



ACET, April 2022

Title IV, Part A

Can I Use My Title IV, Part A funds for that?

Rod Pruitt, TIVPA State Initiative Coordinator
Nancy Galle, TIVPA State Initiative Consultant

www.esc14.net/page/t4si





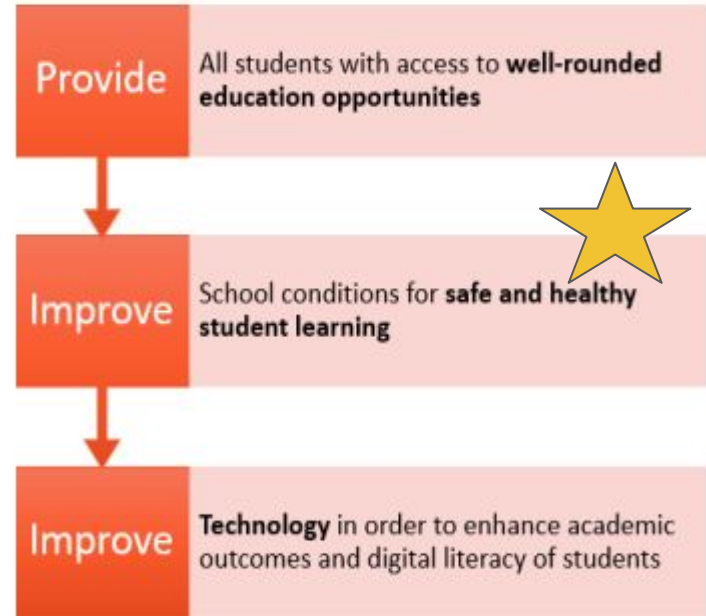
Title IV, Part A School Safety State Initiative

Disclaimer: The information contained in this document is for general information purposes only. You should not rely solely on this information. The contents of this document are subject to change as a result of further potential information and guidance provided by federal and state agencies with regulatory oversight of these programs. Therefore, this document does not constitute legal advice, and entities are advised to seek legal counsel regarding the information and guidance provided in this document before acting on such information and guidance.

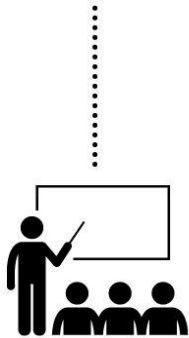


Title IV, Part A Program Intent and Purposes

Grant is designed to improve the academic achievement of all students, by increasing the capacity of LEAs, school, and communities to:



Title IVA School Safety State Initiative Capacity Building Grant



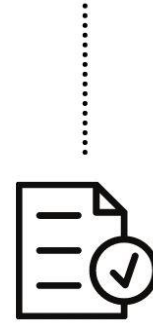
Build
training



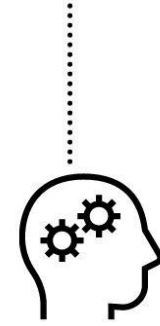
Provide guidance



Technical
Support



Build resources



Learning
opportunities

Under Title IV, Part A, with a focus on **school safety**.



Healthy and Active Lifestyles

- Nutritional Education
- Structured P.E. Activities addressing chronic disease management *led by school nurses*



School-based Mental Health Services

- Individual Counseling
- Group Counseling

Crisis Management and Conflict Resolution Techniques

Implementation of Schoolwide Positive Behavioral Interventions and Supports



Unallowable Use of Funds

Title IV, Part A Statute General Provisions

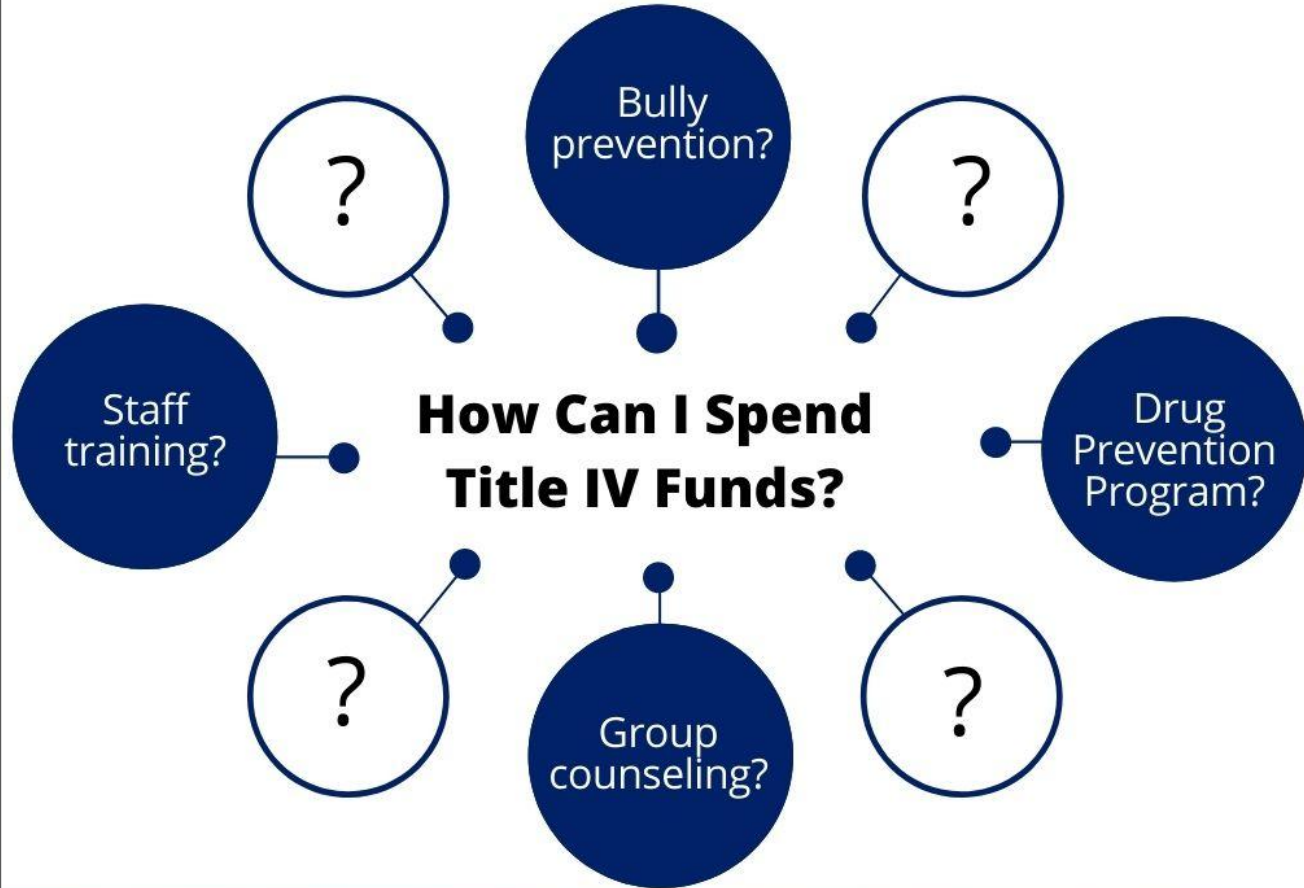
- Section 4001(b)
 - Medical services, drug treatment, or rehabilitation not integrated through Title IV, Part A student supports, referral to treatment, etc.,
- Section 4001(c)
 - Prescriptions for controlled substances

ESSA Statute, Part F, Subpart 2: Uniform Provisions

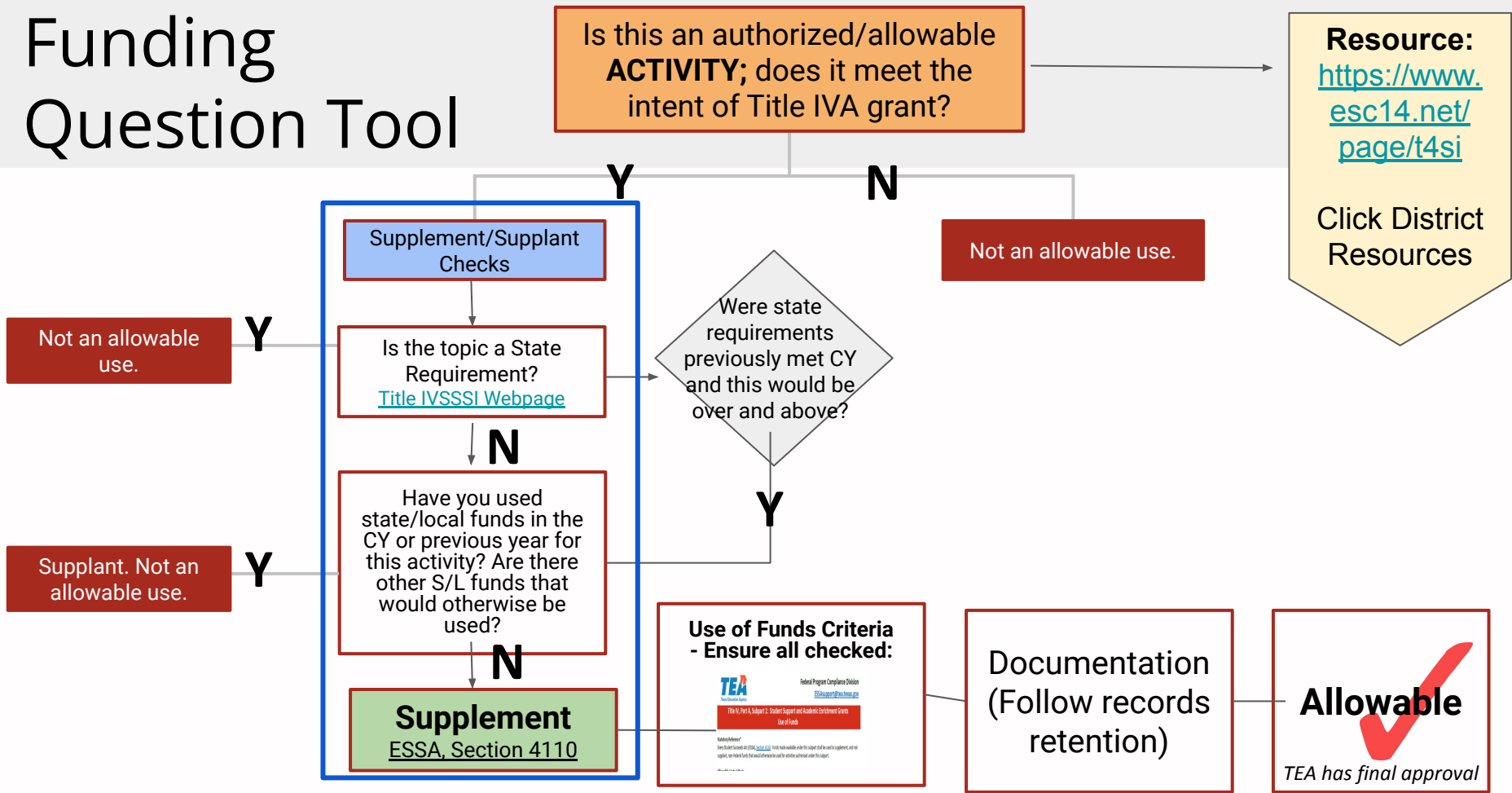
- Section 8526
 - Construction, renovation, or repair

TEA Budgeting Cost Guidance Handbook

Have you asked this question...



Funding Question Tool





Title IVA Funds can be spent on ➡

[USDE](#)

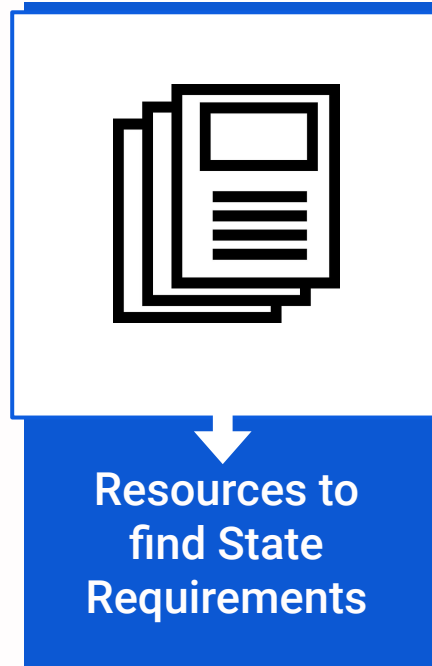
[Non-Regulatory
Guidance](#), p. 27

Table 2. Overview of Authorized Topics Under Section 4108 of the ESEA*

Safe and Supportive Schools	Student Physical and Mental Health
<ul style="list-style-type: none"> • Preventing Bullying and Harassment • Relationship-Building Skills • School Dropout Prevention • Re-Entry Programs and Transition Services for Justice Involved Youth • School Readiness and Academic Success • Child Sexual Abuse Awareness and Prevention • Reducing Use of Exclusionary Discipline Practices and Promoting Supportive School Discipline • Suicide Prevention • Violence Prevention, Crisis Management and Conflict Resolution • Preventing Human Trafficking • Building School and Community Relationships • Culturally Responsive Teaching and Professional Development of Implicit Bias 	<ul style="list-style-type: none"> • Drug and Violence Prevention • Health and Safety Practices in School or Athletic Programs • School-Based Health and Mental Health Services • Healthy, Active Lifestyle, Nutritional Education • Physical Activities • Trauma-Informed Classroom Management • Preventing Use of Alcohol, Tobacco, Marijuana, Smokeless Tobacco, Electronic Cigarettes • Chronic Disease Management
<p>Cross Cutting Authorized Topics Mentoring and School Counseling Schoolwide Positive Behavioral Interventions Pay for Success Initiatives aligned with the purposes of <i>Title IV</i></p>	

*NOTE: This chart provides a summary of topics and is not an exhaustive list

Objective- Better understand Title IVA grant to help determine districts' use of TIVA funds.



Title IV, Part A

School
Safety &
Security

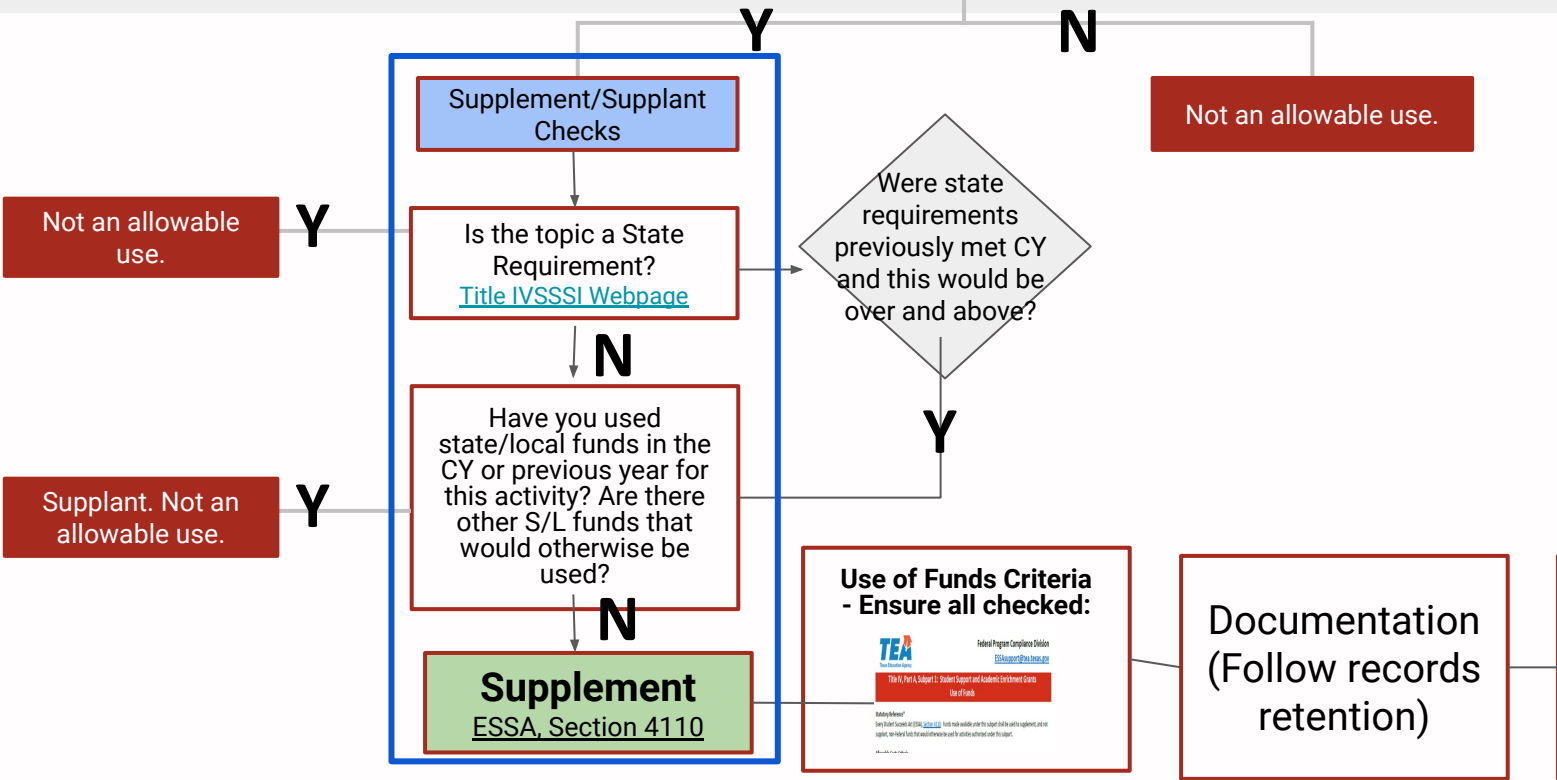
Psychological &
Physical Safety

State
Law



Is this an authorized/allowable **ACTIVITY**; does it meet the intent of Title IVA grant?

- Check Resources:**
- *[TEA Title IV, Part A Website](#)
 - *[Title IV, Part A Program Guide](#)
 - *[Title IV, Part A Frequently Asked Questions](#)
 - *[U.S. Department of Education Non-Regulatory Guidance: Student Support and Academic E Grants](#)
 - *[TIVA Easy Search Statute](#)



Use of Funds Criteria - Ensure all checked:

Federal Program Compliance Division
ESSAcompliance@tea.texas.gov

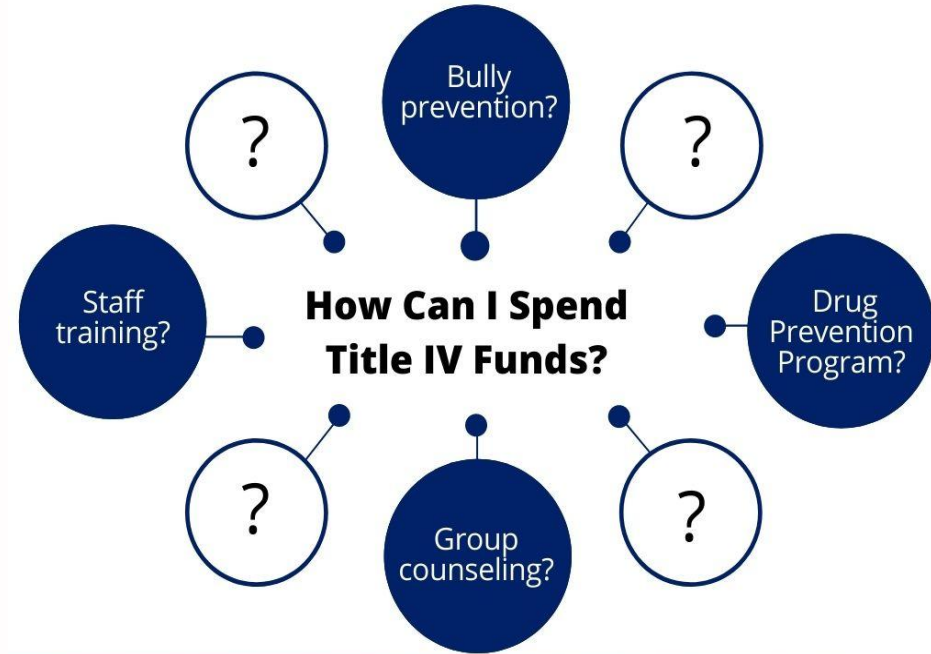
Maximum allowed Title IV, Part A, Subpart 1, Student Support and Academic Enrichment Grants use of funds.

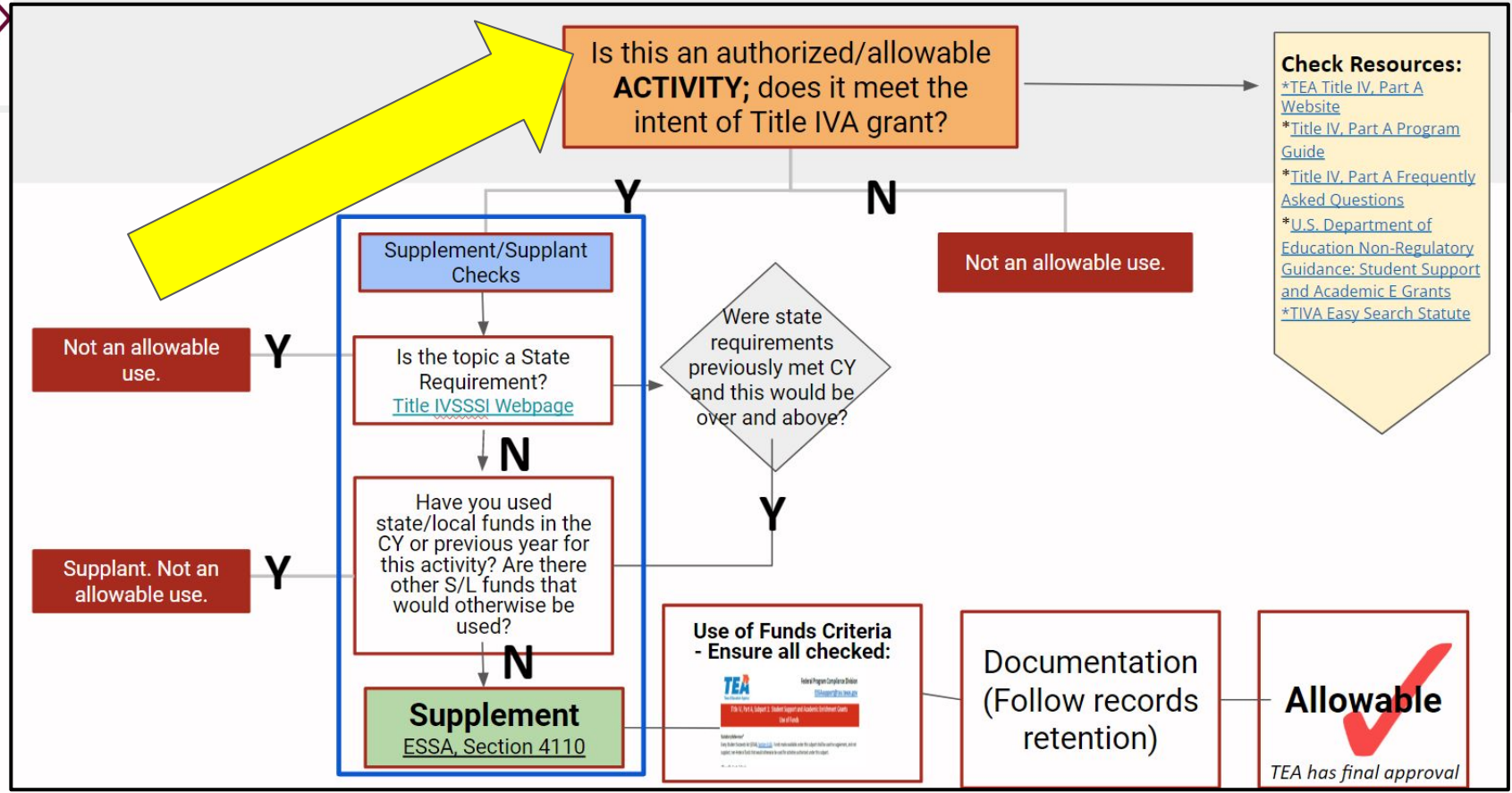
Documentation (Follow records retention)

Allowable
TEA has final approval

Scenario 1...

Can we use funds to support professional development in Trauma-Informed Care?





Is this an authorized/allowable activity; does it meet the intent of Title IVA grant?

TIVA State Initiative Website



Table 2. Overview of Authorized Topics Under Section 4108 of the *ESEA**

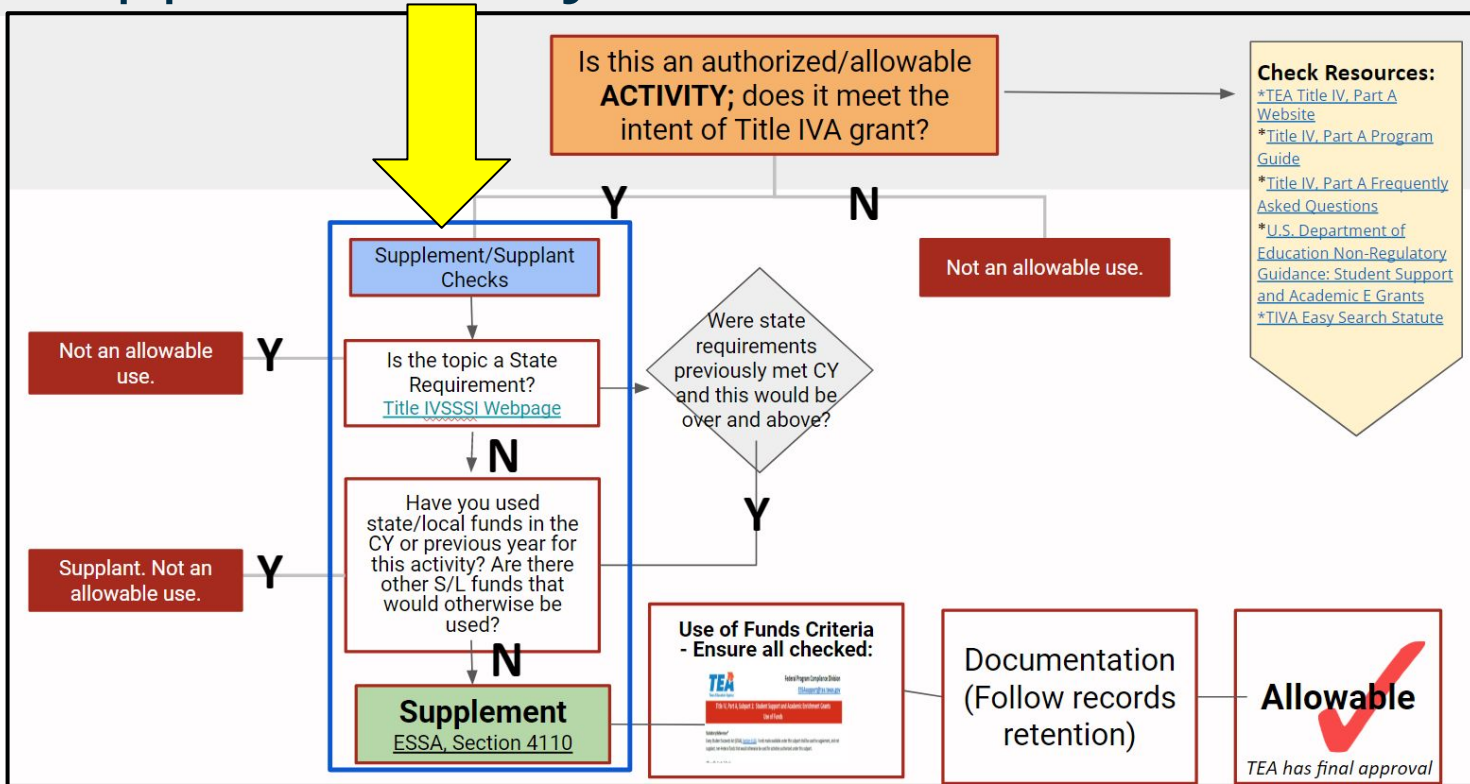
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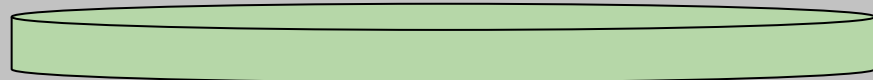
[USDE Non-Regulatory Guidance](#), p. 27



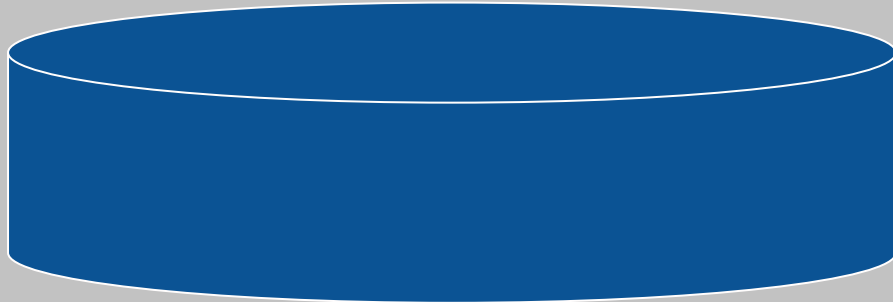
Would using TIVA funds Supplement or Supplant activity?



Supplement or Supplant Review



Title IVA activities (supplement state and local)



State/Local Activities

Used with permission from Vivian Smiry, TEA

Supplement or Supplant Review



Traditional Presumptions of Supplanting

An auditor will presume that supplanting occurs if the federal funds—

- Provide services/activities required by State or local law;
- Provide same services/activities as those provided in prior school year with State or local funds;
- Provide same services/activities in Federal and non-Federal programs.



Documentation



Rebutting the Presumptions of Supplanting

The LEA is responsible for providing documentation to rebut a presumption of supplanting.

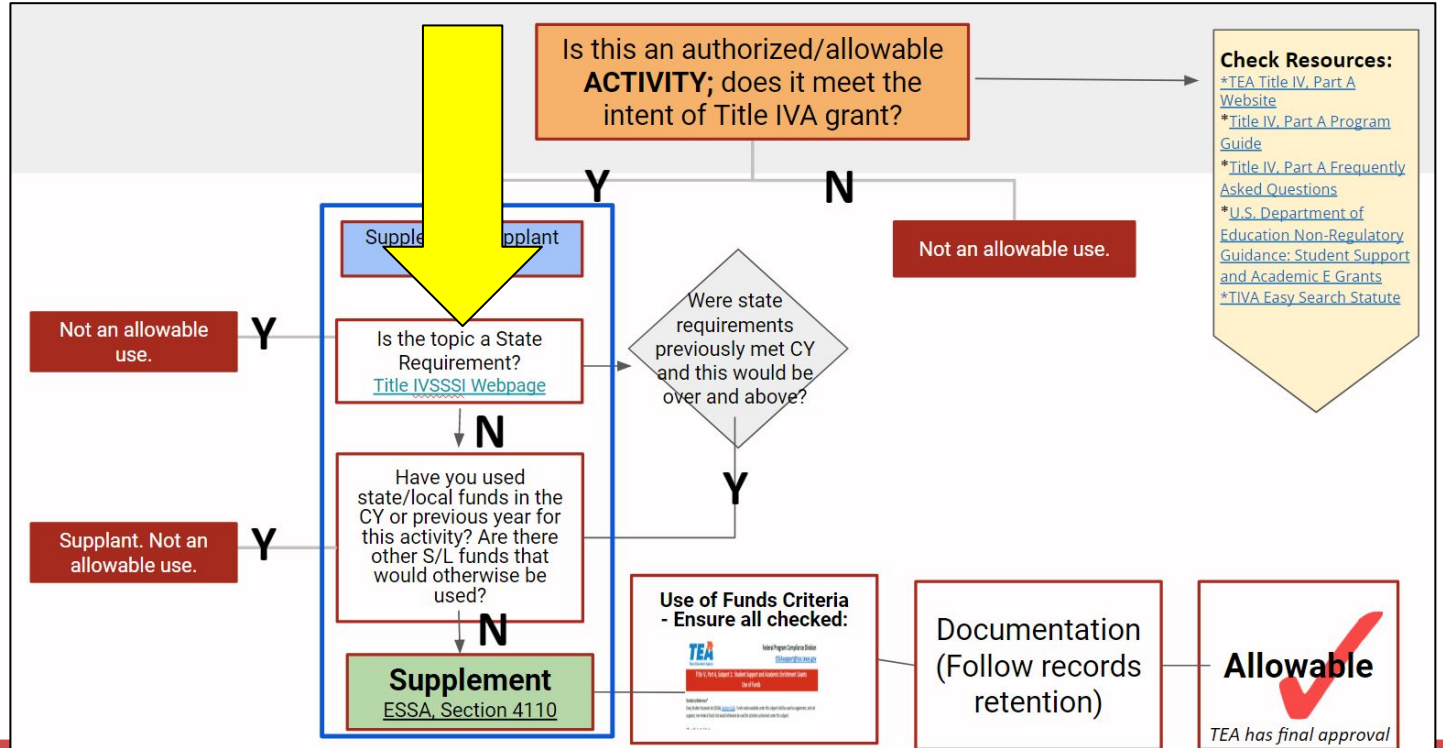
- Documentation of rescission of funds or budget reduction.
- Documentation that prior fund source is no longer available.
- **Written, contemporaneous documentation!**

Used with permission from Vivian SmiryI, TEA



Does this Supplement or Supplant?

Is this already a State Requirement?





Does this Supplement or Supplant?



How do I know if this is a State Requirement?

1. TIVA School Safety State Initiative Website/[District Resources](#)
2. LEA's TASB Policy online (Policy = Law)
3. [TASB training requirements list](#)
4. [TEA Title IV, Part A FAQ](#)

Does this Supplement or Supplant?

Title IV State Initiative
 District/LEA Resources
 ESC Resources
 Parent Resources
 TEA Resources
 Title IV SI FAQ



Title IV, Part A School Safety State Initiative

The goal of this website is to provide guidance and resources to Districts, LEAs, and parents about Title IV, Part A program health requirements, as well as to provide resources to...

- Resources to keep your school safe
- TEA Title IV, Part A In-person training. Click Here for more information.
 - January 27, 2022. in Education Service Center - Region 14
 - February 9, 2022. in Education Service Center - Region 14
 - March 1, 2022. in Education Service Center - Region 14
 - TEA Back to Basics: Federal Grant Management (Updated)
 - TEA Letter, Oct. 28, 2021 - Child Abuse and Neglect Awareness Reminders and Requirements
 - New TEA Title IV, Part A FAQ Document
 - New TEA Federal Programs Collaborative Committee
 - New Title IV, Part A Program Guide 2.0


Region 14
 Education Service Center
 Service for World Class Schools





- Title IV State Initiative
- District/LEA Resources
- ESC Resources
- Parent Resources
- TEA Resources
- Title IV SI FAQ

District/LEA Resources

- Required Training
- Title IV Resources
- Mental Health
- Safety
- Safety Teams
- Training
- Newsletter Archive

TSCA February 2022 Human Trafficking Prevention

Trauma Informed

District/LEA Resources

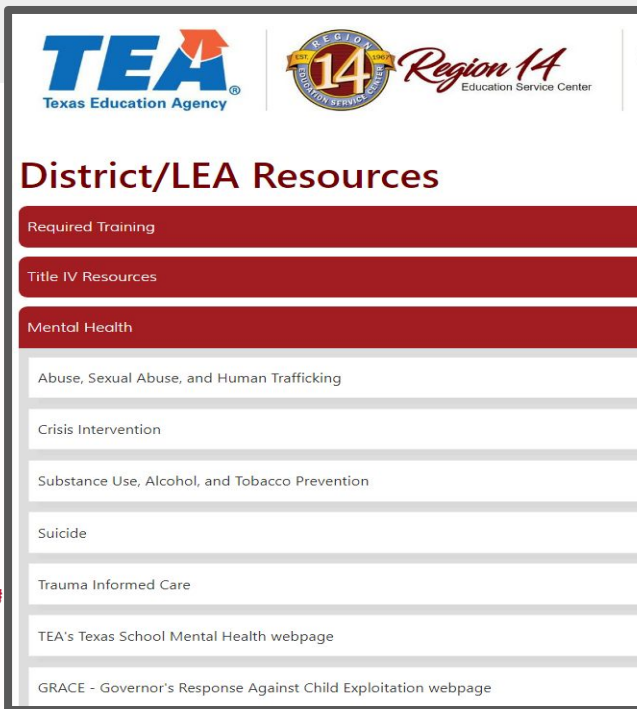
- Required Training
- Title IV Resources
- Mental Health
 - Abuse, Sexual Abuse, and Human Trafficking
 - Crisis Intervention
 - Substance Use, Alcohol, and Tobacco Prevention
 - Suicide
 - Trauma Informed Care
 - TEA's Texas School Mental Health webpage
 - GRACE - Governor's Response Against Child Exploitation webpage



TIVA State Initiative Website



Does this Supplement or Supplant?

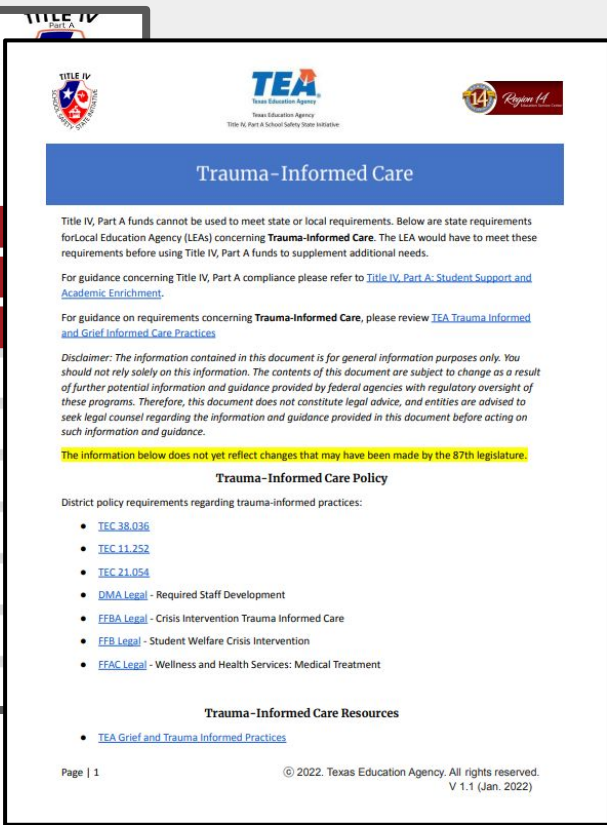


TEA
Texas Education Agency

Region 14
Education Service Center

District/LEA Resources

- Required Training
- Title IV Resources
- Mental Health
 - Abuse, Sexual Abuse, and Human Trafficking
 - Crisis Intervention
 - Substance Use, Alcohol, and Tobacco Prevention
 - Suicide
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TITLE IV
Part A

TEA
Texas Education Agency
Texas Education Agency
Title IV, Part A School Safety State Initiative

Region 14

Trauma-Informed Care

Title IV, Part A funds cannot be used to meet state or local requirements. Below are state requirements for Local Education Agency (LEAs) concerning **Trauma-Informed Care**. The LEA would have to meet these requirements before using Title IV, Part A funds to supplement additional needs.

For guidance concerning Title IV, Part A compliance please refer to [Title IV, Part A- Student Support and Academic Enrichment](#).

For guidance on requirements concerning **Trauma-Informed Care**, please review [TEA Trauma Informed and Grief Informed Care Practices](#)

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The information below does not yet reflect changes that may have been made by the 87th legislature.

Trauma-Informed Care Policy

District policy requirements regarding trauma-informed practices:

- [TEC 38.036](#)
- [TEC 11.252](#)
- [TEC 21.054](#)
- [DMA Legal](#) - Required Staff Development
- [FFBA Legal](#) - Crisis Intervention Trauma Informed Care
- [FFB Legal](#) - Student Welfare Crisis Intervention
- [FFAC Legal](#) - Wellness and Health Services: Medical Treatment

Trauma-Informed Care Resources

- [TEA Grief and Trauma Informed Practices](#)

Page | 1

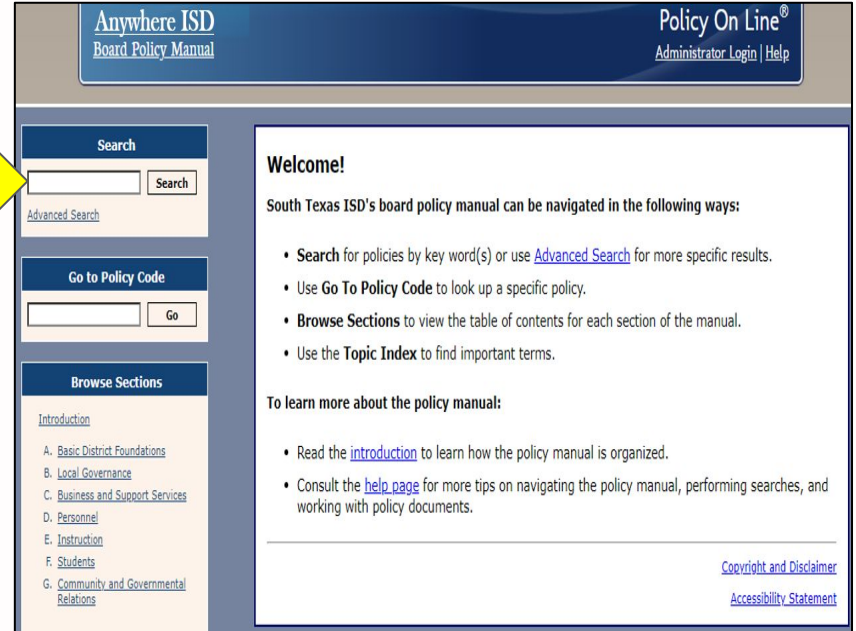
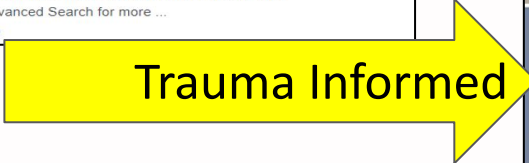
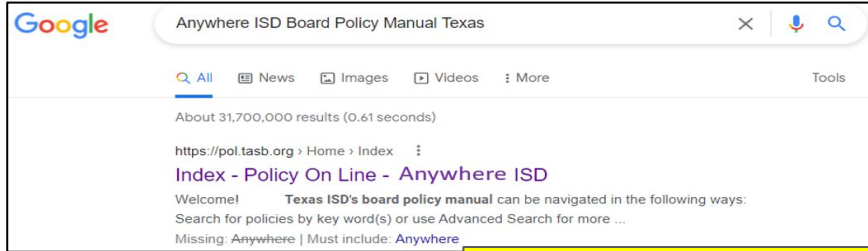
© 2022. Texas Education Agency. All rights reserved.
V 1.1 (Jan. 2022)



[TIVA State Initiative Website](#)



Does this Supplement or Supplant?



Google Search
Local District
Policy On Line



Does this Supplement or Supplant?



TASB training requirements list

School District Training Chart

Published online in [TASB School Law eSource](#)

A variety of staff development trainings are required or recommended for school employees. The requirements are scattered throughout statutes and policies. Some are mandated by law; others are recommended as risk management practices. This chart organizes the requirements and recommendations into a series of lists, organized by topic. Some requirements and recommendations appear under more than one topic to assist the reader.

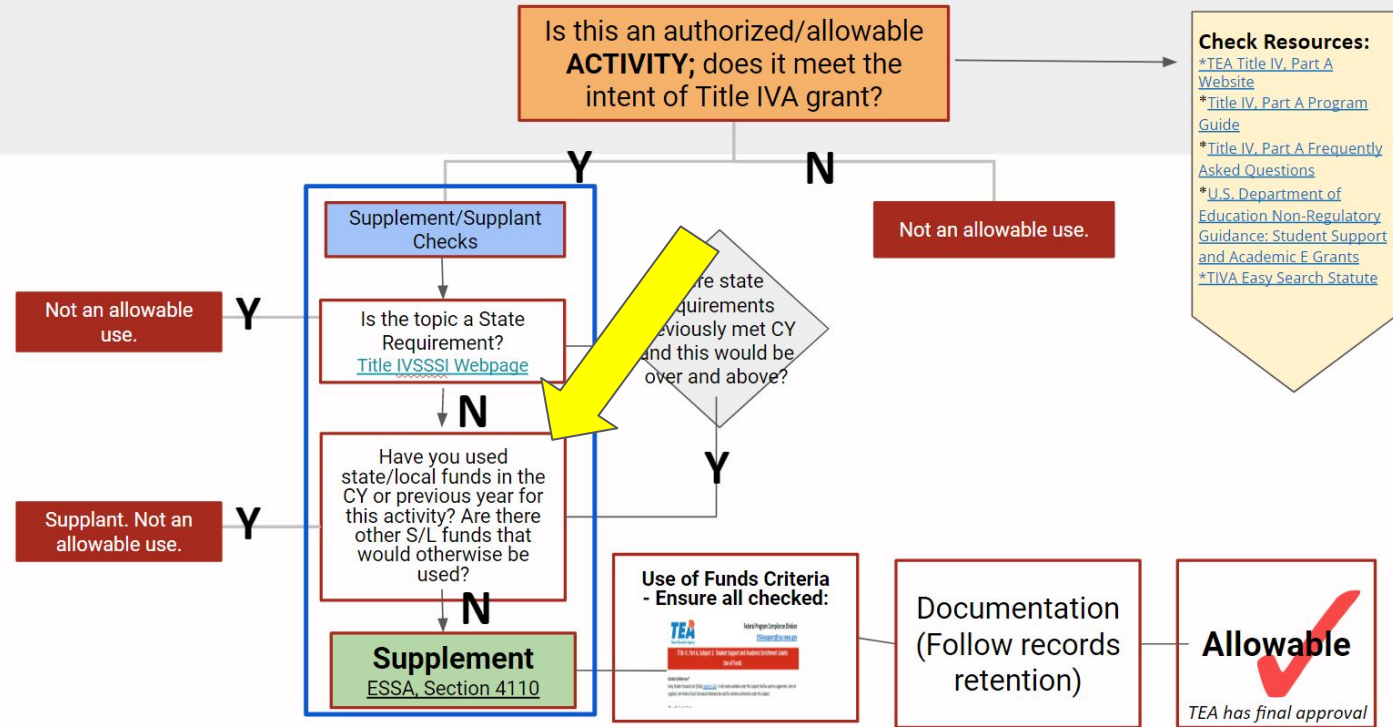
[Student Discipline](#)
[Special Education](#)
[Students with Disabilities](#)
[Student Welfare](#)
[Student Health and Safety](#)
[Emergency Operations](#)
[Employee Welfare](#)
[Facilities Management](#)
[Records Management](#)
[Instructional Programs](#)
[Human Resource Management](#)
[Financial Matters](#)
[Volunteers](#)
[Law Enforcement](#)
[Technology](#)

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TASB Legal Services

1



Does this Supplement or Supplant?





Does this Supplement or Supplant?

Previous/Current Use of Funds?

A source to check:

District's [School Safety Allotment Report](#)

School Safety Allotment Survey (HB1525, Section 31)

The sixth pillar of the SSSP requires team members to support facility safety and security. In addition, the 86th Legislature passed Senate Bill (SB) 11, which created an annual school safety allotment to help fund equipment, programs and training related to school safety and security. More recently, the 87th Legislature enacted House Bill (HB) 1525 that included a provision requiring TEA to publish an annual report regarding the programs, personnel, resources and other purposes section for which the funds were used by LEAs.

To meet this statutory requirement, TEA is adding school safety allotment expenditure questions that LEAs must answer during the **November 2022** SSSP data collection survey for the 2021-2022 school year. Accordingly, LEAs should begin gathering and collecting information and tracking all expenditures of their school safety allotment for their 2022 fiscal year. If funds were expended on items not listed in the survey, LEAs should account for those expenditures under the "other expenditures" question in the survey. The November 2022 SSSP and school safety allotment survey appears below:

(1) **Securing school facilities**, including:

(A) improvements to school infrastructure:

(B) the use or installation of physical barriers:

(C) the purchase and maintenance of:

(i) security cameras or other security equipment:



Does this Supplement or Supplant?

Check TIVA FAQs

Q4. Are Title IV, Part A funds allowable to cover the purchase of curriculum, programs, and training for mental health?

A4. Yes. LEAs may purchase curriculum for evidence-based programs and training objectives listed in FAQ #1 to support school mental health. Costs for any supplemental training plus any curriculum materials, staffing, or coaching that is reasonable and necessary to implement the related program activities in a school under Title IV, Part A.

The following types of basic training required by the state may not be funded by Title IV, Part A:

- Suicide prevention/intervention/postvention
- Recognizing mental health conditions/prevention/intervention
- Substance abuse prevention/intervention
- Grief and **trauma**-informed practices
- Building/maintaining positive relationships and good decision making
- Bullying prevention
- Child maltreatment

For example, if an LEA provides basic trauma informed care training that is required for educators by purchasing an online subscription to a trauma-informed care training with Foundation School Program (FSP) or local funds, then the LEA could supplement that required training with supplemental and advanced training with Title IV, Part A; such as the Trauma Sensitive Schools Framework or PBIS-Integrated Systems Framework for Mental Health or another initiative for school mental health training. In this scenario, Title IV Part A could pay for the supplemental training and curriculum, materials, training, and coaching that is reasonable and necessary to build out a trauma-informed school on a system-wide or district-wide evidence-based strategy for schools.

***Q3. May Title IV, Part A funds be used to support professional development on Trauma-Informed Schools?**

***A3. Trauma-Informed Care is a state requirement per Texas [H.B. 496](#). Therefore, Title IV, Part A funds may not be used to support the state requirements listed in the bill. If there are professional development activities that *are not* listed in state regulations, which would be supplemental and meets the requirements listed in the [Title IV, Part A Use of Funds](#) document, those activities may be allowable.**



Rebutting the Presumptions of Supplanting

The LEA is responsible for providing documentation to rebut a presumption of supplanting.

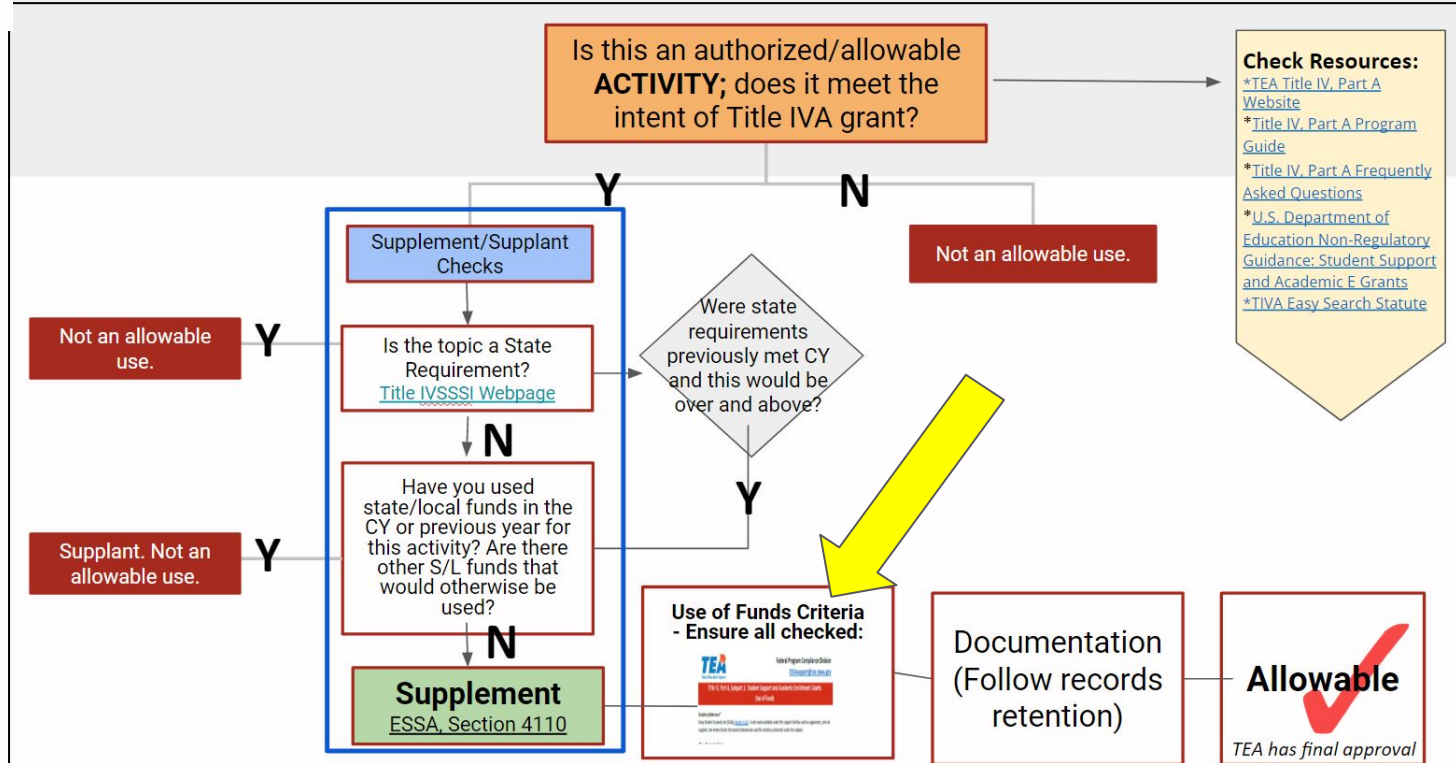
- Documentation of rescission of funds or budget reduction.
- Documentation that prior fund source is no longer available.
- **Written, contemporaneous documentation!**



Documentation



Review Allowable Cost Criteria





Review Allowable Cost Criteria

Title IV, Part A, Subpart 1: Student Support and Academic Enrichment Grants Use of Funds

Statutory Reference*

Every Student Succeeds Act (ESSA), [Section 4110](#). Funds made available under this subpart shall be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under this subpart.

Allowable Costs Criteria

1. Ensure that the LEA has prioritized distribution of Title IV, Part A funds to applicable school campuses [ESSA, [Section 4106\(2\)\(A\)](#)]
2. Ensure that the LEA has consulted with private nonprofit (PNP) schools [ESSA, [Section 4106\(2\)\(B\)](#)];
3. Ensure that activities and/or resources are –
 - o Supplemental [ESSA, [Section 4110](#)];
 - o Identified in required [Comprehensive Needs Assessment](#) which includes data and all [stakeholders](#) [ESSA, Sections [4106\(2\)](#) and [4106\(c\)\(1\)](#)];
 - The planning process meets the requirements for continued consultation of stakeholders and coordination [ESSA, [Section 4106\(c\)\(2\)](#)];
 - o Reasonable;
 - o Necessary to carry out the intent and purpose of the Title IV, Part A program;
 - o Allocable; and
 - o Allowable under Title IV, Part A
4. Ensure that the expenditure(s) meet all EDGAR requirements;
5. Ensure that all LEA policies and procedures were followed;
6. Ensure if Title IV, Part A allocation is over \$30,000 [ESSA, [Section 4106\(e\)\(2\)\(C-E\)](#)];
 - o At least 20% of funds to support Well-Rounded Education Opportunities
 - o At least 20% of funds to support Safe and Healthy Students
 - o Not more than 15% to support the Effective Use of Technology;
 - o The remaining 85% of the funds for this content area must be used for professional development in the use of technology and data;
7. Ensure that no more than 15% is used for purchasing technology infrastructure [ESSA, [Section 4109\(b\)](#)];
 - o Technology infrastructure (devices, equipment, and software applications to address readiness shortfalls) [ESSA, [Section 4109\(a\)\(2\)\(B\)](#)];
8. Ensure that if Title IV, Part A allocation is less than \$30,000
 - o The planning process meets the requirements for continued consultation of stakeholders and coordination [ESSA, [Section 4106\(c\)\(2\)](#)]; and
9. Ensure an evaluation of Title IV, Part A program effectiveness is periodically conducted by the LEA and includes:
 - o A description of program objectives and intended outcomes for all Title IV, Part A activities and how the LEA will periodically evaluate the effectiveness of the activities [ESSA, [Section 4106\(e\)\(1\)\(E\)](#)].

Ensure all checked: Title IV, Part A, Subpart 1: Student Support and Academic Enrichment Grants Use of Funds



Reasonable and necessary?



Evaluation: Measure a positive impact on student achievement?



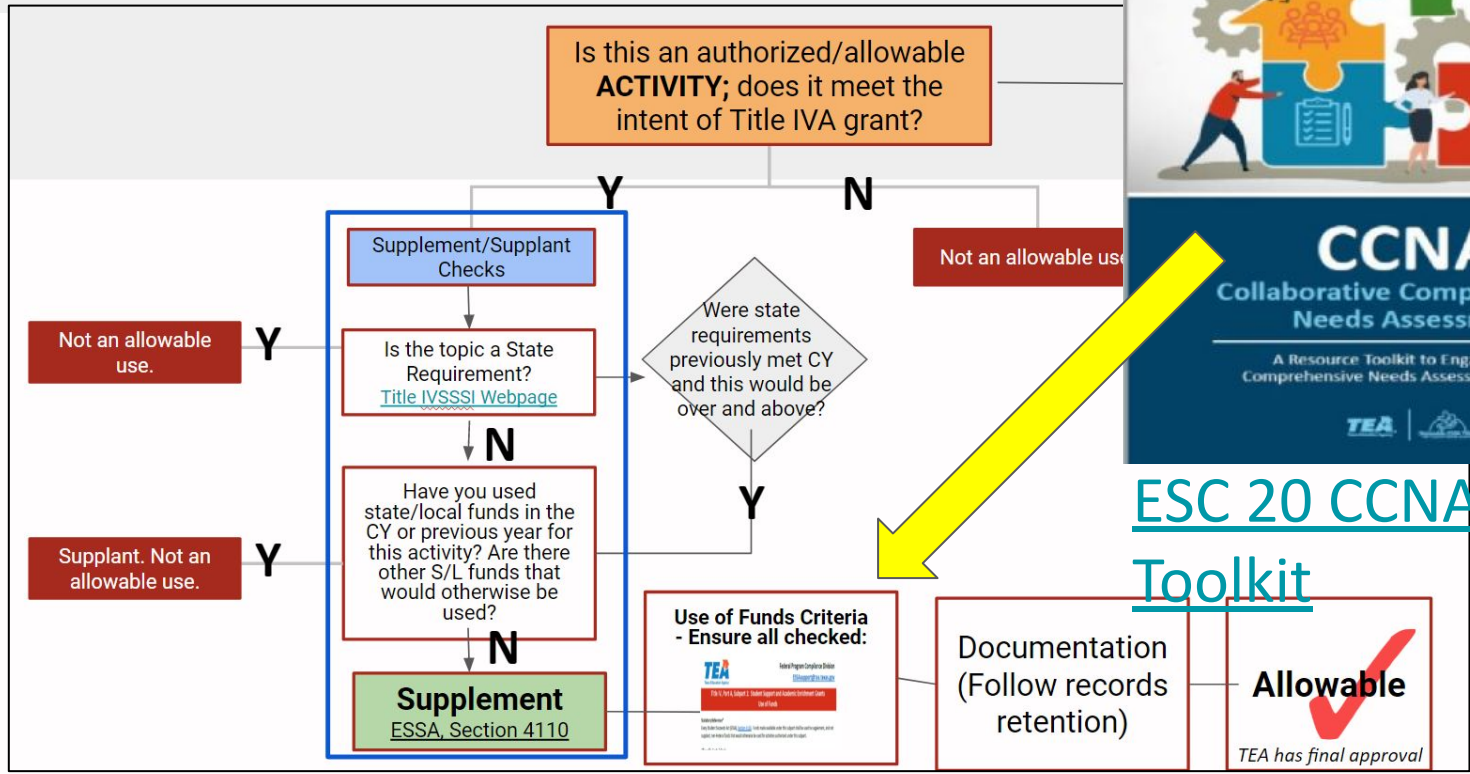
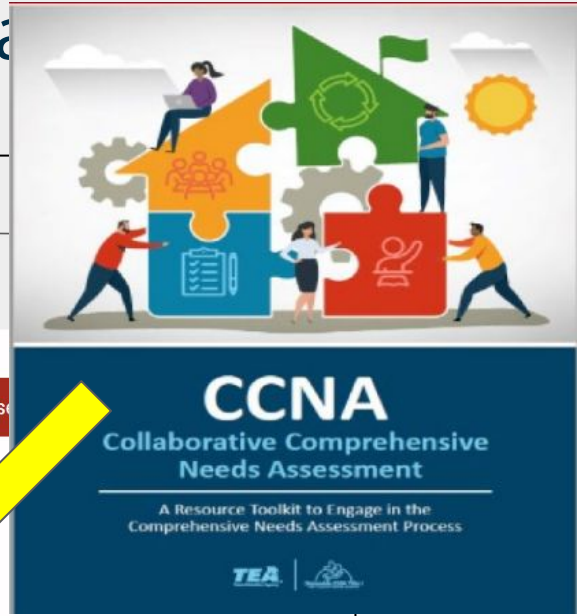
Need identified in Needs Assessment?



Expenditure is supplemental

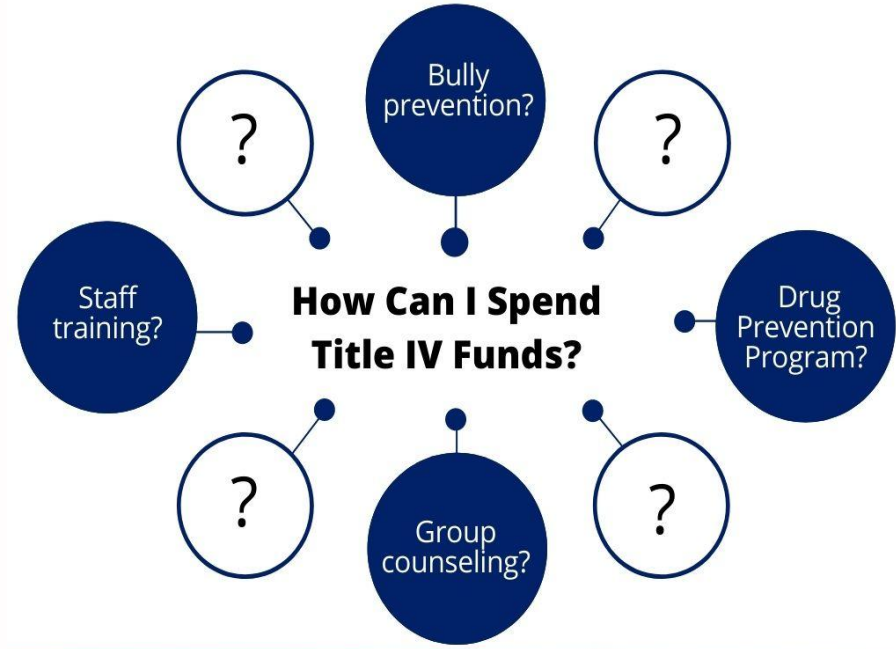


Review Allowable Costs Criteria



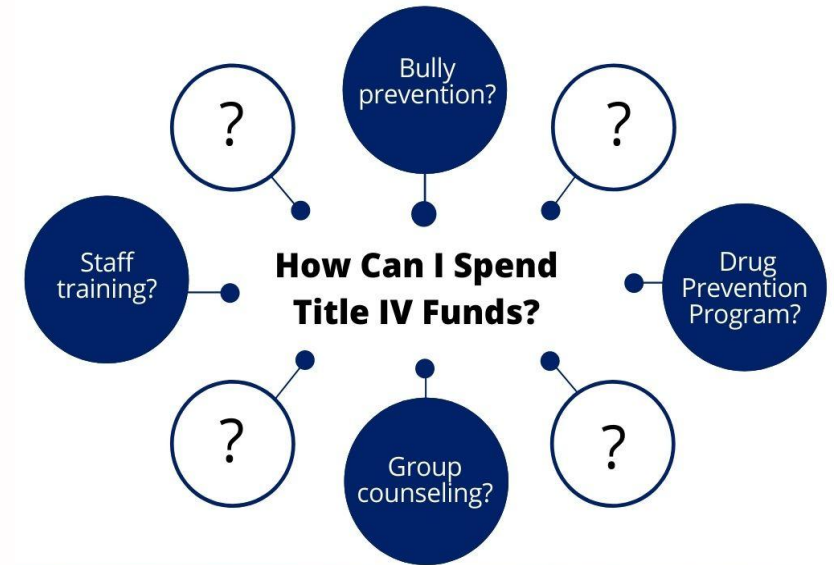
ESC 20 CCNA Toolkit

SO... Can you use funds to support professional development in Trauma-Informed Schools?



Scenario 2...

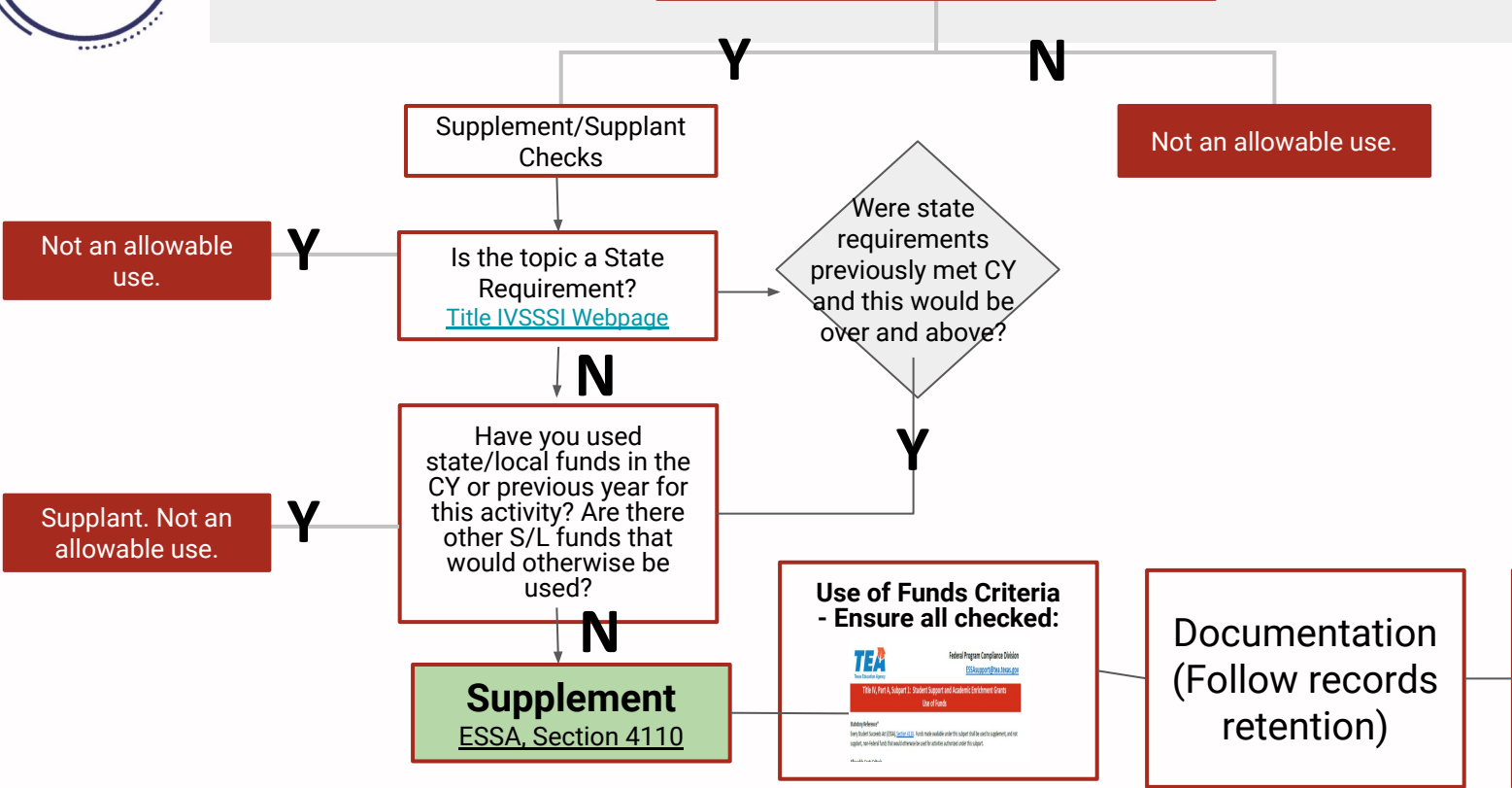
May Title IV, Part A funds be used to support training sessions for staff in bleeding control stations?





Is this an authorized/allowable **ACTIVITY**; does it meet the intent of Title IVA grant?

- Check Resources:**
- *[TEA Title IV, Part A Website](#)
 - *[Title IV, Part A Program Guide](#)
 - *[Title IV, Part A Frequently Asked Questions](#)
 - *[U.S. Department of Education Non-Regulatory Guidance: Student Support and Academic E Grants](#)
 - *[TIVA Easy Search Statute](#)



Use of Funds Criteria - Ensure all checked:

Federal Program Compliance Division
ESSAcompliance@tea.texas.gov

Title IV, Part A, Subpart 1 - Student Support and Academic Enrichment Grants Use of Funds

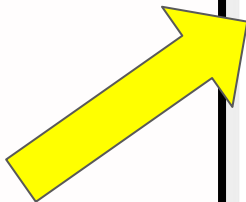
Maximum Allowable Use of Funds: Title IV, Part A, Subpart 1 - Student Support and Academic Enrichment Grants Use of Funds. Funds made available to support Title IV, Part A, Subpart 1 - Student Support and Academic Enrichment Grants must be used for the purposes specified in the statute and this guidance. For more information, visit [www.tea.texas.gov](#).

Documentation (Follow records retention)

Allowable
TEA has final approval

Is this an authorized/allowable activity; does it meet the intent of Title IVA grant?

State Initiative Website



The screenshot shows the website for Region 14 Education Service Center. At the top left is the logo for Region 14 Education Service Center, established in 1967. To the right is the text "Region 14 Education Service Center" and the tagline "Service for World Class Schools". A search bar is located in the top right corner. Below the header is a navigation menu with links for Departments, Programs & Services, R14 Districts, PITStop, Jobs, R14 Service Station, ESC Employees, and About Us. The main content area features a sidebar on the left with a menu for Title IV State Initiative resources, including District/LEA Resources, ESC Resources, Parent Resources, TEA Resources, and Title IV SI FAQ. A large yellow arrow points from the "State Initiative Website" text to this sidebar. To the right of the sidebar are logos for TEA (Texas Education Agency) and Region 14 Education Service Center, along with a logo for the Title IV School Safety State Initiative. Below these logos is the heading "District/LEA Resources". Under this heading, there are two red bars: "Required Training" and "Title IV Resources". Below the "Title IV Resources" bar is a list of resources with arrows pointing to them: "Office of Elementary & Secondary Education Title IV 21st Century Schools Statute" (yellow arrow), "Every Student Succeeds Act Title IV, Part A Statute (easy to search)" (red arrow), "US Department of Education Title IV, Part A Non-Regulatory Guidance" (red arrow), "TEA Title IV, Part A Webpage" (yellow arrow), and "Title IV, Part A Program Guide 2.0" (yellow arrow).



Is this an authorized/allowable activity; does it meet the intent of Title IVA grant?



Title IV 21st Century Schools

SEC. 4108. [20 U.S.C. 7118] (C)(i)(ii)
ACTIVITIES TO SUPPORT SAFE AND HEALTHY STUDENTS.

[Office of Elementary & Secondary Education](#)
[Title IV 21st Century Schools Statute](#)

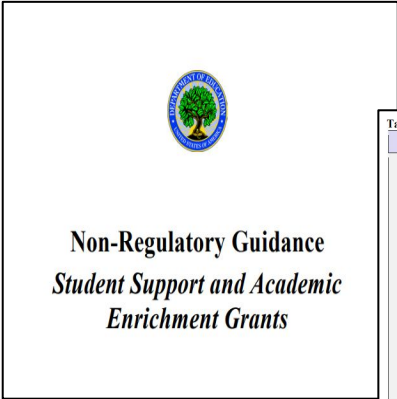


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Safe and Supportive Schools	Student Physical and Mental Health
<ul style="list-style-type: none"> Preventing Bullying and Harassment Relationship-Building Skills School Dropout Prevention Re-Entry Programs and Transition Services for Justice Involved Youth School Readiness and Academic Success Child Sexual Abuse Awareness and Prevention Reducing Use of Exclusionary Discipline Practices and Promoting Supportive School Discipline Suicide Prevention Violence Prevention, Crisis Management and Conflict Resolution Preventing Human Trafficking Building School and Community Relationships Culturally Responsive Teaching and Professional Development of Implicit Bias 	<ul style="list-style-type: none"> Drug and Violence Prevention Health and Safety Practices in School or Athletic Programs School-Based Health and Mental Health Services Healthy, Active Lifestyle, Nutritional Education Physical Activities Trauma-Informed Classroom Management Preventing Use of Alcohol, Tobacco, Marijuana, Smokeless Tobacco, Electronic Cigarettes Chronic Disease Management
<p>Cross Cutting Authorized Topics Mentoring and School Counseling Schoolwide Positive Behavioral Interventions Pay for Success Initiatives aligned with the purposes of Title IV</p>	

*NOTE: This chart provides a summary of topics and is not an exhaustive list

<https://www2.ed.gov/policy/elsec/leg/essa/essaagrntguid10212016.pdf>



Is this an authorized/allowable activity; does it meet the intent of Title IVA grant?



TITLE IV, PART A, SUBPART 1: STUDENT SUPPORT AND ACADEMIC ENRICHMENT PROGRAM GUIDE

Federal Program Compliance Division
Department of Grant Compliance and Administration
(512) 463-9499
ESSASupport@tea.texas.gov

3. Programs or activities that—

- integrate health and safety practices into school or athletic programs;
- support a healthy, active lifestyle, including nutritional education and regular, structured physical education activities and programs, that may address chronic disease management with instruction led by school nurses, nurse practitioners, or others to help maintain the well-being of students;



Federal Program Compliance Division

ESSASupport@tea.texas.gov

Title IV, Part A Frequently Asked Questions

This document provides the answers to program-related questions received by the Division. You can also navigate through the document using the Bookmarks in your PDF viewer. The newest questions that have been added will be noted by "*" and in red font.

For questions or additional information, please contact us at ESSASupport@tea.texas.gov.

Questions and responses are organized by the following topic areas:

- [Federal Requirements](#)
- [Supplant, Not Supplant \(SNS\) Requirements](#)
- [Comprehensive Needs Assessment \(CNA\)](#)
- [Use of Funds](#)
- [Well-Rounded Education Opportunities](#)
- [Safe and Healthy Students](#)
- [Effective Use of Technology](#)
- [Private Nonprofit \(PNP\) Equitable Services](#)
- [Mental Health Services](#)
- [Parent and Family Engagement](#)
- [Shared Services Agreement \(SSA\)](#)
- [Flexibility, Transferability, Waivers, and Carryover](#)
- [State Requirements](#)

Federal Requirements

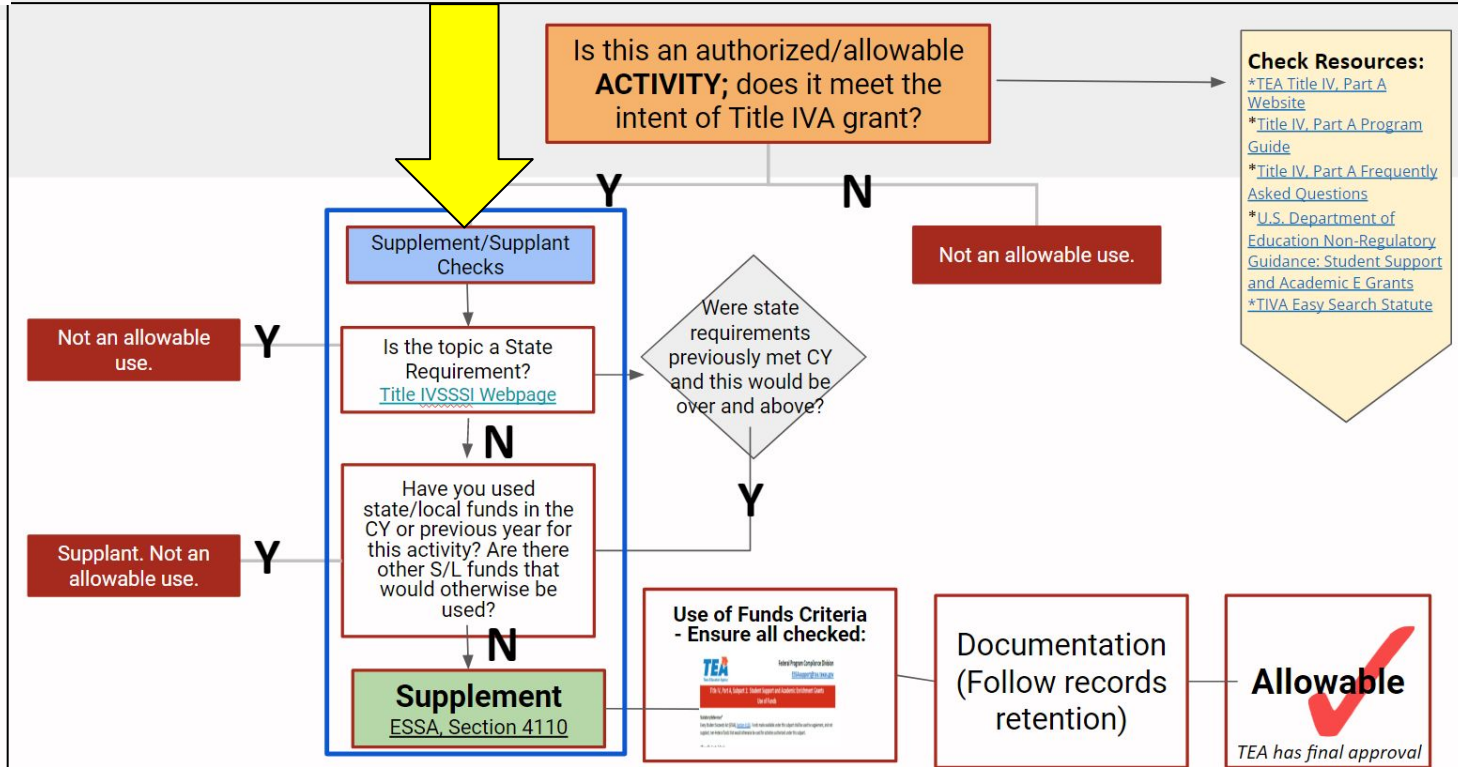
Q1: What requirements should an LEA consider when determining if Title IV, Part A funds may support

***Q4. May Title IV, Part A funds be used to support training sessions for staff in bleeding control stations?**

***A4. No, it is a state requirement. Texas H.B. 496 requires bleeding control stations, stop the bleed kits, instructions, and training for all charter schools and districts. Therefore, using Title IV, Part A funds for this state requirement would be supplanting.**



Would using TIVA funds Supplement or Supplant activity?





Supplement or Supplant activity?



How do I know if this is a State Requirement?

1. TIVA School Safety State Initiative Website/[District Resources](#)
2. LEA's TASB Policy online (Policy = Law)
3. [TASB training requirements list](#)
4. [TEA Title IV, Part A FAQ](#)



Does this Supplement or Supplant?

TEA Texas Education Agency | **Region 14** Education Service Center | **TITLE IV Part A SCHOOL SAFETY STATE INITIATIVE**

District/LEA Resources

- Required Training
- Title IV Resources
- Mental Health
- Safety
 - AED/CPR Training
 - Bully Prevention
 - Conflict Resolution
 - Dating Violence
 - Extracurricular Safety Training
 - Multi-Hazard Emergency Operation Plan
 - Traumatic Bleeding Protocol

Bleeding

TEA Texas Education Agency | **Federal Program Compliance Division**
ESSASupport@tea.texas.gov

Title IV, Part A Frequently Asked Questions

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- [Shared Services Agreement \(SSA\)](#)
- [Flexibility, Transferability, Waivers, and Carryover](#)
- [State Requirements](#)

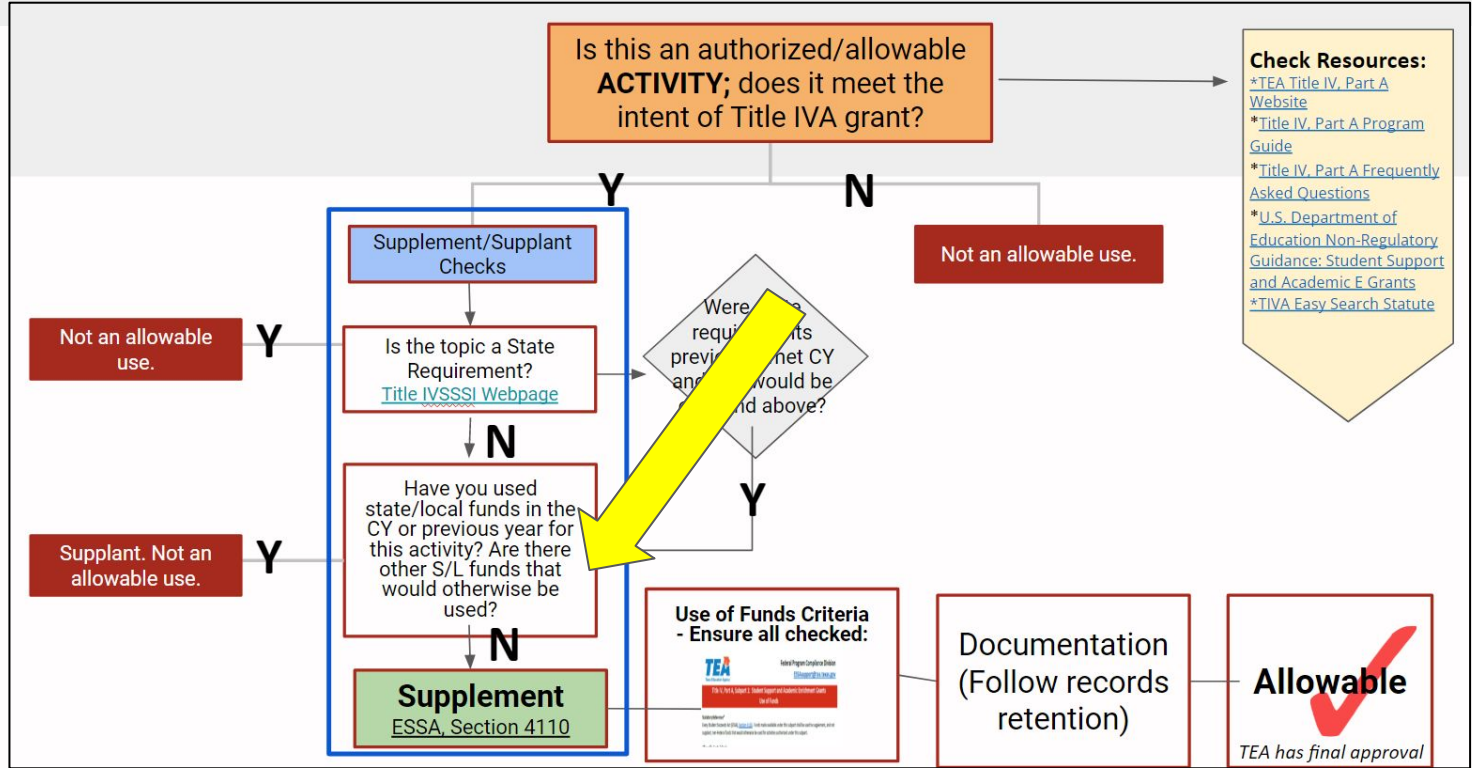
Federal Requirements

Q1: What requirements should an LEA consider when determining if Title IV, Part A funds may support allowable programs and activities?

- *Q4.** May Title IV, Part A funds be used to support training sessions for staff in bleeding control stations?
- *A4.** No, it is a state requirement. Texas [H.B. 496](#) requires bleeding control stations, stop the bleed kits, instructions, and training for all charter schools and districts. Therefore, using Title IV, Part A funds for this state requirement would be supplanting.

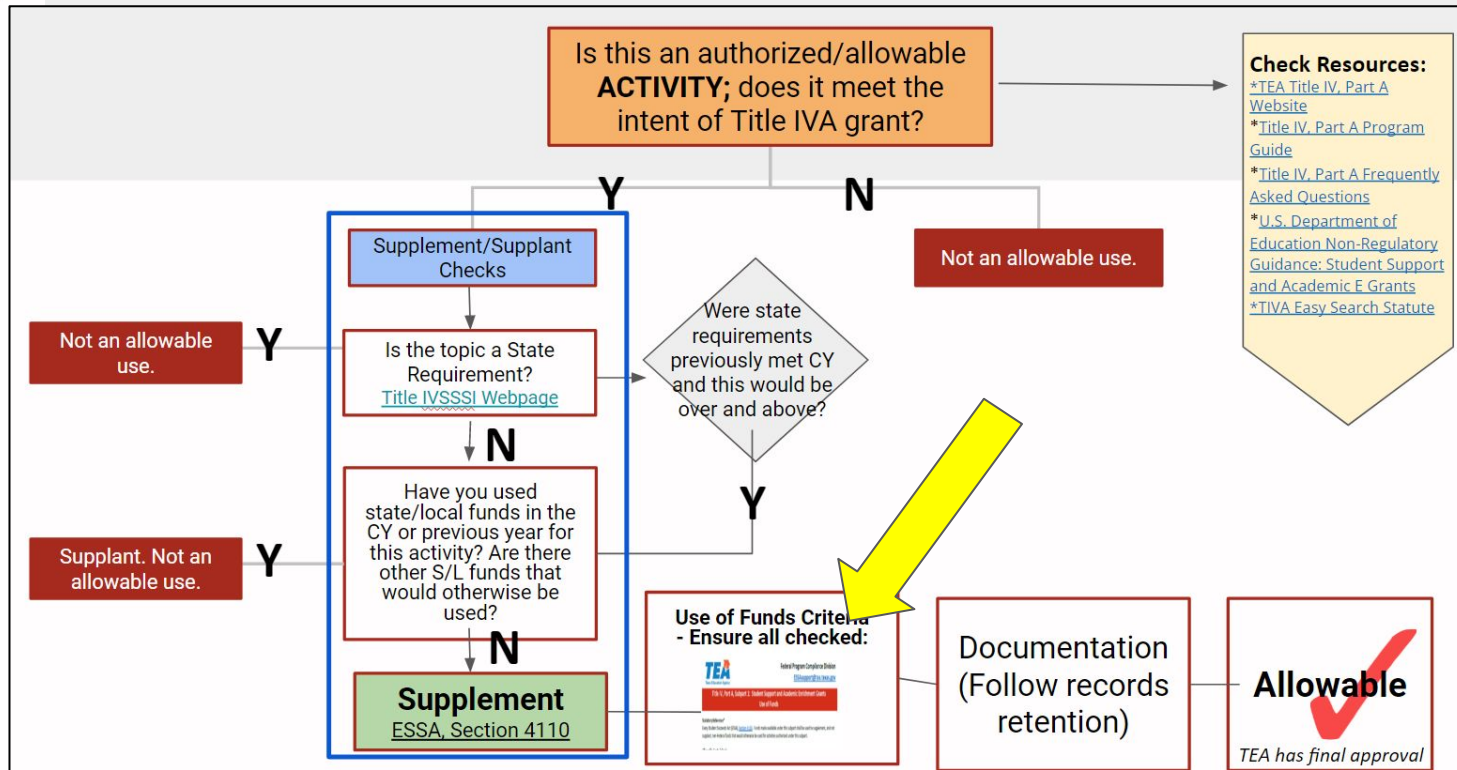
[TIVA State Initiative Website](#)

Does this Supplement or Supplant?





Review Allowable Cost Criteria





Review Allowable Cost Criteria

Title IV, Part A, Subpart 1: Student Support and Academic Enrichment Grants Use of Funds

Statutory Reference*

Every Student Succeeds Act (ESSA), [Section 4110](#). Funds made available under this subpart shall be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under this subpart.

Allowable Costs Criteria

- Ensure that the LEA has prioritized distribution of Title IV, Part A funds to applicable school campuses [ESSA, [Section 4106\(2\)\(A\)](#)]
- Ensure that the LEA has consulted with private nonprofit (PNP) schools [ESSA, [Section 4106\(2\)\(B\)](#)];
- Ensure that activities and/or resources are –
 - Supplemental [ESSA, [Section 4110](#)];
 - Identified in required [Comprehensive Needs Assessment](#) which includes data and all [stakeholders](#) [ESSA, Sections [4106\(2\)](#) and [4106\(c\)\(1\)](#)];
 - The planning process meets the requirements for continued consultation of stakeholders and coordination [ESSA, [Section 4106\(c\)\(2\)](#)];
 - Reasonable;
 - Necessary to carry out the intent and purpose of the Title IV, Part A program;
 - Allocable; and
 - Allowable under Title IV, Part A
- Ensure that the expenditure(s) meet all EDGAR requirements;
- Ensure that all LEA policies and procedures were followed;
- Ensure if Title IV, Part A allocation is over \$30,000 [ESSA, [Section 4106\(e\)\(2\)\(C-E\)](#)];
 - At least 20% of funds to support Well-Rounded Education Opportunities
 - At least 20% of funds to support Safe and Healthy Students
 - Not more than 15% to support the Effective Use of Technology;
 - The remaining 85% of the funds for this content area must be used for professional development in the use of technology and data;
- Ensure that no more than 15% is used for purchasing technology infrastructure [ESSA, [Section 4109\(b\)](#)];
 - Technology infrastructure (devices, equipment, and software applications to address readiness shortfalls) [ESSA, [Section 4109\(a\)\(2\)\(B\)](#)];
- Ensure that if Title IV, Part A allocation is less than \$30,000
 - The planning process meets the requirements for continued consultation of stakeholders and coordination [ESSA, [Section 4106\(c\)\(2\)](#)]; and
- Ensure an evaluation of Title IV, Part A program effectiveness is periodically conducted by the LEA and includes:
 - A description of program objectives and intended outcomes for all Title IV, Part A activities and how the LEA will periodically evaluate the effectiveness of the activities [ESSA, [Section 4106\(e\)\(1\)\(E\)](#)].

Ensure all checked: Title IV, Part A, Subpart 1: Student Support and Academic Enrichment Grants Use of Funds



Reasonable and necessary?



Evaluation: Measure a positive impact on student achievement?



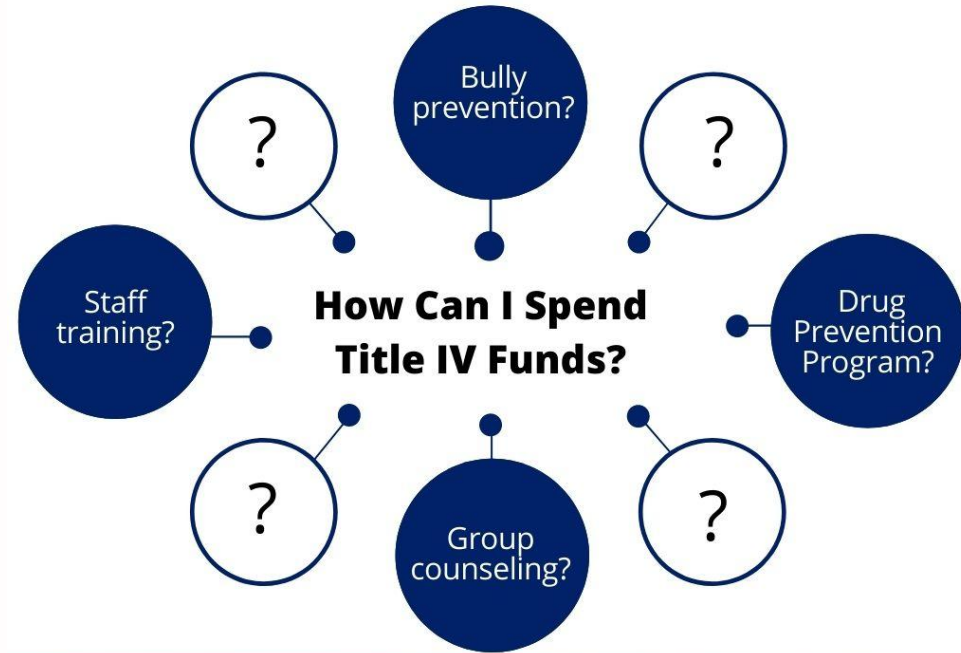
Need identified in Needs Assessment?



Expenditure is supplemental

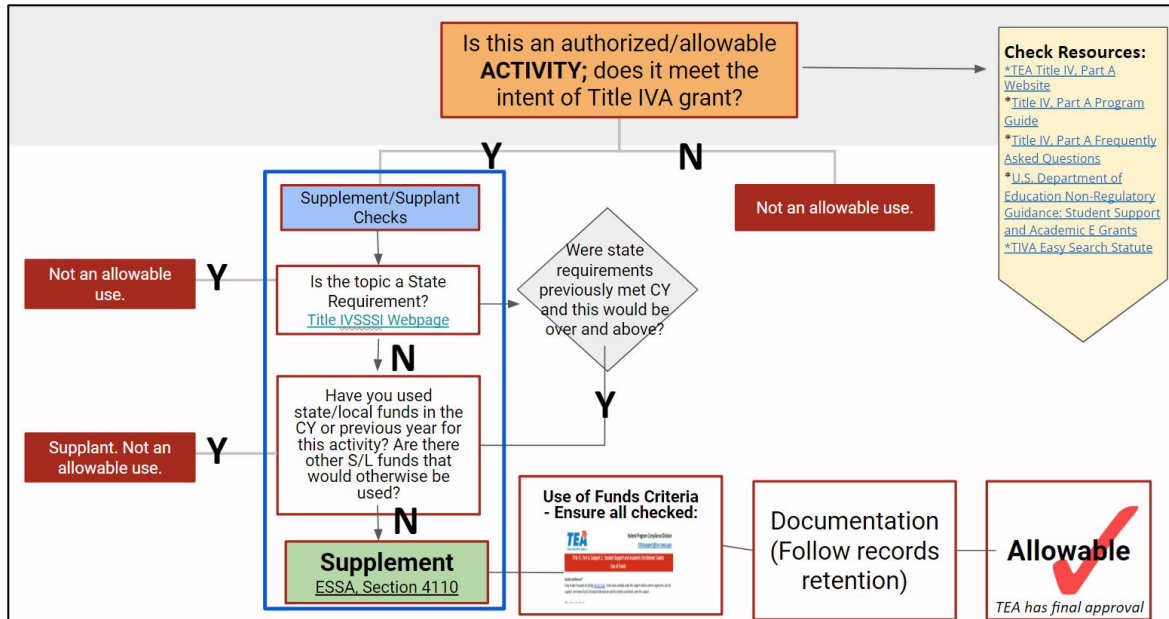
Scenario 2...

May Title IV, Part A funds be used to support training sessions for staff in bleeding control stations?





Funding Question Tool



Today's Resources

1. [TIVA SSSI website](#)
2. [TEA Website](#)



If you have questions about Title IVA Funds

LaNetra Guess

Title IV, Part A, Program Director

PNP Ombudsman

LaNetra.Guess@tea.texas.gov

(512) 463-6939

Federal Program Compliance

Division

ESSASupport@TEA.Texas.gov

512-463-9499



If you have questions about Supplement not Supplant

Vivian Smyrl

Texas Education Agency

Vivian.Smyrl@TEA.Texas.gov

512-936-9216

Federal Program Compliance

Division

ESSASupport@TEA.Texas.gov

512-463-9499



Title IV, Part A School Safety State Initiative



Rod Pruitt, ESC 14

Title IV, Part A School
Safety State Initiative
Coordinator

rpruitt@esc14.net

325-675-8646



Nancy T. Galle, ESC 14

Title IV, Part A School
Safety State Initiative
Project Manager/
Consultant

ngalle@esc14.net

325-675-7007



TEA Title IV, Part A Resources

- [Title IV, Part A, Subpart 1 Program Guide](#)
- Texas Education Agency [Supplement, Not Supplant Handbook Handbook](#), version 4.0, revised Sept 2019
- [Title IV, Part A Use of Funds Criteria](#)
- [TEA Title IV, Part A Frequently Asked Questions](#)
- [ESSA Consolidated Plan Application Program Guidelines](#)
- [Program-Specific ESSA Provisions and Assurances](#)
- [Collaborative Comprehensive Needs Assessment \(CCNA\) Toolkit](#)



Definitions

Is the expenditure:

- **Reasonable:** consistent with prudent business practice and comparable current market value
- **Necessary:** required to carry out the intent and purpose of the Title IV, Part A program; and
- **Allocable:** chargeable or assignable in accordance with relative benefits received.



Unallowable Use of Funds

Title IV, Part A Statute General Provisions

- Section 4001(b)
 - Medical services, drug treatment, or rehabilitation not integrated through Title IV, Part A student supports, referral to treatment, etc.,
- Section 4001(c)
 - Prescriptions for controlled substances

ESSA Statute, Part F, Subpart 2: Uniform Provisions

- Section 8526
 - Construction, renovation, or repair

TEA Budgeting Cost Guidance Handbook



USDE Resources

- [ESSA Title IV, Part A Statute](#)
- [U.S. Department of Education \(USDE\) Non -Regulatory Informational Document, June 2019](#)
- [National Center on Safe Supportive Learning Environments: ESSA Title IV, Part A](#)