

## Questions & Answers

### Title IV, Part A, Student Support and Enrichment (SSAE) Grants<sup>1</sup>

#### General Requirements

##### 1. *What is the purpose of the 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 state education agencies (SEAs), 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. (ESEA section 4101).

##### 2. *What are the local application requirements for LEAs?*

The Title IV, part A funding application is part of the Consolidated Funding Application (CFA). An LEA 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).

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<sup>1</sup>Answers 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. Federal guidance and resources on Title IV, Part A can be found [here](#).

## Needs Assessment

### **3. *Are LEAs 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 needs assessment prior to receiving its allocation, and subsequent needs assessments at least once every three years. Tennessee requires that all districts complete a needs assessment yearly as part of their LEA plan. For Title IV purposes, the needs assessment should examine the district's ability to provide:

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.

In addition to information provided in the district needs assessment, narrative questions that speak to well-rounded educational opportunities, safe and healthy students, and the effective use of technology must be addressed within the Title IV, part A section of the CFA.

### **4. *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).

## Distribution of Funds

### **5. *How are allocations to private schools within the LEA 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 the LEA's attendance zone. LEAs must engage in timely and meaningful consultation with private school officials during the design and development of their Title IV, Part A programs.

LEAs that have private schools that choose to participate in Title IV, Part A must complete the Equitable Non-Public Services portion of the application (on the program details page) that will calculate the equitable services amount and then upload the Affirmation of Meaningful Private School Consultation form to the related documents section of the Title IV, part A application.

### **6. *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 all of the funds be used in just 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 all three areas of focus, and must be based on the results of a needs assessment in the areas that the grant is designed to target. It is possible that one initiative developed by an LEA could overlap in multiple 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 percent of funding for activities to support well-rounded education opportunities, at least 20 percent 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, funds can be spent in any of the

three areas.

**7. What is the 15 percent special rule under the Effective Use of Technology area?**

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 may not spend more than 15 percent of funding in this focus area on **devices, equipment, software applications, platforms, digital instructional resources and/or other one-time IT purchases** (ESEA section 4109(b)). At least 85 percent of the educational technology funds must be used to support professional learning to enable the effective use of educational technology.

**8. Does the 15 percent special rule apply to the entire SSAE allocation or just the funding allocated for the Effective Use of Technology area?**

The 15 percent special rule does not apply to the total SSAE subgrant, it only applies to funding allocated to the Effective Use of Technology area. For example, if an LEA receives \$30,000 in Title IV funding and allocates \$10,000 for the Effective Use of Technology, only \$1,500 may be spent on technology infrastructure.

**9. 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:

- Are among the schools with the greatest needs;
- 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);
- Are identified for comprehensive support and improvement under section 1111(c)(4)(D)(i) (i.e., are among the lowest achieving schools);
- Are implementing targeted support and improvement plans as described in section 1111(d)(2)(i.e., have consistently underperforming student subgroups); or
- Are identified as a persistently dangerous public elementary school or secondary school under section 8532 (ESEA section 4106(e)(2)(A)).

**10. Can funds be used in non-Title I schools? For example, can an LEA hire a district-level counselor to work with all of their high schools?**

Yes, SSEA funds may serve all students, they are not limited to Title I schools. An LEA may use funds for college and career counseling programs and services under the area of well-rounded educational opportunities. That could include hiring a district-level counselor who coordinates and supports supplemental college and career counseling activities in collaboration with community organizations and institutions of higher education. District-wide activities under the grant should focus on supporting schools enrolling children with the greatest identified need(s).

**11. What does supplement not supplant mean in context to 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.

## **Allowable Use of Funds**

### **12. How will the department determine whether proposed activities in an LEA application are allowable under the SSAE program?**

LEAs will submit applications to the department as part of the CFA. Proposed activities must be informed by the needs assessment (required of all Tennessee school districts), stakeholder engagement, and prioritization of schools.

The department'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, the department 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 opportunities, safe and healthy students, or the effective use of technology). Assuming that the activity is consistent with the purposes of one of the three content areas, as applicable, the department must make further determinations as to the allowability of costs in accordance with the cost principles in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance).

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). In addition, 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).

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

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

### **14. Can an LEA use SSAE funds for a school resource officer (SRO)?**

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

### **15. May SSAE funds be used for coordinator salaries for programs like positive behavior interventions and supports (PBIS) and youth mental 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.

**16. *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.

**17. *Can an LEA use SSAE funds to support activities in preK programs?***

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

**18. *Are field trips allowable activities for well-rounded educational opportunities?***

Yes, field trips could be considered if they are consistent with the purposes of a well-rounded education, are evidence-based, support the identified needs resulting from the LEA needs assessment, and are for prioritized schools.

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

No, the ESSA 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.

**20. *Can an LEA use SSAE funds to purchase computers, educational software, and digital/online resources?***

Software, computer, and digital/online resources are allowable under Title IV, Part A. However, technology purchases are subject to the 15 percent special rule. LEAs may not spend more than 15 percent of funding in this focus area 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."