



# NORTH DAKOTA DEPARTMENT OF **PUBLIC INSTRUCTION**

## ***Title IV – Part A District Coordinator Toolkit***

Kirsten Baesler  
State Superintendent  
Department of Public Instruction  
600 East Boulevard Avenue Dept. 201  
Bismarck, ND 58505-0440  
[www.nd.gov/dpi](http://www.nd.gov/dpi)

**The following information, examples, and resources are provided 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.**

**Items noted with an Asterisk \* will be monitored for identified districts.**

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The following information, examples, and resources are provided for your district to support the implementation and evaluation of the investment of your [Title IV Part A Funds](#).

## Purpose ([ESEA section 410](#))

Every Student Succeeds Act (ESSA), which reauthorized the Elementary and Secondary Education Act of 1965 (ESEA), was signed into law in December 2015. Newly authorized under ESSA is the Student Support and Academic Enrichment (SSAE) program.

Title IV Part A (Title IV-A) grant funds are supplemental in nature with the intended outcome to improve students' academic achievement by increasing the capacity of State, districts, 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 to improve the academic achievement and digital literacy of all students.

District Title IV-A Coordinators should become familiar with the following documents:

- [Title IV, Part A Statute](#)
- [Title IV, Part A Non-Regulatory Guidance](#)
- [Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments](#)
- [Education Department General Administrative Regulations \(EDGAR\)](#)

## Funding Your Strategic Plan

The NDDPI collaborates with Cognia to assist schools in the creation of a Continuous School Improvement plan. This plan is meant to be rooted in a school's current reality based on data assessment and "futures thinking". "Futures thinking" enables schools to think about future trends like technology and policy changes, as well as innovative education practices.

Ultimately, the Continuous Improvement process results in the creation of a Strategy Map. A Strategy Map is a succinct, one-page document that explains a school's education priorities. As an accountability measure of School Improvement for all under ESSA, every public school in North Dakota will participate in the Continuous School Improvement process through Cognia and create a Strategy Map. It is important to note all schools will go through this process, and plans must be updated annually.

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.

## Allowability

As the Title IV-A program grows so does our understanding and application surrounding allowable use of funds. In making the determination of the allowability of funds for Title IV-A program costs depends 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,

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 Grant Guidance) at 2 CFR Part 200, Subpart E. Uniform Grants Guidance cost principles apply to the use Title IV program funds, including the standards below:

- Necessary and reasonable
- Allowable
- Allocable to the program
- Adequately documented

### \*Annual Program Evaluation (*ESEA section 4106*)

The evaluation plan or detailed process of how the district conducted an annual evaluation of the activities/programs/positions funded by Title IV. The evaluation results inform programming for the upcoming school year and is required.

#### **Guiding Questions**

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Does the district have an evaluation plan or detailed process for annually reviewing activities/programs or positions funded by Title IV? (Some districts have timelines and have aligned data points for review.)

How do we document this? Is it aligned with or embedded in the process of developing our Strategy Map?

Documentation and data are key!

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### \*Alignment of Funds and Program Activities (*ESEA section 4106(d)*)

The district is required to engage in the below activities and have documentation addressing each of the following requirements.

The district's work with Cognia and their resulting Strategy Map should align with the areas below and can be part of the information submitted during monitoring. Districts who are identified as comprehensive or targeted must also have additional plans they must identify.

#### \*1) Prioritizing Funding (*ESEA section 4106(e)(2)(A)*)

*Each LEA establishes how it will prioritize the distribution of its Title IV, Part A allocation in five ways in accordance with ESEA section 4106(e)(2)(A) and may use multiple allocation methods. The district must use information from the needs assessment or other means if the district is not required to conduct a needs assessment to determine the best way to allocate funds to target the identified need(s).*

*Allocation methods:*

- Provide funding to schools with the greatest needs.
- Target schools with the highest percentages or numbers of low-income students.
- Comprehensive Student Support and Improvement status (CSI schools).
- Targeted Support and Improvement status (TSI schools).
- Are identified as a persistently dangerous school.

**\*2) Identified goals and outcomes aligned with Title IV-A activities. ([ESEA section 4106\(e\) \(1\)](#))**

Schools must develop and have in place a relevant way to assess the effectiveness for any program or activity using Title IV funds. LEAs can determine if they wish to establish objectives and outcomes for each activity, for a group of activities, or for the application. We recommend that the development of objectives and outcomes be driven by the identified needs and the plan outlined in the LEA consolidated application and supported in the work with Cognia and aligned with their Strategy Map.

**\*3) Assuring the supplement vs. supplant requirement. ([ESEA section 4110](#))**

How the district prioritized needs and the distribution of funds for identified evidence-based programs and/or activities following Title IV-A requirements must be supplement in nature and meet the intent of the program. 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. In no event may LEAs 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.

***Guiding Questions***

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How did the district determine their needs? How is it documented? What data was used, and did it cover all three Title IV-A areas?

How did the district prioritize funding? How did we document this?

How did the district identify their goals and outcomes aligned with Title IV-A activities? What data was used, and did it cover all three Title IV-A areas?

How are our goals and outcomes going to be monitored for effectiveness?

Is the activity/program required by state law? If so, it would be supplanting to use federal funds.

Is this an activity/program/position?

If it is new activity/program/position, are there no state or local funds to pay for the activity/program/position?

Do you have documentation to support that the activity/program/position will be discontinued due to lack of funds?

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## \*District Internet Safety Policy ([ESEA section 4121](#))

Title IV-A requires that district's internet safety policy with respect to all devices with internet capability that protects against access to visual depictions that are obscene and harmful to minors and is enforcing the operation of this policy. (ESEA 4121). Districts will need to provide their policy for review when being monitored.

## \*Funding Requirements ([ESEA section 4106 \(a\)\(2\)\(C\)\(D\)\(E\)](#))

- Not less than 20 percent of funds to support one or more of the activities authorized under section 4107 pertaining to well-rounded educational opportunities,
- Not less than 20 percent of funds to support one or more activities authorized under section 4108 pertaining to safe and healthy students, and
- A portion (defined as an amount identified as enough to carry out a program or activity identified as a priority for the LEA) of funds to support one or more activities authorized under section 4109(a) pertaining to the effective use of technology. No more than 15 percent of the EUT portion may be used for purchasing technology infrastructure as described in section 4109(b) (ESEA section 4106(e)(2)(C)-(E)).

## \*Informed Consent ([ESEA section 4001](#))

Title IV-A funds that are used for any mental health assessment or service requires prior written consent. The LEA must obtain written consent from the parent of each child who is under 18 years of age before the administration and participation in any mental health assessment or service.

The informed consent must include a detailed description of the mental health assessment or service including the purpose of the assessment or service, the provider of the assessment or service, when the assessment or service will begin, and how long the assessment or service will last (ESEA section 4001). If applicable and funds were spent in this area, when an LEA is monitored, they must provide a template from each provider used.

## \*Comprehensive Needs Assessment ([ESEA section 4106\(d\)](#))

How the district's needs were determined and how the Title IV-A activities were aligned with district needs (ESEA section 4106(d)) is a requirement of Title IV-A SSAE Funds. Collecting and analyzing outcome data during a needs assessment help LEAs identify where their schools are facing challenges and stay focused on those outcomes as they implement their Title IV-A program. When being monitored, evidence of a current (within the last three years) comprehensive needs assessment must be provided.

The district must conduct needs assessment within the **last three years** (ESSA 4106(e) (2)(A)). The needs assessment is required to be comprehensive and identified and examined areas for improvement related to:

- Access to, and opportunities for, a well-rounded education (4107) for all students
- School conditions for student learning to create a healthy and safe school environment (4018)
- Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology (4019)

The Title IV-A LEA **Comprehensive Needs Assessment Tool** is designed to help LEAs meet the Title IV-A needs assessment requirements, while also being structured to encourage LEAs to think first about the desired outcomes, then work backwards to identify the programs that will best serve those outcomes. Districts may have their own needs assessment tool or process and are not required to use the provided tool.

- Needs Assessment Guidebook
- Need Assessment Tool for download and district use

- Webinar about how to use the Need Assessment Tool
- View the Need Assessment Tool webinar slides

Districts must engage in timely and meaningful consultation with a broad range of stakeholders and should examine relevant data to understand students' and schools' most pressing needs, including the potential root causes of such needs.

### ***Guiding Questions***

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How did the district determine their needs?

How is it documented?

What data was used, and did it cover all three Title IV-A areas?

Is the needs assessment current (with in a three-year time frame)?

Does our needs assessment support using our Title IV funds in Title IV, or should we consider transferring them to support other areas of documented need?

Do our needs align with our strategy map?

Do we have any data in Cognia that supports our needs?

Documentation and data are key!

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## **Collecting and Analyzing Data**

Districts complete a strategy map that is authentic to their needs and outlines their yearly priorities and objectives. The school dashboard [Insights](#) provides an opportunity for schools to showcase and highlight strengths in their building while providing transparency to the public.

Using the search engine, you can explore your school system. The arrow on the right side provides options for you to filter your search. Strategy Maps are located under each individual school. On the right side, select School Improvement, and you will be able to view the objectives for each district.

**The data reviewed and used to inform the investment of Title IV-A funds should include all the three required areas. Possible data sources may include but are not limited to:**

- Choice Ready Data
- Youth Risk Behavior Survey
- Suspension, Expulsion, and Truancy Data
- School Counselor ratio, caseload numbers, duties within their scope of practice (i.e.-time spent in career planning)
- School Office/Discipline Referrals/Crisis referrals
- Absenteeism Rates
- Graduation Rates, Dropout Rates
- Student Climate Surveys, Cognia Surveys, PBIS surveys
- Enrichment Course Offerings and percentage of students taking them

- CTE Courses/Coordinated Plans Data
- Safety Audit
- Technology Surveys

### ***Guiding Questions***

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How did the district determine their needs?

What stakeholders were engaged in the process?

How is it documented?

What data was used, and did it cover all three Title IV-A areas?

Is the needs assessment current (with in a three-year time frame)?

Does our needs assessment support using our Title IV-A funds in Title IV-A, or should we consider transferring them to support other areas of documented need?

Do our needs align with our strategy map?

Do we have any data in Cognia that supports our needs?

Documentation and data are key!

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# Resources

[Aligning Evidence-Based Clearinghouse with ESSA Tiers of Evidence](#)

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

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

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

[Title IV- A Evaluation Tool](#)

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

[Effective Use of Technology Resource Guide for Local Education Agencies](#)

[Preventing School Dropout Brief Resource Guide](#)

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

[Key Approaches for Strengthening School Mental Health: A Primer & Resource Guide](#)

[Addressing School Mental Health](#)

[High Quality Emergency Plans for Schools](#)

[Paving the Way for Sustainable School Mental Health Programs with Participatory Planning](#)

[Mental Health Screening Tools for Grades K–12 \(ed.gov\)](#)

[What do school staff and community stakeholders need to know about school mental health?](#)

[Early Action Planning for Sustainability of School-Based Mental Health Programs](#)

[Quick Reference Guide: Strategies to Sustain and Expand School Mental Health Services at the Local/Community Level](#)

[Implementing School Mental Health Supports: Best Practices in Action \(ed.gov\)](#)

[Safe Schools FIT Toolkit | The National Center for Healthy Safe Children](#)

[Conducting a Needs Assessment and Environmental Scan for a Safe Schools/Healthy Students Initiative in Your School](#)

[EBP Modules Checklists Mod 1.pdf \(healthysafechildren.org\)](#)

## Use of Funds

### *Well-Rounded Education* ([ESEA section 4107](#))

The purpose of a well-rounded education is to provide an enriched curriculum and education experience to all students. Programs and activities supported in this section must be supplemental and may include:

- STEM
- The opportunity to earn credits from institutions of higher learning
- Reimbursing low-income students to cover the costs of accelerated learning examination fees
- Environmental education
- Programs and activities that promote volunteerism and community involvement
- Music and arts programs
- College and career counseling
- Social Emotional Learning (SEL)

### *Safe and Healthy Students* ([ESEA section 4108](#))

The purpose of this section is to improve school conditions for student learning. 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. Supplemental programs and activities in this section may include:

- Bullying and harassment prevention
- School dropout prevention
- Re-entry programs and transition services for justice involved youth
- Suicide prevention
- Drug and violence prevention
- School-based health and mental health services
- Healthy, active lifestyle, nutritional education
- Trauma informed classroom management
- Chronic disease management
- Physical activities
- Building school and community relationships

### *Effective Use of Technology* ([ESEA section 4109](#))

Programs and activities in this section of the grant must be used for increasing the effective use of technology to improve the academic achievement, academic growth, and digital literacy of all students. There is a special rule that states that no more than 15% of funds in this content area may be spent on technology infrastructure, which is defined as devices, equipment, software application, platforms, digital instructional resources, and or/other one-time IT purchases. Supplemental ways funds may be used in this section:

- Building technological capacity and infrastructure
- Developing or using effective or innovative strategies for the delivery of specialized or rigorous academic courses using technology
- Carrying out blended learning activities
- Providing professional development on the use of technology to enable teachers to increase student achievement in STEAM areas
- Providing students in rural, remote, and underserved areas with the resources to take advantage of high-quality digital learning experiences
- Providing educators, school leaders, and administrators with the professional learning tools, devices, content, and resources to personalize learning; discover, adapt, and share relevant high-quality educational resources; use technology effectively in the classroom
- Implement and support school and district-wide approaches for using technology to inform Instruction, support teacher collaboration, and personalize learning

***Federal funds cannot be spent on the following:***

- Construction, renovation, or repair of any school facility.
- Medical services for 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.

Note: 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 allowable. See 34 CFR 77.1(b).

Please review the [Title IV FAQ Document](#).

## Title IV Self-Monitoring Checklist

The following has been created as a quick self-monitoring checklist to help districts determine where they are at with meeting the Title IV monitoring requirements.

**All districts must complete SSAE01–SSAE04**

**Districts over \$30,000 must also complete SSAE05–SSAE046**

### SSAE01 Annual Evaluation

\_\_\_\_\_ **Yes.** \_\_\_\_\_ **No.** *The district has documentation of an evaluation plan or detailed process of how they conducted an annual evaluation of the Title IV program/activities to plan for the upcoming school year.*

### SSAE02 Alignment of Funds and Program Activities

\_\_\_\_\_ **Yes.** \_\_\_\_\_ **No.** *The district can provide a narrative and supporting documentation addressing each of the following requirements: (#3 will be collected through a Title IV Status Report which will be provided for you.)*

1. *How the district's needs were determined and how the Title IV-A activities were aligned with district needs (ESEA section 4106(d)).*
2. *How funding was prioritized based on the required criteria to distribute funds to schools based on one or more of the following criteria (ESEA4106):*
  - *Are among those with the greatest needs*
  - *Have the highest numbers of students served in Title I*
  - *Are identified for comprehensive or targeted support and improvement*
  - *Are identified as a persistently dangerous school*
3. *How the district identified goals and outcomes aligned with Title IV-A activities (listed below) and how goals and outcomes are monitored for effectiveness. (ESEA section 4106(e)(1):*
  - *Well-rounded education for all students,*
  - *Safe and healthy school environments,*
  - *Effective use of technology.*
4. *How the district prioritized needs and the distribution of funds for identified evidence-based programs and or activities following Title IV requirements assuring the supplement vs supplant requirement. (ESEA section 4108(5)(A), (B)(aa), (F)(ii)).*

### SSAE03 District Internet Safety Policy

\_\_\_\_\_ **Yes.** \_\_\_\_\_ **No.** *The district has adopted and can provide their internet safety policy with respect to all devices with internet capability that protects against access to visual depictions that are obscene and harmful to minors and is enforcing the operation of this policy. (ESEA 4121).*

### SSAE04 Informed Consent

\_\_\_\_\_ **NA.** *Not applicable, as Title IV funds were not use for any mental health assessment or service.*

\_\_\_\_\_ **Yes.** \_\_\_\_\_ **No.** *The district can submit a template(s) for prior written consent that the LEA or contracted provider has obtained from the parent of each child who is under 18 years of age and before the administration and participation in any mental health assessment or service. The informed consent must include a detailed description of the mental health assessment or service including the purpose of the assessment or service, the preorder of the assessment or service, when the assessment or service will begin, and how long the assessment or service will last (ESEA section 4001)*

## SSAE05 Needs Assessment (for districts with a Title IV allocation of \$30,000 or more)

\_\_\_\_\_ **Yes.** \_\_\_\_\_ **No.** *The district can submit\*evidence of a comprehensive needs assessment. The evidence or documentation includes the following information:*

*The district conducted a needs assessment within the last three years (ESSA 4106(e) (2)(A)). The needs assessment was comprehensive and identified and examined areas for improvement related to:*

- a. Access to, and opportunities for, a well-rounded education (4107) for all students*
- b. School conditions for student learning to create a healthy and safe school environment (4018)*
- c. Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology (4019)*

### **\*Evidence of a Comprehensive Needs Assessment**

- i. [US Dept of Education Title IV-A Needs Assessment Tool](#)
- ii. Evidence of a locally determined Needs Assessment Tool or Process
- iii. Other supporting documents for comprehensive needs assessment process: Meeting agenda/minutes, supporting data or evidence, parent survey, etc.

## SSAE06 Needs Assessment and Funding Requirements (for districts with a Title IV allocation of \$30,000 or more)

\_\_\_\_\_ **Yes.** \_\_\_\_\_ **No.** *The district must submit evidence of meeting Title IV spending requirements:*

- a. Not less than 20 percent of funds to support one or more of the activities authorized under section 4107 pertaining to well-rounded educational opportunities.*
- b. Not less than 20 percent of funds to support one or more activities authorized under section 4108 pertaining to safe and healthy students: and*
- c. A portion of funds to support one or more activities authorized under section 4109(a) pertaining to the effective use of technology, including an assurance that it will not use more than 15 percent of the remaining portion for purchasing technology infrastructure as described in section 4109(b) (ESEA section 4106(e)(2)(C)-(E)).*