under this title.

## Prohibitions in ESEA, Title VIII

- No ESEA funds may be used—
- for construction, renovation, or repair of any school facility, except as authorized under this Act;
- for transportation unless otherwise authorized under this Act;
- to develop or distribute materials, or operate programs or courses of instruction directed at youth, that are designed to promote or encourage sexual activity, whether homosexual or heterosexual;
- to distribute or to aid in the distribution by any organization of legally obscene materials to minors on school grounds; to provide sex education or HIV-prevention education in schools unless that instruction is age appropriate and includes the health benefits of abstinence; or
- to operate a program of contraceptive distribution in schools.

(Section 8526 of the ESEA, as amended by ESSA)

For more information, please refer to the [Non-Regulatory Guideline](https://safesupportivelearning.ed.gov/sites/default/files/TitleIVPartA_SSAE_NonRegGuid_webinar3_02%2009%2017.pdf) found at [https://safesupportivelearning.ed.gov/sites/default/files/TitleIVPartA\\_SSAE\\_NonRegGuid\\_webinar3\\_02%2009%2017.pdf](https://safesupportivelearning.ed.gov/sites/default/files/TitleIVPartA_SSAE_NonRegGuid_webinar3_02%2009%2017.pdf)

# 7.0 - Equitable Services

## 7.0 EQUITABLE SERVICES TO STUDENTS IN PRIVATE (NONPUBLIC) SCHOOLS [ESEA, SECTION 8501]:

Equitable Services: Services and other benefits to private school students must be secular, neutral, and non-ideological (Sec. 8501(a)(2)), must be provided in a timely manner, and must be equitable in comparison to services and other benefits for public school children, teachers, and other educational personnel (Sec. 8501(a)(3)(A)). To help ensure such equity, the state education agency must designate an ombudsman to monitor and enforce the requirements relating to the participation of children in private schools (Sec. 8501(a)(3)(B)).

Participating Private Schools and Services: Provide information regarding the calculated cost per pupil, that will benefit from Title IV-A services. (Include below or as an attachment)

Describe the school system's written process to invite private schools to the initial consultation meeting, provide on-going consultation, and manage disputes and/or complaints.

- **CONSULTATION MUST OCCUR BEFORE THE LEA PLAN IS SUBMITTED**
- Still awaiting USDE decision regarding the inclusion of all nonpublics
- Any disputes or complaints should be sent to MSDE Equitable Services Ombudsman, Ms. Scherr  
410-767-0291  
[barbara.scherr@maryland.gov](mailto:barbara.scherr@maryland.gov)

For more information, please visit the [Equitable Services Ombudsman](http://www.marylandpublicschools.org/about/Pages/DSFSS/EquitableServices/Index.aspx) webpage at <http://www.marylandpublicschools.org/about/Pages/DSFSS/EquitableServices/Index.aspx>

# 8.0 - Assurances

## **8.0 ASSURANCES [ESEA, SECTION 4106(E)(2)]:**

**In accordance with ESEA section 4106(e) (2) and (f), an LEA or consortium of LEAs must assure in its application that it will:**

- (A) prioritize the distribution of funds to schools served by the local educational agency, or consortium of such agencies, that—
    - (i) are among the schools with the greatest needs, as determined by such local educational agency, or consortium;
    - (ii) have the highest percentages or numbers of children counted under section 1124(c);
    - (iii) are identified for comprehensive support and improvement under section 1111(c)(4)(D)(i);
    - (iv) are implementing targeted support and improvement plans as described in section 1111(d)(2); or
    - (v) are identified as a persistently dangerous public elementary school or secondary school under section 8532;
  - (B) comply with section 8501 (regarding equitable participation by private school children and teachers);
  - (C) use not less than 20 percent of funds received under this subpart to support one or more of the activities authorized under section 4107;
  - (D) use not less than 20 percent of funds received under this subpart to support one or more activities authorized under section 4108;
  - (E) use a portion of funds received under this subpart to support one or more activities authorized under section 4109(a), including an assurance that the local educational agency, or consortium of local educational agencies, will comply with section 4109(b); and
  - (F) annually report to the State for inclusion in the report described in section 4104(a)(2) how funds are being used under this subpart to meet the requirements of subparagraphs (C) through (E).
- (f) **SPECIAL RULE.**—Any local educational agency receiving an allocation under section 4105(a)(1) in an amount less than \$30,000 shall be required to provide only one of the assurances described in subparagraphs (C), (D), and (E) of subsection (e)(2).

# 9.0 - Internet Safety

## **9.0 INTERNET SAFETY [ESEA, SECTION 4121]:**

**No funds made available under this part to a local educational agency for an elementary school or secondary school that does not receive services at discount rates under section 254(h)(5) of the Communications Act of 1934 (47 U.S.C. 254(h)(5)) may be used to purchase computers used to access the Internet, or to pay for direct costs associated with accessing the Internet, for such school unless the school, school board, local educational agency, or other authority with responsibility for administration of such school both—**

(1)(A) has in place a policy of Internet safety for minors that includes the operation of a technology protection measure with respect to any of its computers with Internet access that protects against access through such computers to visual depictions that are—

- (i) obscene;
- (ii) child pornography; or
- (iii) harmful to minors; and

(B) is enforcing the operation of such technology protection measure during any use of such computers by minors; and

(2)(A) has in place a policy of Internet safety that includes the operation of a technology protection measure with respect to any of its computers with Internet access that protects against access through such computers to visual depictions that are—

- (i) obscene; or
- (ii) child pornography; and

(B) is enforcing the operation of such technology protection measure during any use of such computers.

(A) **SCHOOLS WITH INTERNET SAFETY POLICIES AND TECHNOLOGY PROTECTION MEASURES IN PLACE.**—A local educational agency with responsibility for a school covered by subsection (a) that has in place an Internet safety policy meeting the requirements of subsection (a) shall certify its compliance with subsection (a) during each annual program application cycle under this Act.

By checking this box the LEA certifies that it is in compliance with the internet safety policies and technology protection measures.

# 10.0 – Budget Narrative

**Remember to follow the templates.**

**You should use the format as shown in one of the two following templates:**

Category/ Object	Line Item	Calculation	Amount	In- Kind	Total
Instructional staff Development Salaries & Wages	Stipends for professional development strategy #	300 participants x \$120	\$36,000		\$36,000
Fixed Charges	FICA	7.65% x \$36,000	\$2,754		\$2,754

Category/ Object	Line Item	Calculation	Amount	In-Kind	Total
Activity 1.1					
203-205 – 02 / 01	Stipends for professional development strategy #	300 participants x \$120	\$36,000		\$36,000
212 / 04	FICA	7.65% x \$36,000	\$2,754		\$2,754

**It is helpful to organize by content area, i.e. 4.0, 5.0, & 6.0.**

# Monitoring

- Monitoring of Federal Grants is required under the
  - Code of Federal Regulations (CFR § 200 – Uniform Guidance)
  - Education Department General Administrative Regulations (EDGAR § 200.331)
- The MSDE is required to:
  - Perform a **risk assessment** (sample criteria below):
    - Prior experience with same or similar sub-awards
    - On-time reporting, i.e., interim progress reports
    - Whether new personnel or new or substantially changed systems
    - Dollar Amount allocated
    - Number and dollar amount of contracted services with vendors
  - We have completed year 1 risk assessments using the same risk assessment tool from the other Title programs
    - Risk Assessment scores and letters will be sent with FY 19 NOGAs



# Monitoring Continued

- The MSDE is required to:
  - Monitor as necessary to ensure the sub-award is used for authorized purposes, which may include:
    - Reviewing financial and programmatic reports, i.e.,
      - Interim Progress Reports
      - Annual Financial Report (AFR)
    - Ensure timely and appropriate action to correct all deficiencies
    - Issue management decision for audit findings
  - Use the following monitoring tools to ensure proper accountability and compliance with program requirements and achievement of performance goals
    - Training and technical assistance
    - On-site reviews
    - Arranging other agreed upon procedures



# Monitoring Tool

**Directions:** For each section, please provide support such as a narrative or statement, an artifact (paper or electronic), an internet link, copies of records, or other documents. Please reflect on the activities, objectives, and outcomes listed in your previously submitted plans (Attachment 9). Please use the ***bolded and italicized*** prompts to prepare your responses.

Required and Approved Activities	LEA Response: Narrative or Statement & Evidence or Artifact
<b>1.0: CONSULTATION - (Required)</b>	
<b>1. How has the LEA demonstrated meaningful consultation with parents, teachers, principals, and other school leaders, specialized instructional support personnel, students, community-based organizations, local government representatives (which may include a local law enforcement agency, local juvenile court, local child welfare agency, or local public housing agency), and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of the Title IV, Part A. (ESEA section 4106 (c)(1))?</b>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<b>2. How has the LEA demonstrated ongoing consultation to continually improve the local activities in order to meet the purpose of this subpart. (ESEA section 4106 (c)(2))?</b>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<b>3. How has the LEA demonstrated coordinated implementation of local activities with other programs, strategies, and activities being conducted in the community (ESEA section 4106 (c)(2))?</b>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
<b>3. (Continued from above)</b>	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

# Timeline

- **May 23, 2018:** Preliminary DRAFT LEA Allocations were provided
- **July 1, 2018:** Fiscal Year 19 begins
- **August 2018:** LEAs received final notice of FY 19 allocation amount
- **September 15, 2018** Interim Report Due for FY 2018 Grant (and every 3 months thereafter) – ALL LEAs HAVE SUBMITTED AS OF 09/25/18
- **October 15, 2018:** Title IV Plans for FY 2019 are due with Master Plans
- **November-December 2018:** State Superintendent approval of Plans
- **December 2018:** Notice of Grant Awards are distributed
- **January 2019** – On-site visits will start (tentatively)
- **June 30, 2019:** Final Report (AFR) for FY 2018 Grant is due
- **June 30, 2020:** Final Report (AFR) for FY 2019 Grant is due
  - AFR is the last sheet on the **C-1-25-D**

***PLEASE NOTE THAT ALL DATES ARE APPROXIMATIONS***

# FAQ Updates

## Questions Answered From U.S. Dept. of Ed.

- Q: AP Exams, i.e., One of the allowable uses of Title IV, Part A funds is to pay for low income students AP and IB assessments. At one time the State had a grant that did that which is no longer available so we have recommended to our local school systems that they use Title IV Part A funds for this. However, one school system had already picked up the costs themselves, at this point would they be able to use Title IV Part A funds for that or would it be supplanting?

U.S Department of Education Ruling on Title IV, Part A & AP Exam Fees		
<b>Looking Back</b>	<b>State FY 18 Title IV, Part A Funds – CAN REIMBURSE</b>	<b>SY 2016 – 17 AP EXAM FEES SY 2017 – 18 AP EXAM FEES</b>
<b>*Special Note: State FY 19 CANNOT reimburse SY 2016-17 – nor SY 2017-18 AP EXAM FEES but...</b>		
<b>Moving Forward</b>	<b>State FY 19 Title IV, Part A Funds – CAN FUND</b>	<b>SY 2018 – 19 EXAM FEES &amp; BEYOND</b>

- Q: It is our current understanding, based on conversation at the July Joint Titles conference, that infrastructure includes:
  - Hardware (computers, networking equipment, iPads, printers, etc.)
  - Installed software (iPad apps, student information system software, etc.
  - But does not included digital subscription services designed to provided enhanced learning opportunities for students
  - (i.e. Gizmos for Science, etc.)

**A. Agreed. This is consistent with ESEA sections 4109(a)(2)(B) and 4109(b).**
- If a nonpublic school qualifies for Title I funds but elects not to accept them or participate in the Title I program, can they still receive Title IV, Part A funds?
 

**A. “Yes, students in a nonpublic school may receive services under Title IV, Part A, regardless of whether the nonpublic school qualifies for Title I services. Receipt of Title I services by a nonpublic school is not a prerequisite for equitable participation under Title IV, Part A.”**

# FAQ Updates Continued

## Questions Still Pending From U.S. Dept. of Ed.

- Nonpublic participation, i.e., Does a nonpublic school have to receive title I services to be eligible for title IV? Be title I eligible? Have title I eligible students? We are trying to determine if all nonpublics can participate in title IV.
- For the LEAs, for the 2 areas where at least 20% must be allocated, is this at least 20% of the full allocation or 20% after the administrative and equitable services costs are removed?
- Are indirect costs to be taken out before accounting for the 20%, 20%, and 15% allowances?
- **WE ARE STILL WAITING FOR MORE ANSWERS AND UPDATES**
- **If you have new questions please submit via the message board. We will collect them and share them with ED.**

# Questions?

JONATHAN TURNER  
LEAD SPECIALIST- SCHOOL COUNSELING  
STATE DIRECTOR FOR TITLE IV, PART A  
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