

Frequently Asked Questions

Statutory Requirements

In making the determination of the allowability of funds for program costs will depend on several factors, starting with whether all statutory requirements are met. Assuming that the activity is consistent with the purposes Section 4108, as applicable, the SEA 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) at 2 CFR Part 200, Subpart E. Specifically, the cost of an activity is allowable under Title IV-A if it is reasonable and necessary for performance of the grant and allocable to the grant. Also, because section 4110 of the ESEA prohibits supplanting, the funds must supplement, and not supplant, other non-Federal funds that would otherwise be used to pay for the allowable activity

General Information

Q. Can you explain supplement vs. supplant?

A. SCG program funds may be used only to supplement, and not supplant, non-federal funds that would otherwise be available for activities authorized under the SSAE program (Section 4110). This means that, in general, LEAs may not use SCG funds for activities around safe and healthy students if the cost of those activities would have otherwise been paid with state or local funds in the absence of the SCG funds.

The three Presumptions of Supplanting guiding questions are:

- 1) Are the expenditures or activities required by other Federal, State, or local laws?
- 2) Were the expenditures or activities funded in previous years by non-Federal funds?
- 3) Would the expenditures or activities happen in the absence of Federal funds?

*To provide the most flexibility to districts while still meeting the supplement vs supplant rule, we are providing the following guidance to districts. On the application when listing the program, activity, item, or position, you will be asked to identify the model of implementation: ***New Implementation or Growth and Expansion.***

Q. What is meant by Uniform Grants Guidance?

A. Uniform Grants Guidance cost principles apply to the use of SCG program funds, including the standards: • Necessary and reasonable • Allowable • Allocable to the program • Adequately documented

Q. Who is eligible to apply for this grant?

A. Any LEA may apply; however, this grant is for those with high needs. High need LEAs have been identified using the following three indicators: (1) high percentages of students living in poverty (40 percent or higher) and (2) high rates of chronic absenteeism, and (3) high rates of students who are disengaged. A chart with the identified high need LEAs can be found [here](#).

Q. What is the timeline for the grant?

A. Grant funds will be available to districts for the following school year (SY). SY23/24, SY24/25, and 25/26.

Allowable Use of Funds

Q. May funds be used to design and implement high-quality, comprehensive emergency operating plans and emergency drills?

A. Yes. It is recommended that schools take a comprehensive approach by implementing school-based violence prevention programs in coordination and alignment with broader evidence-based community violence prevention strategies.

Q. May funds be used to support safety and violence prevention programs?

A. Yes. The Department recommends that schools take a comprehensive approach by implementing school-based violence prevention programs in coordination and alignment with broader evidence-based community violence prevention strategies.

Q. Can we hire a School Resource Officer (SRO) with Title IV Part A Funds SCG Funds?

A. In making the determination of the allowability of funds for program costs will depend on several factors (as stated above), starting with whether all statutory requirements are met. The district must first and foremost demonstrate a need (i.e., School Threat Assessment or other needs assessment with relevant data, alignment within the schools Strategy Map) and how the SRO would meet that need.

The SRO must also follow an evidence-based approach. The National Association of School Resource Officers (NASRO) developed the triad model which is what we recommend. The SRO triad model outlines their responsibilities under three areas: teacher, informal counselor, and law enforcement officer. The SRO must fit into a **comprehensive system of supports** for staff and students and how that system is utilizing evidence-based programs.

Schools must also develop and have in place a relevant way to assess or evaluate the effectiveness of the SRO within the school environment as demonstrated through student outcome data. Allowability will be determined on a case-by-case basis.

****Evidence has shown if they are just a security presence, then it is detrimental to the school climate.***

Q. Can we purchase security cameras with SCG funds?

A. In making the determination of the allowability of funds for program costs will depend on several factors (as stated above), starting with whether all statutory requirements are met. The district must first and foremost demonstrate a need (i.e., School Threat Assessment or other needs assessment with relevant data, alignment with the school's strategy map) and how the purchase of security cameras would meet need. They must fit into a **comprehensive system of supports** for staff and students.

Schools must also develop and have in place a relevant way to assess or evaluate the effectiveness of the addition of the security system within the school environment and how is it tied to student outcomes. Allowability will be determined on a case-by-case basis.

The following should guide the LEA when making this determination:

- Are the activities/strategies found within the LEA’s Emergency Response Plan?
- Are the intended purchases necessary and reasonable?
- Are the three presumptions of supplanting met? (As listed previously)

** Construction is not authorized under Title IV-A. Thus, allowable activities regarding the condition of a school building must fall into the definition of “minor remodeling” to be considered 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.*

Equitable Services

Q. Must an LEA receiving SCG funds provide for the equitable participation of nonpublic school children and educators?

A. Yes. Each eligible LEA receiving a Stronger Connections Grant must, after timely and meaningful consultation with appropriate nonpublic school officials, provide eligible nonpublic school students and educators services and other benefits that are equitable in comparison to services and other benefits provided with Stronger Connections funds to public school students and educators. (ESEA section 8501(a)(1), (3)(A)). The LEA makes the final decisions with respect to the services it will provide to eligible nonpublic school students and educators (34 C.F.R. § 299.7(b)(3))

Q. When and with whom must an LEA consult regarding equitable services in developing its grant application?

A. LEA applying for a Stronger Connections grant must consult with appropriate nonpublic school officials before the entity makes any decision that affects the opportunities of eligible nonpublic school children and educators to participate (ESEA section 8501(c)(3)). Such consultation might include a brief survey of non-public schools or other information gathering to indicate the schools’ interest in participating and the population to be served. Such consultation will allow the LEA to consider the needs of all students and educators—both public and nonpublic—in developing its application, and to include the projected costs for equitable services in the application.

Q. If an LEA receives the grant, must they engage in ongoing consultation with their nonpublic schools?

A. Yes. The LEA must continue to consult with interested nonpublic school officials on the specific services the LEA will provide students and educators, consistent with the LEA’s approved application, including any limitations or priorities established by the SEA.

Q. Has the SEA established any priorities or limitations regarding the SCG funds?

A. Yes. If an LEA receives the SCG, the SEA has established the following priorities: (1) highly recommended completion of a School Threat Assessment if the district has not completed such an assessment within the last three years, funding available through a separate sub-grant, (2) completion of a culture climate survey (to be determined by district), (3) updated Strategy Map. This would also be a requirement for the nonpublic school if they wish to participate within the grant.

Q. How does an LEA determine the amount of funds to request for equitable services to nonpublic school students and educators in its grant application?

A. Section 8501(a)(4) of the ESEA requires an LEA to ensure that its expenditures for equitable services for eligible nonpublic school students and educators under covered ESEA programs are equal on a per-pupil basis to the expenditures for participating public school students and educators, taking into account the number and needs of the eligible nonpublic school students and educators. An LEA could choose to calculate equal expenditures strictly based on the relative enrollments of public and nonpublic schools in the LEA on the assumption that these numbers accurately reflect the relative needs of children and educators in public and nonpublic schools.

Stakeholder Engagement

Q. How should the LEA engage educators and other school staff in the grant application development and implementing the grant?

A. Funds may be used to support educator and school staff surveys, convenings, and other opportunities to hear directly from educators and other school staff. The Institute of Education Sciences' Regional Education Laboratories Program offers a series of resources educators can use to develop [high-quality surveys](#). Additional resources are available through the [Safer Schools and Best Practices Clearinghouse](#).

Q. How should the LEA engage students, parents, families, and the community in the subgrant application development and implementing the grant?

A. LEA leaders can better elicit and understand parent and caregiver priorities and concerns by holding town halls (in-person and virtually); using high-quality school climate surveys; conducting community needs and asset mapping; and bringing schools to families by hiring a parent outreach coordinator, supporting home visits, and having school representatives provide resources and training.