

Prior to Budgeting Title IV Funds

Prior to budgeting federal funds, districts must first evaluate the needs of their students and educators. For a district receiving a current year Title IV allocation of \$30,000 or more, this includes aligning Title IVA activities to the results indicated in the required comprehensive needs assessment.

Title IV also requires districts to consult with identified stakeholders (listed in the consolidated application). After conducting and reviewing a needs assessment and stakeholder consultation, the district determines its priorities and creates a strategic plan. Funding streams are then reviewed to determine how to braid and blend funds to fund their plan.

Needs Assessment

**Districts over \$30,000 must complete a comprehensive needs assessment every three yrs.*

- **District developed and implemented a process for determining the needs of their students and it includes the three areas of Title IVA.**

Consultation

**Districts who have an eligible, participating non-public must engage in meaningful and ongoing consultation.*

- **District consulted with the required stakeholders with the purpose to review data and revise plans as needed.**

District Priorities

**Consultation must occur before the district may transfer their Title IVA Funds.*

- **District has identified priorities they will fund. Funding streams were reviewed to determine how best to braid and blend funds for the best possible outcomes. See *Funding Your Plan* for further guidance.**

Objective and Outcomes

**Districts should use evidenced-based activities when possible.*

- **Based on the identified needs and priorities, district created objectives and outcomes to meet the purpose of the Title IV program. Each objective must have a way to measure effectiveness.**

Based on the priorities for Title IVA funds, districts should determine how to supplement (i.e., create, expand) current educational programming, activities, and/or training related to the three content areas: well-rounded educational opportunities, safe and healthy students/school climates, and effective use of technology.

Districts then engage in creating objectives and desired outcomes and determine what is required to meet the intended outcomes. After deciding how to supplement current offerings, the district's next consideration should be what is required to meet the intended outcomes (e.g., additional staffing, supplies).

Finally, districts should ensure that the proposed activity meets the requirements of the Determining Allowability of Proposed Title IVA Activities section below.

Resources

[Title IV-A Implementation Planning Tool](#)

[Title IV-A LEA Needs Assessment Tool](#)

[Title IV-A Evaluation Tool](#)

[Affirmation of Consultation \(nd.gov\)](#)

[Developing Stakeholder Relationships to Support School Programming](#)

[Funding Your Plan](#)

[Braiding Funds to Enhance Title IV-A Program Efficiency and Outcomes](#)

[Developing Stakeholder Relationships to Support School Programming](#)

[Selecting Evidence-Based Programs and Practices for Title IV, Part A Activities](#)

[Developing Objectives and Measurable Outcomes](#)

Determining Allowability of Proposed Title IVA Activities

In determining whether an activity, program, or training is allowable under Title IVA, districts should use the following information as a guide.

Is the activity one of the following prohibited activities?

- a. “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” (ESEA § 4001(b)).
- b. Religious worship or instruction or any educational service, including equipment and materials, that is not secular, neutral, and non-ideological (ESEA §§ 8501(a)(2) & 8505).
- c. Construction, renovation, or repair of any school facility (ESEA § 8526(1)).
- d. Transportation associated with getting students to and from school (ESEA § 8526(2)).
- e. Development or distribution of materials, or operation of programs or instructional courses directed at youth, that are designed to promote or encourage sexual activity (ESEA § 8526(3)).
- f. Distribution of legally obscene materials to minors on school grounds (ESEA § 8526(4)).
- g. Provision of sex education or HIV-prevention education in schools unless that instruction is age-appropriate and includes the health benefits of abstinence (ESEA § 8526(5)).
- h. Operation of a program of contraceptive distribution in schools (ESEA § 8526(6)).
- i. Purchase of a dangerous weapon or providing training on how to use a dangerous weapon.

If the proposed activity is listed as prohibited, it is not allowable. The district may wish to consider other funds streams that do not have this requirement.

Is the proposed expenditure consistent with the purpose of at least one of the three program areas of the Title IVA program?

- a. The purpose of the Title IV program is to **improve students’ academic achievement** by increasing the capacity of the district to improve:
 - Access to and opportunities for a well-rounded education for all students;
 - School conditions for student learning to create a healthy and safe school environment (safe and healthy students); and
 - Access to personalized learning experiences supported by technology and professional development for the effective use of technology and data.

If the proposed activity does not align with the Title IVA program areas, it is not allowable. The district may wish to consider other funds streams that do not have this requirement.

Is the proposed expenditure consistent with the intent and purpose of Title IVA?

- a. The intent of the Title IVA program is not to buy items but, instead, to create and/or provide supplemental educational programs, activities, and training to improve students’ academic achievement in the three content areas.
- b. Supplies are only allowable if they can be tied directly to the implementation of the proposed program. In other words, supplies are allowable if the proposed program could not be offered without the supplies.

A budget line item labeled “supplies” does not provide enough information to determine eligibility. If approved as such, the district runs the risk of purchasing supplies that upon review of receipts and ledgers, are not approvable. Therefore, the district would then absorb the cost of the non-allowable supplies.

Are the costs allowable under the Uniform Guidance (2 CFR Part 200, Subpart E)?

- a. Is the cost reasonable and necessary for the performance of the grant?
 - Did my needs assessment indicate this as a need?
 - Do I really need this?
 - Is the expense necessary to carry out the grant?
 - Is this the minimum amount I need to spend to meet my need?
 - Do I have the capacity to use what I am purchasing?
 - If I were asked to defend this purchase, would I be able to?
 - Did I pay a fair rate?
- b. Is it chargeable to the grant award in proportion to the benefits received by the grant award as a result of the cost?
 - A cost is allocable to a federal award or cost objective if the goods or services involved are chargeable or assignable in accordance with relative benefits received.
 - A district can only charge in proportion to the value received by the program.

If an activity is not necessary, reasonable, allowable, allocable to the program, and adequately documented. It is not allowable. The district may wish to consider other funds streams that do not have this requirement.

Does the proposed use of funds for the activity supplement what is currently offered?

Title IVA funds may be used only to **supplement**, and not supplant, non-federal funds that would otherwise be available for activities authorized under Title IV (Section 4110). This means that, in general, districts may not use Title IV funds for the cost of activities in the three program areas – well-rounded education, safe and healthy students, and technology – if the cost of those activities would have otherwise been paid with state or local funds in the absence of the Title IV 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?

If the answer is yes to any of these questions, supplanting is presumed and using Title IVA funds for the activity is not allowable.

Note: Technology infrastructure is defined as devices, equipment, software applications, blended learning software and platforms, digital instructional resources (e.g., textbook substitutes, digital licenses, online subscriptions), initial professional development activities, other one-time information technology purchases (ESEA § 4109(a)(2)(B) & (a)(4)(A)). This is limited to 15% of the total funds spent in the Effective Use of Technology area.