TITLE IV, PART A STUDENT SUPPORT AND ACADEMIC ENRICHMENT CAPACITY BUILDING TRAINING FOR THE LEA

OFFICE OF ESSA-FUNDED PROGRAMS
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2022

Title IV, Part A Capacity Building Overview

Title IV-A Topics

➢ Purpose

➢ LEA Funding Eligibility

➢ Transferability of Title IV-A Funds

➢ Title IV-A Program Overview

➢ Statutory Spending Requirements for Title IV-A Funds

➢ Carryover of Funds

➢ Commonly Asked Questions

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Title IV, Part A Capacity Building Training

Purpose and Audience

➢ To provide technical assistance to LEAs to broaden their understanding of Title IV-A obligations and program requirements.

➢ To improve the accuracy of Title IV-A program information submitted in the Consolidation Application for ESSA-Funded Programs and budget amendments.

Title IV, Part A Capacity Building Training

Title IV, Part A: Eligibility Overview

➢ Title IV-A funds are allocated to all LEAs that received Title I, Part A in the preceding fiscal year.

➢ The minimum Title IV, Part A allocation for an LEA is $10,000.

➢ LEAs with an allocation of $30,000 or more are required to conduct a ***comprehensive needs assessment*** once every three years to examine the needs for improvement of well-rounded educational opportunities, school conditions for student learning, and access to personalized learning experiences supported by technology.

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Title IV, Part A: Eligibility Overview

➤ LEAs must consult and collaborate with required stakeholders in order to **receive Title IV, Part A funds** and **plan the Title IV-A program activities** described in the Consolidated ESSA Application.

➤ LEAs must provide equitable services to eligible non-public schools.

➤ LEAs must engage in on-going consultation with the non-public schools about the funded activities in the Consolidated Application regarding program objectives and intended outcomes.

➤ LEAs will periodically evaluate the effectiveness of the activities based on such objectives and outcomes.

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Transferability of Title IV, Part A Funds

➤ Up to 100% of an LEA's Title IV, Part A allocation may be transferred to another eligible program (Title I-A, Title I-C, Title I-D, Title II-A, Title III-A, or Title V-B).

➤ Prior to transferring Title IV-A funds, LEAs must consult with required stakeholders and in-district private schools.

➤ LEA must provide private school equitable services under the program(s) to which the funds are transferred into based on the total amount of available funds after transfer.

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Transferability of Title IV, Part A Funds

➢ If an LEA has an allocation of $30,000 or more, the LEA must do the following prior to transferring funds to another eligible program:

  ➢ Conduct a Comprehensive Needs Assessment to inform the transfer of funds;

  ➢ Engage in timely and meaningful consultation with appropriate private school officials;

  ➢ Provide private school equitable services under the program(s) to which the funds are transferred into based on the total amount of available funds after transfer.

➢ If the transfer results in a final allocation below $30,000, the LEA does not need to follow the statutory spending requirement for distribution of funds across content areas. The EUT special rule still applies.

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Transferability of Title IV, Part A Funds

➢ If an LEA transfers funds into Title IV causing the new Title IV allocation to increase to $30,000 or more, the LEA must abide by statutory spending requirements across content areas.

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Title IV, Part A: Program Overview

Title IV, Part A of the Every Student Succeeds Act of 2015 is intended to improve students' academic achievement by increasing the capacity of States, local educational agencies (LEAs), schools, and local communities to provide all students with access to a well-rounded education, improve school conditions for student learning, and improve the use of technology in order to improve the academic achievement and digital literacy of all students.

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Title IV, Part A: Program Overview

➢ All programs and activities funded under Title IV, Part A for **LEAs and eligible non-public schools** must be based on **identified needs** described in the Consolidated Application for ESSA-Funded programs and shall be **programmatically aligned** with one or more of the three Title IV-A content area programs:

➢ Well-rounded education (WRE)

➢ Safe and healthy students (SHS) and

➢ Effective use of technology (EUT).

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Title IV, Part A: Program Overview

➢ What does it mean to be programmatically aligned?

  ➢ Budget expenditures must be aligned to the content areas use of funds as planned for in the Consolidated ESSA Application. (Best practice is for LEAs to label expenditures by content area.)

  ➢ Supplies and Materials (particularly EUT content area expenditures) must be itemized and described.

  ➢ All proposed expenditures should be aligned with a Title IV-A program and identified as a need in the Consolidated Application.

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Example of Budget Labeling

SALARIES FOR PROFESSIONAL STAFF			
		Subtotal - Code 15	$60,862
Specific Position Title	Full-Time Equivalent	Annualized Rate of Pay	Project Salary
Elementary STEM Teacher (Well Rounded Ed. Op - STEM)	.59605 FTE	$80,342	$47,888
After School Safe & Civil Schools PLC (Safe & Healthy Students - Reducing Use of Exclusionary Discipline Practices)	10 teachers	5 meetings x $31/hr x 2 hrs	$3,100
STEM Coordinator Stipend (Well Rounded Ed. Op. - STEM)	1 Stipend	$3,274	$3,274
Technology Coaches-personalized learning (Effective Use of Technology)	10 teachers	15 hrs x $44/hr	$6,600

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Statutory Spending Requirements for Title IV, Part A Funds

➢ **Administrative Cost:** LEA may reserve no more than 2% for the direct administrative cost of carrying out the LEA's responsibility under Title IV-A.

➢ LEAs with an allocation of **$30,000 or more** are required to use:

  ➢ a minimum of 20% in WRE program activities;

  ➢ a minimum of 20% in SHS program activities;

  ➢ and a portion in EUT activities.

➢ **EUT Special Rule:** LEAs shall use not more than 15% of EUT funds for purchasing technology infrastructure. This rule applies regardless of the LEA's allocation size.

➢ **Services provided to participating non-public schools apply toward the LEA's total expenditures across content areas and the EUT special rule.**

➢ For budget amendments, LEAs should check that they are tracking expenditures across content areas and are maintaining the statutory spending requirements.

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Statutory Spending Requirements for Title IV, Part A Funds

Example of the application of the statutory spending requirements for an LEA with an allocation of $30,000 or more:

$50,000 allocation

LEA used:

➢ $20,000 in WRE; ✓

➢ $20,000 in SHS and ✓

➢ $10,000 in EUT; ✓

   ➢ LEA can use no more than $1,500 for technology infrastructure purchases.

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Carryover of Title IV, Part A Funds

➢ An LEA may carry over up to 100% from the previous school year's allocation.

➢ If an LEA does not meet the spending requirements in the initial year, that commitment must be met in the carryover year.

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Carryover of Title IV, Part A Funds

➤ An LEA must continue to meet the previous school year's statutory spending requirements when accessing carryover funds across content areas as planned for in the previous school year's approved application.

➤ For example, if the LEA's allocation was $30,000 or more, the LEA must ensure that funds are spent as follows:

  ➤ minimum of 20% in WRE program activities;

  ➤ minimum of 20% in SHS program activities; and

  ➤ a portion in EUT activities (no more than 15% infrastructure).

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Commonly Asked Questions

Can we pay for/purchase:

- ➢ School Resource Officers?

- ➢ field trips?

- ➢ supplies and materials?

- ➢ playground equipment, furniture, or picnic tables?

- ➢ musical instruments?

- ➢ certification tests and/coursework that is required for certification?

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The answers are not simple!

To determine if an activity is allowable, the LEA should evaluate each question as follows:

1. Were the proposed activities informed by LEA needs, stakeholder engagement, and prioritization of schools?

2. Is the proposed activity consistent with the purposes of at least one of the three content areas in the Title IV-A program (WRE, SHS, and EUT)?

3. Is the proposed activity an allowable cost?

   a) Specifically, the cost of an activity is allowable under the Title IV-A 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).

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The answers are not simple!

b) The proposed use of funds for the activity must **supplement, and not supplant**. Supplanting is presumed if any of the following is true, according to federal fiscal guidance (2 CFR Part 200, Appendix XI):

   i. A district uses federal funds to provide services that are required under other federal, state, or local laws.

   ii. A district uses federal funds to provide services that the district provided with non-federal funds in the prior year.

   iii. A district uses federal funds to provide services that the district would otherwise provide without federal funds.

Note: These presumptions may be overcome if the district can demonstrate that it would not have provided the services absent the availability of these federal funds. For example, new STEAM professional development (PD) had been provided with state grant funds for middle school teachers, and the grant funds were not available for the coming year. Title IV-A funds could be used for this PD, assuming no other presumption was violated, and the district would not otherwise have been able to provide the PD.

4. Is the activity one of the prohibited activities in ESEA Section 4001(b) or Section 8526, as amended by the ESSA?

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Commonly Asked Questions

➢ What are some examples of technology infrastructure?

Some examples of technology infrastructure are the purchase of devices, equipment, learning technology software and platforms, digital instructional resources, one-time information technology purchases, and software applications.

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Commonly Asked Questions

➢ What are some examples of Community-Based Organizations (CBOs)?

Some examples of CBOs are Boys and Girls Clubs, Boy Scouts and Girl Scouts, YMCA, YWCA, after-school services, Cornell Cooperative Extension, 4 H, the Grange, sports organizations (Little League, CYO basketball, Pop Warner football), fire departments, parent-teacher associations/organizations, public libraries, food pantries/banks, Meals on Wheels, Habitat for Humanity, rescue missions, LGBTQ youth-serving organizations, Red Cross, Ronald McDonald House, Salvation Army, and the United Way.

It is best practice to consult and collaborate with a CBO with programmatic expertise.

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Commonly Asked Questions

➢ What are some examples of Local Government Representatives commonly used by schools?

Some examples are members of a local law enforcement agency, school resource officers, local juvenile court staff, local child welfare agency staff, local public housing agency representatives, village/town/city council representatives, village/town clerks, public school board of education members, or other local elected officials.

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Thank you!

For additional information and resources, please visit our Title IV-A website at http://www.nysed.gov/essa/title-iv-part-student-support-and-academic-enrichment

If you have further questions, please contact conappta@nysed.gov

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