





# Best Practices for Using Title IV, Part A Funds under ESSA to Support Private Nonprofit (PNP) School Needs

# **Title IV, Part A Requirements**

### Section 8501(a)(1) of the ESEA, as amended by the Every Student Succeeds Act (ESSA), requires an LEA:

- a. after timely and meaningful consultation with appropriate private school officials, to provide eligible private school children instructional services (including evaluations to determine the progress being made in meeting students' academic needs); and
- b. ensure that teachers and families of participating private school children participate, on an equitable basis, in services and activities.

## Title IV, Part A Intent and Purpose

Title IV, Part A, Subpart 1, Student Support and Academic Enrichment grants are designed to improve the academic achievement of all students by increasing the capacity of LEAs, schools, and communities to:

- 1. provide all students with access to a well-rounded education;
- 2. improve school conditions for student learning; and
- 3. improve the use of technology in order to enhance academic outcomes and digital literacy of students.

#### **Program Content Areas**

Per the Title IV, Part A, Subpart 1, statute there are three program content areas: well-rounded education, safe and healthy students, and effective use of technology. All three content areas contain program requirements that PNPs may receive services for from their partner LEA. The Title IV, Part A, statute specifically authorized the following types of activities in each of the three program content areas. Programs and activities that support the purpose and intent of Title IV, Part A may include:

## **Well-Rounded Education**

- 1. College and career guidance and counseling programs.
- **2.** Programs and activities that use music and the arts as tools to support student success through the promotion of constructive student engagement, problem solving, and conflict resolution.
- **3.** Programming and activities to improve instruction and student engagement in science, technology, engineering, and mathematics (STEM) subject areas, including computer science.
- **4.** Efforts to raise student academic achievement through accelerated learning programs.

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- **5.** Activities to promote the development, implementation, and strengthening of programs to teach traditional U.S. history, civics, economics, geography, or government education.
- **6.** Instruction, programs, or activities in languages other than English or environmental education.
- 7. Programs and activities that promote volunteerism and community involvement.
- **8.** Programs and activities that support educational programs that integrate multiple disciplines, such as programs that combine arts and mathematics.
- **9.** Other activities and programs to support student access to, and success in, a variety of well-rounded education experiences.

#### **Safe and Healthy Students**

- 1. Evidence-based drug and violence prevention activities and programs.
- 2. School-based mental health services.
- **3.** Programs or activities that integrate health and safety practices into school or athletic programs, support a healthy, active lifestyle, prevent bullying and harassment, improve instructional practices for developing relationship-building, provide mentoring and school counseling to all students, improve school dropout, and establish learning environments that are essential for school readiness and academic success.
- **4.** High-quality training for school personnel.
- **5.** Child sexual abuse awareness and prevention programs or activities.
- **6.** Designing and implementing a locally-tailored plan to reduce exclusionary discipline practices in elementary and secondary schools.
- 7. Implementation of school-wide positive behavioral interventions and supports.

## **Effective Use of Technology\***

- **1.** Providing educators, school leaders, and administrators with the professional learning tools, content, and resources.
- **2.** Developing or using effective or innovative strategies for the delivery of specialized or rigorous academic courses and curricula through the use of technology.
- **3.** Carrying out blended learning projects, which must include planning activities or ongoing professional development designed to support the implementation and academic success of the project aimed at teachers, principals, other school leaders or personnel.
- **4.** Providing professional development in the use of technology to enable teachers and instructional leaders to increase student achievement in STEM subjects including computer science.
- **5.** Providing students in rural, remote, and underserved areas with the resources to take advantage of high-quality digital learning experiences, digital resources, and access to online courses taught by effective educators.

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## **Overarching Best Practices for All Programs**

- Provide continuous support and collaboration between LEA and PNP.
- Coordinate with other Title programs to meet the needs of eligible students.
- Assist in the development of a needs assessment to identify and prioritize areas for professional development.
- Provide collaborative opportunities for PNP principals to share strategies and best practices and to coordinate the costs of contracted professional development.

## **Questions for Consideration of Allowability**

Each PNP must be able to respond appropriately to and maintain documentation for each of the following questions to determine whether and expenditure would be allowable:

- 1. How is the expenditure reasonable and necessary to carry out the intent and purpose of the program?
- 2. What need, as identified in the comprehensive needs assessment, does the expenditure address? Explain how the expenditure addresses the need.
- 3. How will the expenditure be evaluated to measure a positive impact on studentachievement?
- 4. How is the expenditure supplemental to other non-federal programs?

# **Technology Purchases\***

- USDE has advised TEA that they do not recommend that federal funds are used to purchase electronic devices. However, USDE is re-evaluating their original guidance that they previously provided to TEA after receiving concerns from private schools.
- TEA will issue guidance once USDE notifies us of their position.
- If an LEA provides technology as part of equitable services, it must document strong internal controls are in place in the district and private school to ensure the use of any technology is secular, neutral, and nonideological. Federal auditors and monitors will look for these internal controls.

For more details on programs and activities that support the intent and purpose of Title IV, Part A, please see the Every Student Succeeds Act, Sections 4107, 4108, and 4109 and the *Non-Regulatory Guidance: Student Support and Academic Enrichment Grant* (USDE, 2016), pages 18 - 47.

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