TITLE IV, PART A: STUDENT SUPPORT AND ACADEMIC ENRICHMENT

The purpose of Title IV, Part A is to improve students' academic achievement by increasing the capacity of local educational agencies (LEAs, also referred to as school districts) to:

- Provide all students with access to a well-rounded education. *Section 4107*
- Improve school conditions for student learning. *Section 4108*
- Improve the use of technology in order to improve the academic achievement and digital literacy of all students. *Section 4109*

Determining how to use Title IV-A funds to support your district's outlined goals is both an art and a science due to the flexibilities of this funding stream. The information sheet, *Braiding Funds to Enhance Title IV-A Program Efficiency and Outcomes*, outlines strategies to help maximize the impact of funds and improve student outcomes.

Well-Rounded
The purpose of a well-rounded education is to provide an **enriched curriculum and equity of access to all students.** A well-rounded education promotes a diverse set of learning experiences that engages students across a variety of courses, activities, and programs that make time for exploration and help students make important connections among their studies, their curiosities, their passions, and the skills they need to become critical thinkers and productive members of society. For example:

- Science, technology, engineering, and mathematics (STEM)
- Arts–music, dance, media arts, theater, and visual arts
- Foreign language instruction
- Health and physical education
- Civics instruction
- Environmental education
- Social-emotional learning

- College and career counseling
- Accelerated learning programs–dual or concurrent enrollment and early college high school programs
- Project-based learning
- Out-of-school time opportunities–before/during school and during breaks
- Programs and activities that promote volunteerism and community involvement

Safe and Healthy Students
The second purpose under Title IV, Part A is to **improve school conditions for student learning**. When students are healthy and feel safe and supported, they are more likely to succeed in school. Generally, funds may be used for any program or activity that fosters safe, healthy, supportive, and drug-free school environments, including direct student services and professional development and training for school staff. Activities under this section are grouped under two general topics: 1) Safe and supportive learning environments and 2) Student physical and mental health. Program examples include:

Safe and Supportive Learning Environments
- Trauma-Informed Classrooms/Schools
- MTSS/PBIS
- Dropout Prevention
- Suicide Prevention
- Preventing Bullying and Harassment
- Reducing Use of Exclusionary Discipline Practices & Promoting Supportive School Discipline Student

Physical and Mental Health
- School-Based Mental Health Services
- Health Services, including Chronic Disease Management
- Drug and Violence Prevention
- Healthy, Active Lifestyle, Nutritional Education
- Preventing Use of Alcohol, Tobacco, Smokeless Tobacco, Electronic Cigarette

Effective Use of Technology

The third purpose under Title IV, Part A is to increase the effective use of technology to help improve the academic achievement, academic growth, and digital literacy of all students. When carefully designed and thoughtfully applied, technology can accelerate, amplify, and expand the impact of effective practices that support student learning, increase community engagement, foster safe and healthy environments, and enable well-rounded educational opportunities. For technology to be truly transformative, educators need to have the knowledge and skills to take full advantage of technology-rich learning environments. Examples of activities include:

- Developing and implementing blended learning strategies
- Discovering, adapting, and sharing openly licensed high-quality resources
- Delivering courses through technology
- Collaboration enabled by technology
- Supporting professional learning for STEM, including computer science

Note - The intention for this category of funding is to improve the effective use of technology, as opposed to simply purchasing technology; therefore, this area includes a special rule. No more than 15 percent of funds for activities in the effective use of technology may be used for purchasing "technology infrastructure," which includes devices, equipment, software applications, platforms, and other one-time IT purchases.
Program purpose descriptions adapted from US Department of Education Non-Regulatory Guidance for Title IV, Part A.

Stakeholder Consultation

Districts must engage in meaningful consultation with stakeholders throughout the program development and implementation process. Stakeholders must include, but are not limited to, the following (as applicable):

- Parents/families
- Teachers
- Principals
- Students
- School leaders

- Specialized instructional support personnel
- Indian tribes or tribal organizations
- Local government representatives
- Community-based organizations
- Others with relevant and demonstrated expertise

The district should continue to engage stakeholders to improve the effectiveness of activities to coordinate implementation with other related strategies, programs, and activities being conducted in the community.

Comprehensive Needs Assessment (CNA)

The district must complete and/or update the CNA at least once every three years. NDDPI has not prescribed a comprehensive needs assessment tool that districts must use. However, the US Department of Education has developed a *needs assessment tool* that may be used by districts if they wish.

If existing needs assessment processes do not address the three content areas included in Title IV, Part A, then a separate comprehensive needs assessment should be conducted to ensure relevant needs are identified for use of funds.

Using their needs assessment, each district establishes how it will prioritize the distribution of its Title IV, Part A allocation using the following five ways in accordance with ESEA section 4106(e)(2)(A) and may use multiple allocation methods.

- Have the greatest needs determined by the district;
- Have the highest percentage or numbers of low-income children;
- Are identified for comprehensive support and improvement under Title I;
- Are implementing targeted support and improvement plans under Title I; or
- Are identified as a persistently dangerous school under Section 8532.

Equitable Services

Federal law requires districts receiving Title IV, Part A funds to provide for the equitable participation of nonpublic school students, teachers, and other educational personnel in nonpublic schools located in the district, including by engaging in timely and meaningful consultation with nonpublic school officials during the design and development of their Title IV, Part A programs. More information about equitable services in federal programs can be found *here*.

Equitable Services Requirements:

- Conduct timely and meaningful consultation
- Consult and provide services to implement the provision of equitable services
- Involve the participation of parents and families of students attending participating nonpublic schools in the planning and development of services
- Maintain fiscal control of ESEA funds and property
- Determine eligibility and collect data to comply with provisions of equitable services

- Set aside funds for participating nonpublic schools
- Determine the proportionate share of funds used to provide equitable services (under Title I based on the entire Title I allocation before taking any other set-aside off the top)
- Engage in timely, meaningful consultation with nonpublic schools **BEFORE** transferring funds out of any eligible ESEA program (Title II and Title IV)

Spending Obligations (claims must be made every 120 days)

Districts that receive an allocation of at least $30,000 or more must expend funds in all three content areas as follows:

- use at least 20% of Title IV funds on activities to support well-rounded education,
- use at least 20% of Title IV funds on activities to support safe and healthy students,
- a portion of funds on activities to support the effective use of technology. Based on the total of the EUT budget, no more than 15% can be used on technology infrastructure.

Districts that receive an allocation of less than $30,000 are not required to expend funds in the three content areas. However, based on the total of the EUT budget, no more than 15% can be used on technology infrastructure. *Technology infrastructure includes devices, equipment, software applications, platforms, digital instructional resources and/or other one-time information technology purchases.*

Objectives and Outcomes

Title IV requires the application narrative to contain objectives and outcomes, description of activity and evaluation method. The objectives/outcomes are meant to be broad and overarching. On the budget portion you will break down and be more specific with your justification for the desired activities. The activities should align with the broad objectives/outcomes in the narrative section of the application.

Transferability

A district may transfer funds from Title IV into other eligible Federal Title programs after 1) conducting a needs assessment and 2) engaging in timely, meaningful consultation with stakeholders and nonpublic schools (if applicable).

Monitoring

The NDDPI is required by federal law to monitor local Title I, Title II, Title III, Title IV, Private School Equitable Services, English Learners, Homeless, and Foster Care programs to ensure compliance with programmatic and fiscal regulations. Please check our *Federal Title Monitoring* page for a list of districts who will be monitored and the monitoring requirements.

Self-Monitoring

Although not required, districts are encouraged to engage in Self-monitoring of their Title IV program. A Self-Monitoring checklist has been created and is available in the Title IV Coordinator Toolkit.

Supplement vs. Supplant
ESEA prohibits supplanting. Title IV funds must supplement, and not supplant, other non-Federal funds that would otherwise be used to pay for the allowable activity. In no event may districts decrease the amount of state or local funds used to pay the cost of an activity simply because of the availability of the Title IV-A program funds.

Allowability
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 of one of the three content areas, 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. Allowability will be determined on a case-by-case basis and may require further consultation with the districts. Please reference the ***Frequently Asked Questions*** document.

Non-Allowable Activities
ESEA funds may not be used: 1) 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; 2) to provide sex education or HIV-prevention education in schools unless that instruction is age appropriate and includes the health benefits of abstinence; 3) to operate a program of contraception distribution in schools 4) may not 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; or 5) purchase of or training in the use of a dangerous weapon.

Reporting Requirements
In accordance with the Elementary and Secondary Education Act (ESEA) ***§4104(a)(2),*** NDDPI is required to collect and **publicly report** how funds made available under Title IV are being expended by districts. The data must be collected and reported by Federal Fiscal Year and include content area, the objectives and outcomes described in their **consolidated application** ESEA ***§4106(e)(1)(E)*** and the degree to which the districts have made progress towards meeting their objectives and outcomes.

Public Reporting Requirements: Compliance for federal program reporting requirements for Federal Fiscal Year (FFY) will be collected and reported in the following manner:

1) Progress Report- FFY (due by the end of the grant cycle- typically 27 months)
Districts who retain their Title IV funds in Title IV or Transfer Funds to Title IV will be assigned a status report in Webgrants. The report titled *Progress Report* will be due when all funds in that Federal Fiscal Year are expended, which means it will be due at different times for each district. All reported information within the *Progress Report* will be published on the Title IV webpage. Failure to submit this report will result in non-compliance and will trigger further action from NDDPI.

2) Title IV Expenditure Report by Content Area- FFY (must report annually)
NDDPI will publicly report aggregate statewide use of funds expenditures by the three content areas: Well-Rounded, Safe & Healthy, and Effective Use of Technology. This data is extracted from the paid expenditures in your Title IV claim.

Title IV Coordinator Toolkit
The ***Toolkit*** contains information, examples, and resources for your district to support the development, implementation, and evaluation of your district's investment in Title IV-A Program Student Support & Academic Enrichment funds.