

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

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, local education 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, and
- 3) Improve the use of technology in order to improve the academic achievement and digital literacy of all students. ESSA 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. ESSA 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 ESSA Section 4105(c).

In GMAP, there are multiple project codes on the budget page. When we code purchase orders (POs) to our Title IV, Part A funds, do we need to use those same project codes in MUNIS?

Yes, the district must use the same project codes in MUNIS. The budget in MUNIS must be set up in the same manner in which funds have been budgeted in GMAP.

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

The narrative description should include as much information as possible for how funds will be spent to help the state education agency (SEA) determine if the expense is reasonable and allowable under Title IV, Part A. For code 0610, General Supplies, the LEA needs to include a list of the types of items and materials that will be purchased in the description.

The application has been approved, but the district plan has changed. What does the district need to do?

If the district needs to make any changes to the approved application the district should first contact their Title IV, Part A consultant at KDE to discuss the changes to ensure they are allowable. Once the changes are determined to be allowable, the district must revise the Title IV, Part A application and have the changes approved before they can allocate funds to the new activity. (2 CFR 200.308(c))

COMPREHENSIVE NEEDS ASSESSMENT

Are districts required to complete a Comprehensive Needs Assessment?

ESSA Section 4106(d) requires that an LEA receiving an SSAE program allocation of at least \$30,000 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; and,
- 3) Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.

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. LEAs should look at local data (i.e. survey results, test scores, safety assessments, etc.) to determine what area needs to be addressed within the district to determine how to utilize Title IV, Part A funds. There is also a resource document on the [KDE Title IV, Part A](#) website that districts may also find beneficial.

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 must include data, survey results, or other information that indicated a need for the district. The district should describe the results of the needs assessment for each content area (well-rounded education, safe and healthy students, and effective use of technology). The needs assessment does not need to be uploaded or attached to the application, but the district must have a copy of the Needs Assessment on file in the District Office for auditing purposes. When the district selects the activities, the activities must align with a need identified in the district's comprehensive needs assessment. Please see the [Needs Assessment Planning Guide](#) for additional information.

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](#).

Can the Needs Assessment just be attached to the application or can a link to the data be added in instead of describing the results on the Needs Assessment page?

No, the district must describe the results of the needs assessment, include the name of the needs assessment used, and the date the needs assessment was conducted. A description of the results must include what information lead to the decision for how funds will be used. While a district may have priorities, those priorities should be data-driven. The application is asking for the data that was collected that would guide the priorities for how Title IV, Part A funds will be used. A copy of the needs assessment that is used must be available at the district office for audit purposes.

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 Title IV, Part A-funded activities in private schools located within the district's boundaries. LEAs must engage 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 services to private schools are appropriate.

For additional information on what is required for private school consultation, please see the [Title IX, Part E Non-Regulatory Guidance](#).

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

A private school cannot purchase technology as only the LEA can expend federal funds on behalf of a private school. Technology can, though, be purchased by the LEA on behalf of the private school but must follow the 15% Special Rule, which states that no more than 15% of the funds in the Effective Use of Technology category is spent on devices (not 15% of the entire allocated amount). If the technology purchase is to directly support an initiative under the Well-Rounded Education or Safe and Healthy Students sections of the grant then funds may be used if those items are for direct support for initiatives that are allowable. Purchases for general educational use must follow the 15% Special Rule under the Effective Use of Technology section of the grant. General education use items typically include, but are not limited to, general educational online software, Chromebooks, tablets or iPads, and other hardware or software that is for general educational purposes and not to target a specific content area need.

Does the private school need to be serviced in all three sections of the grant if the LEA receives \$30,000 or more in funds?

No, the amount of services a private school receives is dependent on the service amount that is allocated to the private school. For example, if a private school receives \$1,000 in services, the private school can decide to request services in any or all sections of the grant. Only if a private school receives over \$30,000 in services are they required to receive services in all three sections of the grant. Under no circumstances can the LEA give the private schools the money in place of providing services or resources to the private school. The LEA must remain the fiscal agent for any services the private school receives.

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% 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% 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% of funding in this content area on devices, equipment, software applications, platforms, digital instructional resources and/or other one-time IT purchases. ESSA 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 ESSA);
- 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. ESSA Section 4106(e)(2)(A). (This currently does not apply in Kentucky.).)

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

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?

Districts can use Title IV, Part A funds to cover AP test fees for students who 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. Additionally, if districts typically covered this cost with state or local funds, then they cannot use federal funds.

Title IV, Part A funds cannot be used to cover dual credit course fees for students qualifying for free and reduced lunch as it would be considered supplanting.

Can funds be used for course fees needed for students in dual credit programs?

Kentucky has a policy (702KAR 3:220) that all course fees for free and reduced lunch students must be paid by the school district.

Does this include dual credit fees if these fees are paid to an outside agency to provide those courses?

These fees are typically high in cost and could deter students from enrolling or districts being able to afford offering courses, especially in rural and impoverished areas

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 funds be used for student incentives for PBIS?

Under ESSA, federal funds may be used for incentives so long as the incentives are nominal and are tied to student achievement. To justify these types of incentives, they must be both "necessary and reasonable." Purchasing incentives for students is very restrictive and limited in the scope of types of items that can be purchased and therefore discouraged. There are several no cost incentives that can be given for PBIS, and LEAs are encouraged to explore these options first before attempting to use Title IV, Part A funds for PBIS incentives. There are several free or inexpensive rewards suggested for individual students at the [OSEP PBIS TA Center](#) website.

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 15% Special 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. The 15% Special Rule only applies to technology related purchases in the Effective Use Technology component. 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 and is not included in the 15% Special Rule.

Are Title IV, Part A Funds for PE Equipment Allowable?

In general, the purchase of physical education equipment is an allowable use of funds under the safe and healthy student content area. To be funded, the purchase of equipment should have been informed by the school district's needs assessment, stakeholder engagement process, and prioritization of schools. As with any cost charged to a grant, grantees are responsible for ensuring that only costs that are reasonable, necessary, and allocable to the grant are in fact charged to the grant. If the program has a supplanting prohibition, which the Title IV-A program does, the grantee must ensure that the use of Title IV-A funds supplements, and does not supplant, other state or local funds that would otherwise be used to pay for the allowable activity. The district must also have a method to inventory items purchased with federal funds.

Can Title IV-A funds be used to purchase security cameras for school buses or campuses?

In general, the purchase and installation of security cameras is allowable under the Title IV, Part A program consistent with one of the three main purposes of the statutory program—supporting safe and healthy students. To be funded, these activities should be consistent with the school district's needs assessment, be a “reasonable and necessary cost,” and be consistent with the local application approved by the SEA in this State-administered program. Title IV, Part A program funds can be used by a school district to purchase security cameras provided that a number of primarily statutorily required considerations are met as described below. Title IV, Part A is a state-administered formula grant program; therefore, the SEA must review a local districts or LEA's application to determine whether activities proposed by an LEA are allowable, and consistent with the requirements that govern the program. Assuming that the comprehensive local needs assessment (required under [ESEA Section 4106](#) for LEAs with allocations of at least \$30,000) and local stakeholder consultation indicate that security cameras are a significant LEA need, the SEA determines whether such costs meet the purposes of one of the three content areas in the Title IV, Part A program (well-rounded education in section 4107, safe and healthy students in section 4108, or the effective use of technology in section 4109). In this case, security cameras would support the purposes of the safe and healthy students content area as they can foster a safe school environment.

(See [ESEA Section 4108\(3\)](#)). There are further determinations on the allowability of the costs in accordance with the general government-wide cost principles in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at 2 CFR Part 200, Subpart E, that costs are reasonable and necessary for the performance of the grant award. 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 otherwise allowable activity, in this case security cameras. Finally, LEAs and SEAs must check to ensure that the activity is not one of the prohibited activities in section 4001(b) or 8526 of the ESEA. In particular, construction is not authorized under Title IV, Part A. Thus, allowable activities regarding the condition of a school building must fall into the

definition of “minor remodeling” to be allowable. See 34 CFR 77.1(b). The installation of security cameras would generally constitute a minor alteration in a previously completed building and therefore would be allowable under the definition of minor remodeling.

Is this an allowable use under Safe and Healthy students to provide monthly random drug testing of 20% of students participating in extra-curricular activities?

Drug testing for this purpose is not prohibited by statute, so an SEA/LEA must follow the standard allowability analysis—see below. However, even if this is determined to be an allowable use of funds, drug testing for students raises significant legal concerns. There are Federal constitutional concerns which would determine the parameters of such testing, and there are likely similar State constitutional concerns. Any SEA considering this use of funds should consult with their attorney to be sure any program does not violate these provisions and meets all legal requirements.

Allowability analysis: A State educational agency (SEA) determines allowability of funds for program costs in an LEA’s application based on a number of factors, starting with whether all statutory requirements are met. Assuming that the activity is consistent with the purposes of one of the three content areas, as applicable, the SEA should 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, 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 prohibits supplanting, the SEA should consider whether the proposed use of funds for the activity is supplemental and would not supplant other State or local funds that would otherwise be used for the activity in the absence of the SSAE program funds. In determining whether this proposed use of funds may be provided as equitable services, the LEA has some additional considerations and responsibilities.

A private non-public school is considering purchasing memberships for students at a fitness center that is next door to the school to provide PE credits. Is this an allowable use of Title IV funds?

It is unlikely that this would be allowable. First, this raises potential supplanting issues, if the purpose is to provide activities that meet State PE requirements. Further, is this reasonable, necessary, and allocable to the program? How and why? Would student use of the fitness center somehow be monitored to ensure that the use of these funds for this purpose remains consistent with Title IV, Part A?

If the state has a law, regulation or policy that requires LEAs to pay the course fees for school-sponsored courses, activities, programs, events or services for low-income students, there is a presumption that the use of Title IV, Part A funds for the fees associated with accelerating learning courses would violate the Title IV, Part A supplement not supplant requirement.

Can Title IV, Part A support a culinary arts program within a district. The needs assessment identified the need to provide more support to their culinary arts career pathway. The district would like to purchase three-compartment sinks to replace the existing sinks to try to replicate more of a restaurant. Would the purchase of the sinks be allowable with Title IV, Part A funds?

Purchasing equipment and/or supplies for a culinary arts program appears to be an allowable use of funds under the Title IV-A program. The State would still need to determine if the activity is allowable by applying the following steps: 1) consistent with one of the three content areas (this appears to be allowable under the well-rounded education content area); 2) reasonable and necessary for the performance of the grant; 3) allocable to the grant; 4) supplements, and does not supplant, other State or local funds that would otherwise be used to pay for the sinks; and 5) not one of the prohibited activities in ESEA Section 4001(b) or Section 8526. In addition, given the prohibition against the use of Title IV, A funds for construction, any installation of the equipment would need to be carefully reviewed.

Can Title IV, Part A support student wages during school hours?

This would be an allowable activity for the students to participate. As far as whether they can participate during the school day that would have to be cleared with the authorities of the school or your school district. We know there are certain hours required for students to have educational instruction and it would be up to them to determine how to monitor that.

Can Title IV, Part A support student transportation?

Travel expenses for students including transportation are considered “participant support costs” (2 CFR 200.75) and are generally allowable. Similarly, the SEA will need to determine the allowability of the specific proposed expenditure pursuant to Title IV, Part A. However, these “participant support costs” are only allowable with the prior written approval of the Federal awarding agency. The specific regulations regarding participant support costs can be found at 2 CFR 200.75 and 2 CFR 200.456 and should be reviewed.

Can Title IV, Part A support a School Resource Officer (SRO)?

Please see our [KDE Title IV, Part A website](#) for updated SRO guidance based on changes in legislation.

Can Title IV, Part A support a drug canine in the Safe and Healthy Students component?

This would not be an allowable expense as it should be an evidence-based program or activity based upon identified needs. A drug dog would not support the intent of Title IV, Part A in creating a safe and supportive learning environment under ESEA section 4108. Funds must be utilized for a program or activity for "fostering a safe, healthy, supportive, and drug-free

environment that supports academic achievement." (ESEA section 4108(a)(2)). This expense is not reasonable, necessary, or allocable as it does not meet the intent of the grant.