

Title IV-A: Student Support and Academic Enrichment Grant CRP Rollout

March 9, 2022



RIDE Rhode Island
Department
of Education



This clinic will provide you with the information you need to:

- complete the 2022-2023 Title IV-A application;
- implement the equitable services requirements;
- complete required data reporting for the 2021-2022 CRP; and
- determine the allowability of an activity.



Agenda

Intent of Title IV-A

CRP Application

Equitable Services

Budget Information

Title IV-A Data Reporting

Questions and Answers

Intent of Title IV-A

The purpose of Student Support and Academic Enrichment Grant (Title IV-A) is to improve students' academic achievement by **increasing the capacity** of States, local education agencies (LEAs), schools and local communities to provide all students with:

- access to a well-rounded education;
- improve student conditions for student learning; and
- improve use of technology

in order to improve the academic and digital literacy of all students.

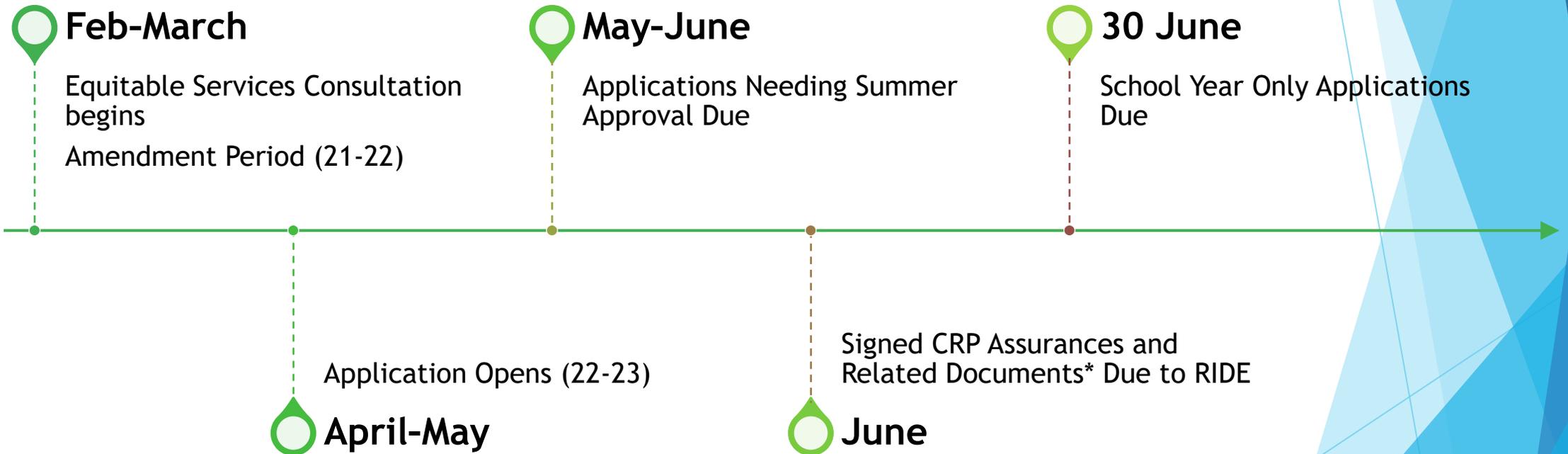
ESEA Section 4101

3 Areas of Focus

Well-Rounded Education	Safe and Healthy Students	Effective Use of Technology
<ul style="list-style-type: none">• Arts Education,• Civics and Government,• Foreign Language,• STEM/ STEAM Programs,• Social and Emotional Learning,• Advanced Learning,• AP Courses and• Environmental Education	<ul style="list-style-type: none">• School Guidance Counselors,• Restorative Justice,• Parent and Family Engagement,• Conscious Discipline,• PBIS,• Drop Out Prevention,• Physical Education and• Wellness	<p>Supports activities related to staff development in:</p> <ul style="list-style-type: none">• STEM subjects,• blended and remote learning programs and• PD around the use of student data to differentiate instruction.

Visit the T4PA TA Center’s website and [Searchable Title IV-A Statute](#) to learn about more potentially allowable activities.

CRP Timeline



*Documents will be uploaded to the AcceleGrants Document Library when the application opens.

Title IV-A CRP Sections

- Application Details Page
- Content Area Pages
- Equitable Services to Private Schools Pages
 - Private School Services
 - Private School Activities
- Related Documents
 - Equitable Services Documents
 - Title IV-A Job Descriptions
- Budget
- Assurances and other Required Documents

Application Details Page

There are four questions on the application details page:

- Question #1: Needs Assessment
- Question #2: Stakeholder Input
- Question #3: Process for Prioritizing Schools
- Question #4: Direct Administration Costs

Question #1: Needs Assessment

LEAs must conduct a needs assessment at least once every three years to assist in identifying how Title IV-A funds are spent in one or more content areas. ESEA 4106(d)

The response should describe:

- ❑ how the LEA conducted its needs assessment;
- ❑ when the needs assessment was last conducted;
- ❑ which content areas were addressed (LEAs with allocations over \$30,000 must include all three content areas); and
- ❑ the key findings identified in the needs assessment that are relevant to the LEA's Title IV-A application.

Question #2: Stakeholder Input

An LEA must engage stakeholders during the design and development of its Title IV-A plan. Stakeholders include, but are not limited to:

- parents;
- teachers;
- principals;
- specialized instructional support personnel;
- students;
- school leaders;
- community-based organizations;
- local government representatives;
- charter school teachers, principals and parents;
- Indian tribes and tribal organizations; and
- others with relevant and demonstrated expertise in programs and activities designed to meet the purpose of this subpart.

ESSA 4016(c)(1)

Question #2: Stakeholder Input

The response to this question should describe:

- ❑ How the LEA sought feedback from stakeholders
- ❑ Which stakeholders (by role) were invited to give feedback; and
- ❑ How the LEA uses this feedback to inform its Title IV-A plan.

Question #3: Schools Identified for Support

The LEA, or a consortium, must prioritize the distribution of funds to schools based on one or more of the following criteria:

- are among the schools with the greatest needs, as determined by such local educational agency, or consortium;
- have the highest numbers or percentages of students from low-income families who are counted under Title I, Part A;
- are identified for comprehensive support and improvement under section 1111(c)(4)(D)(i);
- are implementing targeted support and improvement plans as described in section 1111(d)(2); or
- are identified as a persistently dangerous public elementary school or secondary school under section 8532 (ESSA 4106(e)(2)(A)). List the school(s) the LEA has identified for interventions and describe the LEAs process for selecting each school.

ESSA Section 4106(e)(2)(A)

Question #3: Schools Identified for Support

The response to this question should include:

- ❑ Which methodology, listed on the previous slide, the LEA and its stakeholders chose to use to identify participating schools;
 - If the LEA and its stakeholders created criteria to identify schools with the greatest need, describe the criteria used by the LEA.
- ❑ Which schools were identified by the LEA and its stakeholders to participate in this program; and
- ❑ What interventions will be offered at each school as a result of this process?

LEAs with one school should respond with “NA”.

Question #4: Administrative Costs

An LEA may reserve up to two percent (2%) of its **original allocation** for direct administrative costs associated with implementing the grant. ESEA Section 4105(c)

The response to this section should:

- ❑ describe how the funds will be used to administer the LEA's Title IV-A program, OR
- ❑ be answered with NA if the LEA is not using direct administration funds.

Remember:

- These costs cannot exceed 2% of the LEA's original allocation. 
- Funds reserved for indirect costs are a separate administrative reserve and should not be included in this response.

Content Area Pages

- ▶ Well-Rounded Education
- ▶ Safe and Healthy Students
- ▶ Effective Use of Technology

Content Area Narratives

❑ Name of Activity

- Create a name for the intervention that can also be used in the budget.
- Describe how this activity aligns with the purpose and intent of well-rounded education in Title IV- A.

❑ Select Participating Schools

- Use the drop-down list to select the participating schools.

❑ Describe the needs identified by the LEA to improve student academic achievement or digital literacy.

This response should describe:

- the needs of students and/or teachers i.e., improving reading scores in grades xyz; expanding student access to AP courses; creating new STEAM programs; increasing classroom learning time/decreasing absenteeism; improving SEL indicators; increasing staff capacity to support blended learning.

Content Area Narratives (continued)

Describe the Activity/Intervention

This response should describe the allowable Title IV-A intervention including:

- ❑ which students and/or staff will participate,
- ❑ how, when, where and by whom the services will be provided,
- ❑ the size and scope of the program (e.g., 3 after school sessions – each 8 weeks x 2 hours a day serving 40 students, with 2 teachers and 2 teacher assistants), and
- ❑ what resources are necessary to support this intervention? Are they being coordinated with other funds?

Content Area Narratives (continued)

Evaluation

This response should describe:

- ❑ how the LEA will periodically assess the effectiveness of the program; and
- ❑ how the LEA will determine if the intervention was successful at the end of the grant period (e.g., attendance records, course completion, assessment results, surveys, student portfolios, observational records).

If this program is a continuation from the prior year, the LEA should describe:

- ❑ what successes have occurred that justify a continuation of the program,
- ❑ any changes that were made to improve the program, and
- ❑ how the LEA will evaluate the effectiveness of the activity for the coming year.

Technology Infrastructure

An LEA, or consortium of LEAs, **may use up to 15 percent of the total funds** set aside, then expended, for the effective use of technology to purchase technology infrastructure, which is defined as:



- “planning activities, which may include development of new instructional models (including blended learning technology software and platforms), the purchase of digital instructional resources, initial professional development activities, and one-time information technology purchases, except that such expenditures may not include expenditures related to significant construction or renovation of facilities.”, and
- “purchasing devices, equipment, and software applications in order to address readiness shortfalls” to support allowable Title IV-A activities.

ESEA Section 4109(a)(4)(A) and (a)(2)(B)

Technology Infrastructure

The response to this question should describe:

- the readiness shortfall OR new digital instructional models identified by the LEA;
- how this request supports student's digital literacy; and
- how this request is supplemental.

Prohibited Uses of ESSA Funds



No ESSA funds may be used—

- ▶ for construction, renovation, or repair of any school facility, except as authorized under this Act;
- ▶ for transportation unless otherwise authorized under this Act (see TIVA FAQs for additional information);
- ▶ 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; or
- ▶ to distribute or to aid in the distribution by any organization of legally obscene materials to minors on school grounds; to provide sex education or HIV-prevention education in schools unless that instruction is age appropriate and includes the health benefits of abstinence; or to operate a program of contraceptive distribution in schools.

ESSA Section 8526

Specific Prohibitions in Title IV-A

- ▶ No funds under this Title may 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.
- ▶ No child shall be required to obtain a prescription for a controlled substance, as defined in section 102 of the Controlled Substance Act (21 U.S.C. 802) as a condition of:
 - receiving an evaluation or other services described under this title; or
 - attending a school receiving assistance under this title.

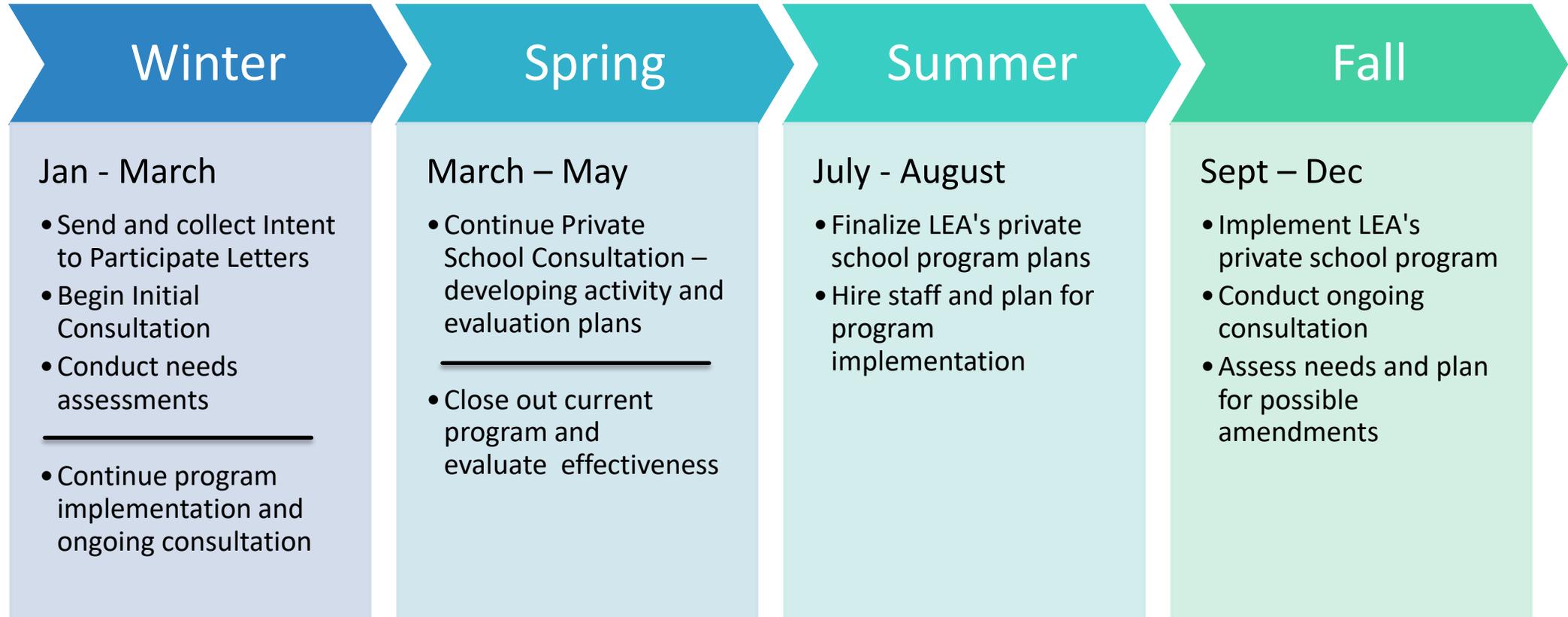
ESSA Section 4001 (b) & (c)

Equitable Services Pages

There are three pages in the application related to providing equitable services to private schools:

- Private School Services page
- Private School Activities page
- Related Documents Page

Equitable Services Timeline



Equitable Services Consultation

- LEAs are **required to consult** with private school officials regarding the provision of Title IV-A equitable services.
- Consultation must continue during the **design, development, implementation, and assessment** of Title IV-A program.
- Consultation must begin **before the LEA makes any decisions about its Title IV-A program, including the transfer of funds.**

ESSA Section 8501(c)(1)

Title IV-A Equitable Services Consultation

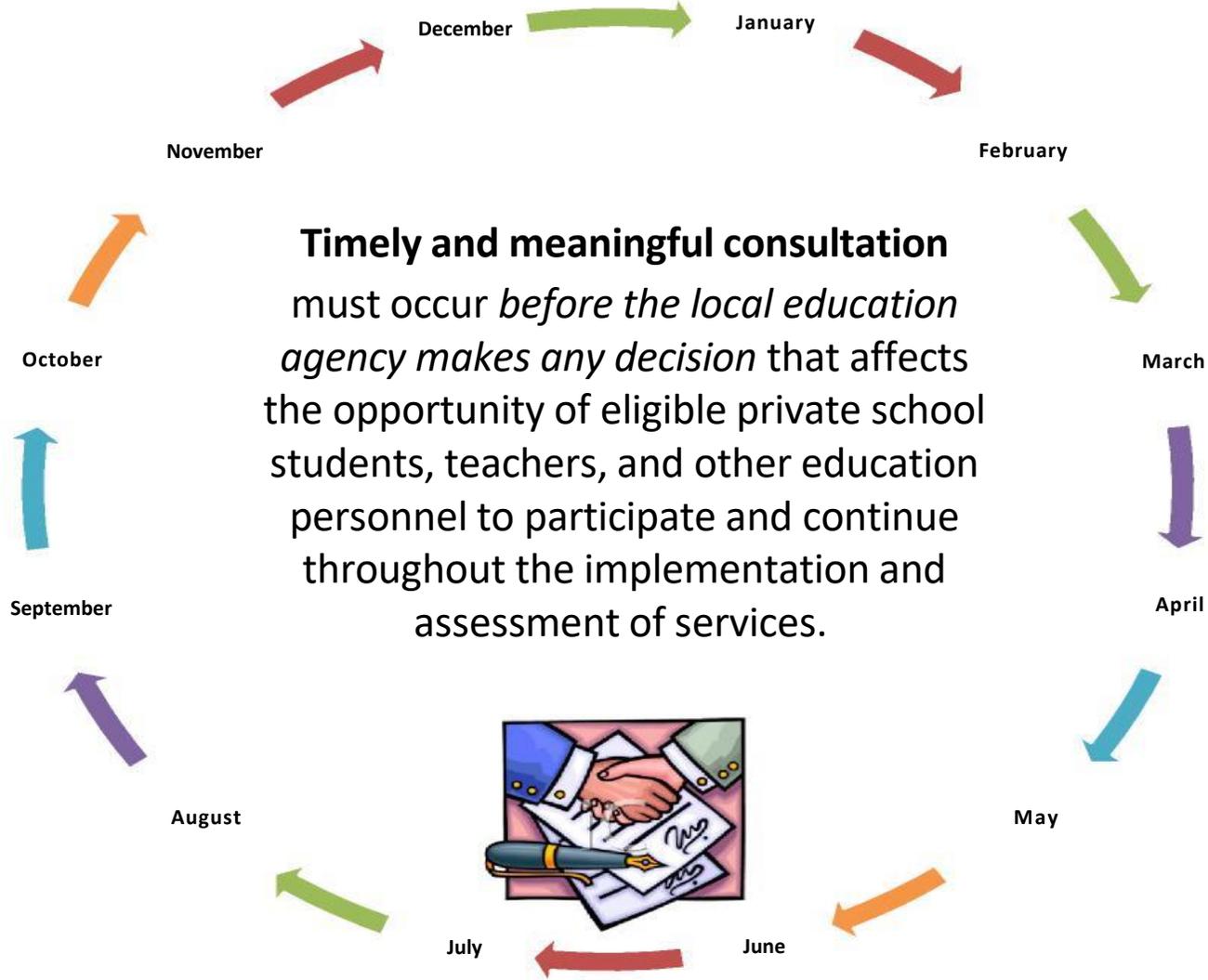
Documentation of Consultation is Required

Needs of Private School Students and Teachers

Amount of Funds Available for Services and How the Amount is Determined

How, where, when and by whom services are provided

Use of 3rd Party Provider and Written Explanation for Not Using 3rd Party Provider



Pooling of Funds

Size and Scope of Services

Providing Services Directly or Via Another Entity

How & When Decisions are Made

Assessment of Services

Using Title IV-A Funds for Equitable Services

Services, materials and equipment must be:

- ▶ secular, neutral and non-ideological;
- ▶ allowable, reasonable and necessary to meet the needs of private school students and their teachers; and
- ▶ supplemental in nature and must not supplant what the private school would otherwise provide absent the federal education services.

The LEA must remain in control of the Title IV-A funds and maintain title to, and administrative control of, materials, equipment and property purchased with these funds.

ESSA Section 8501 and CFR Section 299.9

Complaint Process

If private school officials believe the district did not meet consultation or other requirements, they may file a complaint with RIDE if:

- ▶ consultation was not meaningful or timely;
- ▶ the district did not give due consideration to the views of the private school official; or
- ▶ the district failed to make decisions that treat the private school or its students equitably.

The formal written complaint must be address to RIDE and include:

- ▶ a statement that the LEA has violated a requirement of a federal statute or regulation that applies to a program requiring equitable participation;
- ▶ the facts on which the statement is based and the specific statutory or regulatory requirement allegedly violated; and
- ▶ the signature of the complainant.

ESSA 8503, 34 CFR Section 299.13

Ombudsman

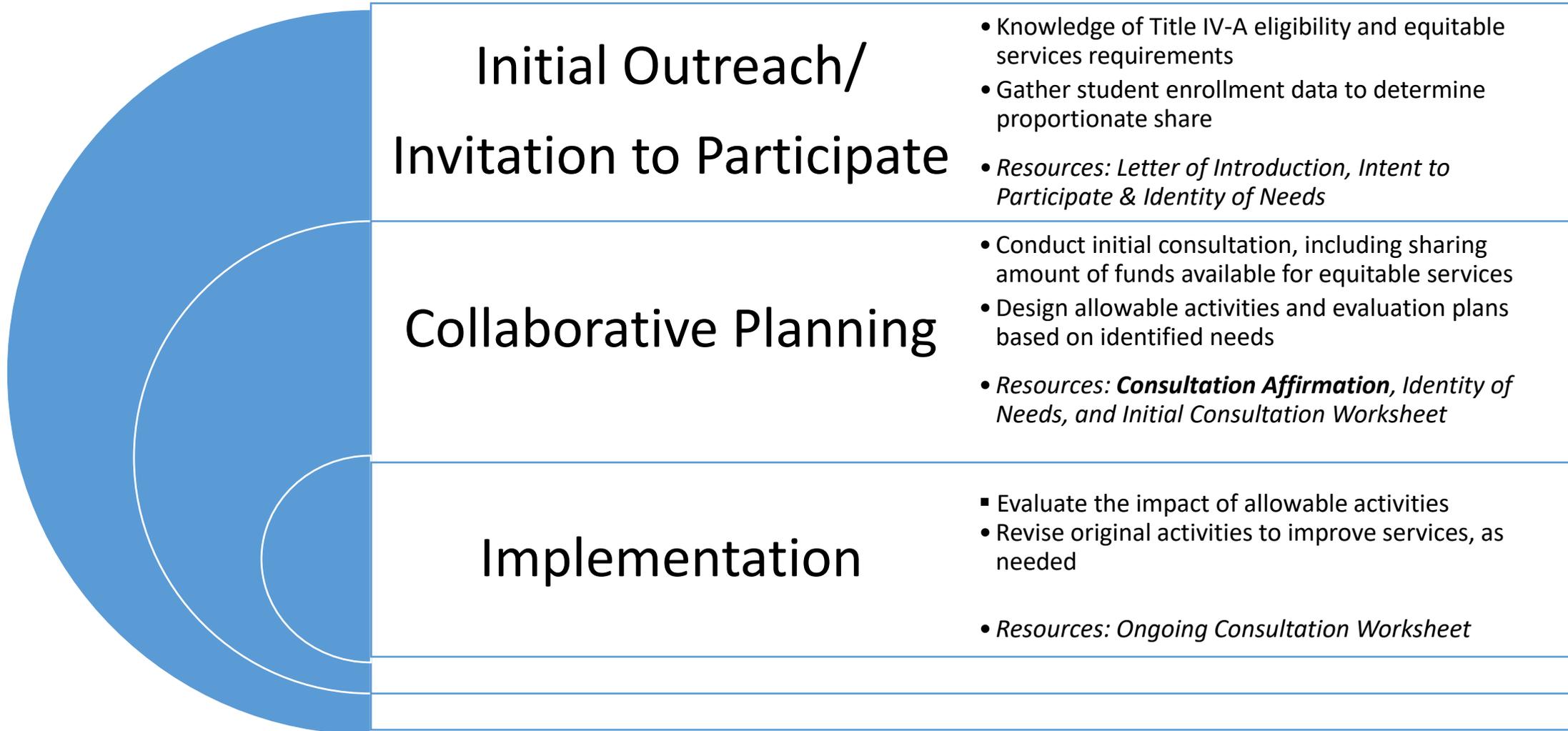
The State-designated **Ombudsman** will monitor and enforce private school consultation and equitable service requirements to help ensure equitable services are provided to private school children, teachers and other educational personnel. Rhode Island's designated Ombudsman is:

Anthony Cottone
Rhode Island Department of Education
255 Westminister Street
Providence, RI 02903

(401) 222-8933
ombudsman@ride.ri.gov

ESSA sections 1117(a)(3)(B) and 8501(a)(3)(B)

Equitable Services Resources



Private School Services Page

In the private school services table indicate:

- ❑ if schools are participating or not participating, and
- ❑ the amount of funds budgeted for equitable services to participating schools.

In the narrative response box, please respond if:

- ❑ there are **carryover funds from the previous year**, then explain why and describe the LEA's plan for providing additional equitable services, and/or
- ❑ the **total amount of funds allocated to private schools from the chart above does not equal the total amount reserved in the budget** for private schools, provide an explanation.

Private School Activity Page

❑ Name of Activity

- Create a name for the intervention that can also be used in the budget.
- Describe how this activity aligns with the intent of the content area.

❑ Select Participating Schools

- Use the drop-down list to select the participating schools.

❑ For each proposed intervention, the response should:

- Describe the needs of private school students and/or teachers.
- Describe the planned intervention, including
 - ▶ which students and/or staff will participate,
 - ▶ how, when, where and by whom the services will be provided,
 - ▶ the size and scope of the program,
 - ▶ how the LEA will periodically assess the effectiveness of the program, and
 - ▶ how the LEA will maintain control of the program.

Related Documents

There are several placeholders for required documents in Related Documents and requirements vary from LEA to LEA.

- ❑ **Equitable Services Calculator** – uploaded as part of the initial application
- ❑ **Equitable Services Calculator (amended)** - uploaded at amendment time
- ❑ **Equitable Services Consultation Documentation**
 - ❑ Upload the signed affirmations from each in district LEA.
 - ❑ Should consultation not be completed within a reasonable period of time the LEA may upload the documentation they have showing the attempts at such consultation have taken place in lieu of a signed consultation agreement.
- ❑ **Title IV-A Funded Job Descriptions** – upload as part of the initial application for any LEA staff
 - ❑ LEAs should highlight any duties that are allocable to the grant.





Title IV-A

Applying for Funds

LEAs can access their Title IV-A funds in the following ways:

- ▶ on their own, or
- ▶ as part of a Consortia.



[Title IV-A Consortium Agreement](#)

Allocation Totals Matter: 20-20-Some Portion Rule

LEAs and consortia with an adjusted *allocation of \$30,000 or more* must expend their Title IV-A funds as follows:

- ▶ no less than 20% of funds for activities to support **well-rounded educational opportunities**;
- ▶ no less than 20% of funds for activities to support **safe and healthy students**; and
- ▶ a portion of funds for activities to support the **effective use of technology**.

LEAs with an adjusted *allocations of less than \$30,000* may expend their funds in one, or more than one, category.



15% Technology Infrastructure Cap

This amount applies to the LEAs entire allocation which is defined as:

LEAs may spend up to 15% of the funds they set aside for the effective use of technology on technology infrastructure (devices, equipment, software and digital content) support one or more activities authorized under section 4109(a)(4)(A) of ESSA

Sample Budget - Allocation of \$30,000 or more

Total allocation of \$50,000	
Administration	\$1,000
Well Rounded	\$10,000
Safe and Healthy	\$24,000
Effective Use of Technology*	
• Effective Use of Technology Activities	\$12,750
• Technology Infrastructure	\$2,250*

* 15% of Effective Use of Technology total

Sample Budget - Allocation under \$30,000

Total allocation of \$20,000	
Administration	\$400
Well Rounded	\$12,000
Safe and Healthy	\$7,600
Effective Use of Technology	
• Effective Use of Technology Activities	\$0
• Technology Infrastructure	\$0

* Direct Administration Costs are capped at 2% of the LEAs original or adjusted allocation.

Allowable Costs



Necessary for the proper and efficient performance of the program.

Reasonable in that it would be a cost that a prudent person would incur under similar circumstances.

Allocable to the program, such that the program must benefit in proportion to the amount charged to the federal program.

Authorized or otherwise not prohibited, by state and local rules.

Documented to justify all fiscal and program requirements.

Creating a Winning Budget



Reserve: Enter the applicable reserve category for all budget entries. For Title IV-A, every budget entry has an applicable reserve category.

Cost Basis: Provide a “number sentence” to provide detail for the cost.

Description: Indicate the position to be funded, service(s) to be provided, or item(s) to be purchased.

Justification: Describe how the request is specific to the program goals and why it is necessary to implement the program.

Title IV-A: Budget Reserves

- ▶ Administration
- ▶ Well-rounded Education Opportunities
- ▶ Safe and Healthy Students
- ▶ Effective Use of Technology
- ▶ Technology Infrastructure
- ▶ Private School: Well-rounded
- ▶ Private School: Safe and Healthy
- ▶ Private School: Effective Use of Technology
- ▶ Private School: Technology Infrastructure

Supplement not Supplant (SNS)

Instances when it is presumed that supplanting has occurred:

- ▶ If the LEA uses Title IV-A funds to provide services that it was required to make available under other federal, state or local laws; or
- ▶ If the LEA uses Title IV-A funds to provide services that it provided with non-federal funds in the prior fiscal year.

Ask Yourself??

- ▶ Is the activity required by Federal, State, or Local law?
- ▶ Was the activity paid for with State or Local funds in the previous year?

If the answer to both is no, then funds are most likely supplemental.

Determining Funds for Equitable Services

Expenditures for services and other benefits provided to eligible private school children, teachers, and other educational personnel must:

- ▶ be equal to the expenditures for participating public school children, taking into account the number and educational needs of the private school children to be served; and
- ▶ be obligated for the fiscal year the funds are received.

Carry-forward funds are only allowable in extenuating circumstances, e. g. pandemic.

- ▶ Good planning and ongoing consultation throughout the year should prevent any unspent balance of equitable share funds.

Equitable Services Proportionate Share Calculator

Private School proportionate share is based upon LEA's Title IV-A allocation

- Transfer of funds in or out of Title IV-A will need to be accounted for within calculator.
- A change in the amount allocated will require an update to the private school share calculation - such as at amendment time.
- Must obligate all (private school) funds in the year made available.

LEA may take administrative costs off the top.

- Such as Indirect Cost Recovery or Direct Administrative Costs.

Calculator assists LEAs to determine proportionate share of each eligible participating private school.

Use of private school student counts from October 1st of the previous school year.

- Counts include all students (K to 12) regardless of district of residency.

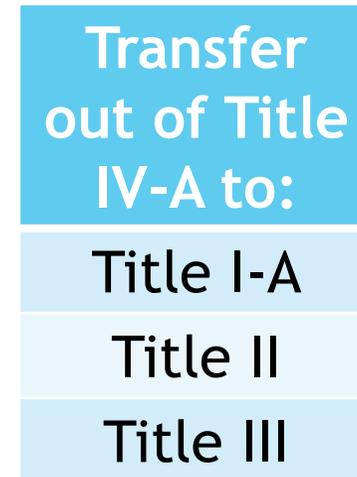
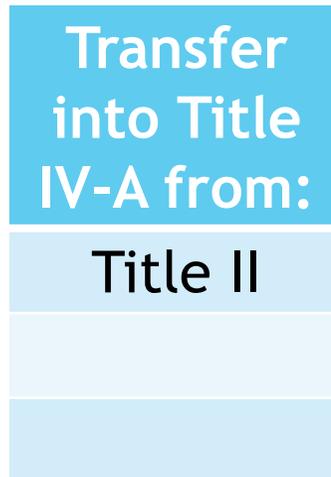
Proportionate Share Calculator

Name of District:		
FY 2022 Calculator used to Determine the Proportionate Share of Title IV, Part A Funds for Equitable Services to Private Schools within the LEA		
A. Number of Students	Example	Input Your LEA's Data Below
A1: District Enrollment (Public Schools)	2,500	
A2: Participating Private Schools Enrollment	150	
A3: Total Enrollment (A1 + A2)	2,650	0
B. Title IV, Part A Allocation		
B1: Total LEA Title IV(A) Allocation for Current Fiscal Year	\$25,000	
B2: Transfer of funds out of Title IV(A) to all other Title programs	\$2,000	
B3: Transfer of funds into Title IV(A) from Title II(A)	\$0	
B4: Administrative Costs (for public and private school programs)	\$400	
B5: LEA Adjusted Allocation = (B1 - B2 + B3 - B4)	\$22,600	\$0
C. Per Pupil Rate		
C1: Adjusted Allocation/Total Enrollment (B5/A3)	\$8.53	#DIV/0!
D. Equitable Services		
D1: Current School/Fiscal Year equitable services share for all participating private schools (A2 x C1)	\$1,279.25	#DIV/0!
D2: Prior School/Fiscal Year unspent balance of funds reserved for equitable services to participating private schools	\$200.00	
D3: Minimum Amount LEA must budget/reserve for equitable services for participating private schools (D1 + D2)	\$1,479.25	#DIV/0!

A Word About Transferability

Keep in mind:

- ▶ Transferred funds must meet the requirements of the program into which they are transferred.
- ▶ LEAs must comply with the relevant equitable services provisions for the affected program and begin consultation before decisions are made by the LEA, taking the needs of the private school students into consideration.
- ▶ Transferring funds does not alleviate LEAs from meeting the Comprehensive Needs Assessment Requirements.
- ▶ Title IV-A is one of the most flexible federal programs. LEAs should look closely at identified needs with their stakeholders before deciding to transfer funds.



Title IV-A Expenditure Report

As part of the Consolidated Final Expenditure Report (FER), LEAs must report on **all funds expended** between July 1st and June 30th for the following categories:

- ▶ Well-Rounded
- ▶ Safe and Healthy
- ▶ Effective Use of Technology
- ▶ Technology Infrastructure
- ▶ Private School Reserves - by reserve type
- ▶ Direct and Indirect Administration Expenditures



FINAL ALLOCATION CALCULATIONS

Final Allocation	\$116,495.00
(+) any Transfers	\$0.00
(-) any Transfers	\$0.00
Adjusted Allocation for Validation Rules	\$116,495.00

Total Reported Expenditures

RESERVE CATEGORY	PRIVATE SCHOOLS	PUBLIC SCHOOLS	TOTAL
Well-Rounded Education Opportunities (Public)	\$0.00	\$52,032.17	\$52,032.17
Safe & Healthy Students (Public)	\$8,383.50	\$62,953.00	\$71,336.50
Effective Use of Technology (Public)	\$0.00	\$2,784.87	\$2,784.87
Technology Infrastructure (Public)	\$0.00	\$0.00	\$0.00
Administration - Direct Expenditures		\$0.00	\$0.00
Administration - Indirect Expenditures		\$0.00	\$0.00
	\$8,383.50	\$117,770.04	\$126,153.54

Final Allocation Table

- Automatically calculated (original allocation +/- any transfers).

Total Reported Expenditures

- LEAs must report on any funds expended between July 1, 2021 and June 30, 2022.
- Public School and Private School expenditures are reported separately.

LEAs with Adjusted Allocations of \$30,000.00 or More

RESERVE CATEGORY	MINIMUM REQUIREMENT	ACTUAL	+/-	MET/NOT MET
Well-Rounded Education Opportunities (Public)	\$23,299.00	\$52,032.17	\$28,733.17	Met
Safe & Healthy Students (Public)	\$23,299.00	\$71,336.50	\$48,037.50	Met
Effective Use of Technology (Public)	\$0.01	\$2,784.87	\$2,784.86	Met

Technology Infrastructure

RESERVE CATEGORY	MAXIMUM ALLOWABLE EXPENDITURES	ACTUAL	+/-	MET/NOT MET
Public Schools	\$0.00	\$0.00	\$0.00	Met
Private Schools	\$0.00	\$0.00	\$0.00	Met

Direct Administration Costs

RESERVE CATEGORY	MAXIMUM ALLOWABLE EXPENDITURES	ACTUAL	+/-	MET/NOT MET
Administration - Direct Expenditures	\$2,329.90	\$0.00	(\$2,329.90)	Met

Once the LEA enters the data, the system will generate reports for each TIV-A reporting rule:

- LEAs with adjusted Allocations of \$30,000 or more (only applies to LEAs with allocations of \$30,000 or more after transfers)
- Technology Infrastructure
- Direct Administration Costs

Determining the Allowability of a Title IV-A Activity

Step 1

- Is the proposed activity informed by the results of a needs assessment and stakeholder engagement? Were schools prioritized for participation?

Step 2

- Is the proposed activity consistent with one of the three content areas?

Step 3

- Is the cost of an activity allowable under the Title IV-A program?
 - Is it reasonable and necessary for performance of the grant, and
 - Is it allocable to the grant (2 CFR Part 200, Subpart E)?

Step 4

- Does the proposed use of funds supplement, and not supplant, other State or local funds that would otherwise be used to pay for the allowable activity?

Step 5

- Is the activity one of the prohibited activities in section 4001(b) or 8526 of the ESEA? If yes, then the activity **would not** be allowable.

Accelegrants Document Library

The **Accelegrants Document Library** contains resources to assist you in the implementation of your Title IV-A program, including:

- [Searchable Title IV-A Statute](#)
- [US ED's SSAE Non-Regulatory Guidance](#)
- [Title IV-A 2022 – 2023 Application Guide](#)
- [Title II and Title IV-A Equitable Services Resources](#)
- [Title IV-A Consortium Agreement](#)
- [RIDE Title IV-A FAQs](#)

There is also a new Title IV-A page on the RIDE website. Be sure to check it out.

We'd love your feedback – [Survey Link](#)

Please reach out to your Title IV-A reviewer with any questions:

- ▶ Stephanie Enos, Stephanie.Enos@ride.ri.gov
- ▶ Eileen Botelho, Eileen.Botelho@ride.ri.gov
- ▶ Ann Hampson, Ann.Hampson@ride.ri.gov

