

Title IV, Part A, Subpart 1: Student Support and Academic Enrichment Frequently Asked Questions

This document provides the answers to Title IV, Part A, Subpart 1 related questions received by the Division during the month(s) noted below. You can also navigate through the document using the Bookmarks in your PDF viewer.

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

October and November 2020

Questions and responses are organized by the following topic areas for October and November 2020.

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- [Private Nonprofit \(PNP\) Equitable Services](#)
- [Comprehensive Needs Assessment \(CNA\) and Documentation](#)
- [Flexibility, Transferability, Waivers, and Carryover](#)
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Use of Funds

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

A1: An LEA should ensure Title IV, Part A programs and activities meet the following requirements:

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)]

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3. 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)];
 - The planning process meets the requirements for continued consultation of stakeholders and coordination [ESSA, Sections 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;
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(2)(D)(D)(E) –
 - Not use less than 20% of funds to support ***Well-Rounded Education Opportunities***
 - Not use less than 20% of funds to support ***Safe and Healthy Students***
 - Use portion of funds to support the ***Effective Use of Technology***;
7. No more than 15% for purchasing technology infrastructure [ESSA, Section 4109(b)]
 - Technology infrastructure (devices, equipment, and software applications to address readiness shortfalls) [ESSA, Section 4109(2)(B)]; and
8. In addition, the district would need an evaluation measuring the effectiveness of the activity which supports Title IV, Part A program objectives and intended outcomes. [Section 4106(3)(1)(E)]

Q2: May an LEA use Title IV, Part A funds to purchase bus security cameras?

A2: Yes, if the LEA has supporting documentation that bus security cameras meet all requirements listed in the *#Q1 Use of Funds* section. In addition, an LEA with an allocation of at least \$30,000 must provide activities in all 3 content areas.

Q3: May an LEA use Title IV, Part A funds to purchase a phone/software threat machine that interprets electronic threats to and from students?

A3: No. A phone/software threat machine does not meet the requirement of a ‘*reasonable and necessary*’ Title IV, Part A purchase. – *USDE Response*

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Q4: Our district has had issues with bomb threats and anonymous calls regarding weapons on campuses. We would like to purchase a service that would identify where calls are coming from. May we use Title IV, Part A funds for this service?

A4: No. A phone identification service to track calls is not a reasonable and necessary use of Title IV, Part A funds. – *USDE Response*

Q5: May an LEA expand or improve access to elementary students for a program that is currently being offered at the high school level? We have an elementary school that would like to expand a music program however funding for the program is very limited.

A5: Yes. Title IV, Part A funds may only be used to expand or create new music/art programs and meet all requirements listed in the *#Q1 Use of Funds* section. In addition, an LEA with an allocation of at least \$30,000, must provide activities in all three content areas.

Q6: May an LEA use Title IV, Part A funds to provide professional development opportunities for staff?

A6: Yes, if the Title IV, Part A *Comprehensive Needs Assessment* (CNA) and data support the specified professional development opportunities and meet all listed requirements in the *#Q1 Use of Funds* section. In addition, an LEA with an allocation of at least \$30,000, must provide activities in all three content areas.

Q7: Would the use of Title IV, Part A funds for implementation of a drug testing program be allowable if all other requirements are satisfied?

A7: Yes, if the Title IV, Part A *Comprehensive Needs Assessment* (CNA) and data support a drug testing program and meet all listed requirements in the *#Q1 Use of Funds* section. In addition, an LEA with an allocation of at least \$30,000, must provide activities in all three content areas.

Q8: May an LEA use Title IV, Part A funds to support a student's advanced placement (AP) exams?

A8: Yes, Title IV, Part A funds may be used as a reimbursement for *low-income* students to cover all or part of the AP examination costs/fees. [ESSA, Section 4107(a)(3)(D)]

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Q9: An LEA is tracking an alarming number of vaping incidents in their middle and high schools. It was identified as a need and is in the campus improvement plan. May the LEA use Title IV, Part A funds to purchase vaping sensors for those hot spot campus areas?

A9: Yes. Districts may utilize Title IV, Part A funds for vape detectors, vape prevention tools, vape education programs and related staff development under ESSA, Section 4108 - "Activities to Support Safe and Healthy Students –

- ESSA, Section 4108(5)(A) "...drug and violence prevention activities that programs that are evidence-based -
 - Section 4108(5)(A)(i) programs to educate students against the use of alcohol, tobacco, marijuana, smokeless tobacco products, and electronic cigarettes
- ESSA, Section 4108(5)(C)(ii) "...support a healthy, active lifestyle..."
- ESSA, Section 4108(5)(D)(vi) "high-quality training for school personnel, including specialized instructional support personnel, related to— "...drug abuse prevention..."

In addition, the LEA must meet all requirements in the *#Q1 Use of Funds* section. If the LEA has an allocation of at least \$30,000, it must provide activities in all three content areas.

Q10: Our district has a new identified and prioritized need for "Mobile Messaging Signs" for immediate school safety improvements. We are exploring the use of Title IV, Part A grant funds under the "Safe and Healthy Students" content area for purchasing the equipment. Would this be an allowable use of funds?

A10: No. Based on the information provided, use of Title IV, Part A funds for this purpose raises significant concerns about the "supplement, not supplant" requirement. Traffic control is a state/local issue and, while related to school safety, generally paid for with other state/local funds. Further, even if the presumption of supplanting could be overcome, the purchase does not appear to be reasonable and necessary for performance of the grant (i.e., of a type generally recognized as ordinary and necessary for operation of the grant) and allocable to the grant (i.e., chargeable to the grant award in proportion to the benefits received by the grant award as a result of the cost). – *USDE Response*

Q11: May Title IV, Part A funds support LEA staff virtual, practice, or active shooter drills?

A11: No. Title IV, Part A funds may not support any virtual, practice, or active shooter drills. The LEA may prorate training for instruction-led sessions which exclude weapons.

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Q12: May an LEA use Title IV, Part A funds to purchase a fingerprint scanner?

A12: No, this purchase would not be allowable. Based on the information provided, it appears that the primary use of the fingerprint scanner is for police-related activities. The scanner does not support the development of programs/activities in at least one of the three content areas in the Title IV, Part A program. In addition, the purchase does not appear to be reasonable and necessary for performance of the grant (i.e., it is of a type generally recognized as ordinary and necessary for operation of the grant) and allocable to the grant (i.e., it is chargeable to the grant award in proportion to the benefits received by the grant award as a result of the cost). – *USDE Response*

Q13: How does Title IV, Part A define a ‘school-based mental health services provider’?

A13: The term “school-based mental health services provider” includes a State-licensed or State-certified school counselor, school psychologist, school social worker, or other State-licensed or certified mental health professional qualified under State law to provide mental health services to children and adolescents. [ESSA, Title IV, Part A Section 4106(6)]

Q14: May an LEA use Title IV, Part A funds for portable microphone/headphones for teachers (because the students on the Zoom meeting cannot hear them when they move away from the camera)? Would the portable microphones/headphones be part of the 15% rule or would they be considered part of improving the integration of instruction using technology?

A14: USDE Response (12/15/2020):

- If a district decides to use funds under Title IV, Part A for costs related to computer devices and accessories (like microphones/headphones) or internet connectivity, etc., the district must be sure that the use of the funds is reasonable and necessary and does not violate other program requirements, such as the supplement not supplant requirement.
- If a district is providing free public education virtually (i.e., providing its core curriculum through online instruction), it must also provide the basic tools necessary to access that instruction with State or local funds or CARES Act funds and other Federal funds in which such spending is allowable.
- If the portable microphone/headphones for teachers are necessary for virtual learning, then they would likely constitute a violation of the Title IV, Part A supplement not supplant requirement.
- However, Title IV, Part A funds may be used to enhance such virtual learning after such access is provided with other funds.

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- If the district determines that the microphones/headphones do not constitute a supplanting violation, then the microphones/headphones would constitute an allowable use of funds under 4109(a)(1), which is not subject to the 15% cap on technology infrastructure purchases.

Q15: May Title IV, Part A funds be used for the services of a school resource officer?

A15: Yes, if it meets all requirements listed in the *#Q1 Use of Funds* section.

Q16: One of our rural LEAs has asked about the allowability of adding an additional concrete pad to their playground to provide additional space to play basketball. Is this an allowable Title IV, Part A activity?

A16: No. The legislation expressly prohibits the use of funds [(section 8526(1))] for construction, renovation, or repair of any school facility. These funds may be used for minor remodeling and repair. Minor remodeling refers to minor alterations in a previously completed building. The term also includes the extension of utility lines, such as water or electricity, from points beyond the confines of the space in which the minor remodeling is undertaken but within the confines of the previously completed building. The term does not include building construction, structural alteration to buildings, building maintenance, or repairs. – USDE Response 12/2020.

Q17: A district is supporting a program for domestic and sexual abuse awareness and prevention. May an LEA use Title IV, Part A funds for promotional items (i.e., tee-shirts, wristbands, lanyards, notebooks, etc.) which support the specific program?

A17: No. Based on the information provided, the purchase appears to be unallowable. These items appear to fit in the category of “advertising and public relations,” which are generally not allowable per [2 CFR 200.421](#). One exception to the prohibition is costs that involve “program outreach and other specific purposes necessary to meet the requirements of the Federal award.” So, items that are purely about publicity and promotion of the organization would not be proper, but an item that was designed to let individuals that might be in need of the program services know about its existence might be allowable. – USDE Response

Private Nonprofit (PNP) Equitable Services

Q1: Can Title IV, Part A funds be used to pay for a private nonprofit’s (PNP’s) advanced placement testing proctor’s stipend or salary?

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A1: No. Stipends and/or salary for a PNP’s testing proctor does not meet any of the 3 purposes of Title IV, Part A for students: well-rounded education, safe and healthy students, or the effective use of technology.

Q2: Can Title IV, Part A funds be used to assist PNP students for dual credit tuition?

A2: Yes, it must meet all requirements listed in the *#Q1 Use of Funds* section. In addition, all Title IV, Part A funds used for PNP equitable services/materials/purchases must be neutral, secular, and nonideological. [ESSA, Section 4107(a)(3)(D)]

Q3: Can Title IV, Part A funds be used to pay for PNP student licenses for an online career inventory?

A3: Yes, it must meet all requirements listed in the *#Q1 Use of Funds* section. In addition, all Title IV, Part A funds used for PNP equitable services/materials/purchases must be neutral, secular, and nonideological. [ESSA, Section 4107(1)(3)(A)(i)]

Q4: May an LEA use Title IV, Part A funds for a PNP’s student group to attend a STEM competition?

A4: Yes, it must meet all requirements listed in the *#Q1 Use of Funds* section.

An LEA may use Title IV, Part A funds for a PNP’s programming and activities to improve instruction and student engagement in STEM subjects. STEM activities may include increasing access for groups of underrepresented students to high-quality courses and supporting participation in nonprofit competitions (e.g. robotics, math competitions, computer programming).

All Title IV, Part A funds used for PNP equitable services/materials/purchases must be neutral, secular, and nonideological. [ESSA, Section 4107(a)(3)(C)]

Q5: LEAs and ESCs have asked if a PNP may use Title I, Part A (eligible students), Title III, Part A (eligible students), and Title IV, Part A (all students) to purchase laptops/electronics? Hotspots are discussed elsewhere in the COVID-19 FAQ but not if an LEA may purchase hotspots for eligible PNP students. Updated May 28, 2020

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Q6: What is the LEA's responsibility to monitor programs and activities funded by Title IV, Part A in private non-profit schools?

A6: The LEA's responsibility is the same as with all funds subject to equitable services. – USDE Response, 12/2020.

Q7: Must the participating PNP schools receive Title I, Part A funds in order to participate with Title IV, Part A equitable services?

A7: No, the LEA must have received Title I, Part A funds to also generate Title IV, A funds. -USDE Response, 12/2020.

Comprehensive Needs Assessment (CNA) and Required Documentation

Q1: What are acceptable forms of documentation for attendee sign-in sheets?

A1: Given the increased use of virtual meeting environments during the 2019-2020 and 2020-2021 school years, participant rosters that include the meeting title, meeting date, and stakeholder names and roles would be acceptable substitutes for the more traditional sign-in sheets. This eliminates the need of a participant signature.

Q2: Is an evaluation measuring effectiveness required for all Title IV, Part A programs and activities?

A2: Yes. The LEA is required to keep documentation of an evaluation measuring the effectiveness of activities which support Title IV, Part A program objectives and intended outcomes.
[Section 4106(3)(1)(E)]

Q3: Who are the stakeholders that shall participate in the Title IV, Part A program development?

A3: A local educational agency shall develop its application through consultation with the following stakeholders:

- Parents
- teachers
- principals
- other school leaders
- specialized instructional support personnel
- students, community-based organizations
- local government representatives (which may include a local law enforcement agency,

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- local juvenile court
- local child welfare agency (or local public housing agency)
- Indian tribes or tribal organizations that may be located in the region served by the local educational agency (where applicable)
- charter school teachers, principals, and other school leaders (if such agency or consortium of such agencies supports charter schools)
- others with relevant and demonstrated expertise in programs and activities designed to meet the purpose of this subpart

Q4: How does the Title IV, Part A statute define ‘local government representatives’ who shall participate during consultation with the program development?

A4: Local government representatives are defined as local law enforcement agencies, local juvenile courts, local child welfare agencies, or local public housing agencies. [ESSA, Section 4106(c)(1)]

Flexibility, Transferability, Waivers, and Carryover

Q1: Has USDE provided any flexibility for Title IV, Part A funds?

A1: Yes. Per the [COVID-19 and Federal Grant Funds: Frequently Asked Questions](#), Flexibility and Waivers Section, Question 2.

TEA received approval from USDE on April 10, 2020, for the following waivers:

- ESSA, Title IV, Part A needs assessment requirement for SY 2019-2020. This waiver allows LEAs to address newly identified needs without the need to revise their needs assessment.
- ESSA, Title IV, Part A three content area spending set-aside requirements for SY 2019-2020 (including carryover from SY 2018-2019). This waiver allows LEAs to expend grant funds as needed.
- ESSA, Title IV, Part A limitation on technology infrastructure costs. This waives the 15% limitation and allows LEAs to expend grant funds as needed.
- ESSA definition of professional development for SY 2019-2020. This waiver ensures online or virtual training is allowable under ESSA grant funding.

TEA will implement these waivers for all subgrantees as long as the two assurances below are met by the subgrantees:

- Subgrantees ensure they will use funds under the respective ESSA programs in accordance with the provisions of all applicable statutes, regulations, program plans, and applications not subject to these approved waivers.

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- Subgrantees ensure they will work to mitigate any negative effects, if any, that may occur as a result of these approved waivers.

Q2: Does the Title IV, Part A limitation on technology infrastructure apply to COVID-19 related purchases of technology such as internet hot spots? If yes, can this requirement be waived?
Posted April 14, 2020

A2: Yes. The Title IV, Part A technology infrastructure limitation has been waived.

Per the [COVID-19 and Federal Grant Funds: Frequently Asked Questions](#), Flexibility and Waivers Section, Question 5.

Q3: Is the Title IV, Part A technology waiver and the waiver for the three areas of allocation extending into 2020-2021 or does this last only until the end of fiscal year 2020? Posted April 30, 2020

A3: As currently approved, the waivers from USDE are for SY 2019-2020 Title IV, Part A funding only. Per the [COVID-19 and Federal Grant Funds: Frequently Asked Questions](#), Flexibility and Waivers Section, Question 7.

Q4: Has USDE provided any waivers on the 3 content areas for Title IV, Part A funds?

A4: Yes. Per the [COVID-19 and Federal Grant Funds: Frequently Asked Questions](#), Flexibility and Waivers Section, Question 6.

Q5: If a private school receives Title IV, Part A funds from an LEA one year and has money left over but either does not want to participate or shuts down, may the remaining funds go back go into the public schools in Title I, Part A?

A5: If the LEA provided equitable services for students in the private school in a particular year and there are carryover funds, those funds are considered additional funds for services for both public and private school students in the subsequent year. The funds would be used, along with any other carryover funds, for both public and private school students on an equitable basis. – USDE Response, 12/2020.

Q6: If a district transfers some or all Title IV, Part A funds to another Title program, when the “transferred out” funds are spent, is it considered Title IV, Part A funds spent?

A6: No. Funds transferred from the Title IV, Part A account lose their program identity and take on the identity of the program to which they are transferred. – USDE Response

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Q7: If an LEA receives an allocation that is greater than \$30,000 and then transfers some of the funds out of Title IV, Part A into another Title program--so their available funds total drops below \$30,000--does the LEA need to meet the 20%/20%/portion requirements for the remaining Title IV, Part A funds?

A7: No, the LEA would not have to comply with the percentage spending requirements under these circumstances. In other words, it is based on the total amount of Title IV, Part A funds after the transfer. So, if an LEA transfers funds in and the Title IV, Part A allocation is over \$30,000 it would need to comply with the content area spending requirements. – USDE Response

State Requirements

Q1: Is there a list of Texas State requirements related to Title IV, Part A programs and activities for an LEA to avoid selecting which would be deemed supplanting?

A1: Yes. LEAs may search the [Region 14 Title IV, Part A School Safety State Initiative](#) webpage for state training requirements.

Q2: Can Title IV, Part A funds be used to pay for a defibrillator?

A2: No. A defibrillator is a state-mandated requirement for all charter schools and districts. Therefore, using Title IV, Part A funds for this state requirement would be supplanting.

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 (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 #Q1 Use of Funds section's response, those activities may be allowable.

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.

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Q5: Is there a website with resources which may assist LEAs in supporting students' mental and behavior health?

A5: Yes. TEA's [Mental Health and Behavioral Health](#) webpage assists school personnel with resources for supporting student mental health.

December 2020/January 2021

Questions and responses are organized by the following topic areas for December 2020 and January 2021.

- [Use of Funds](#)
- [Well-Rounded Educational Opportunities](#)
- [Flexibility, Transferability, Waivers, and Carryover](#)

Use of Funds

Q1: Are educational field trips an allowable activity with Title IV, Part A funds?

A1: Yes, such an activity is allowable if it meets the following conditions:

- is identified in the Comprehensive Needs Assessment (CNA);
- is included in the Campus Improvement Plan (CIP);
- is allocable, reasonable, and necessary to carry out the intent and purpose of the grant program;
- includes an instructional activity or activities that cannot be conducted through interactive activities in the classroom or on campus;
- will result in a positive impact on student achievement;
- includes instruction that addresses the Texas Essential Knowledge and Skills (TEKS); and
- includes an evaluation of the field trip that measures the impact on student achievement.

If an LEA plans on using grant funds for field trips, it will be required to complete the appropriate TEA justification form(s) and retain the documentation at the local level. LEA must keep and maintain this form so that it may be provided to an independent auditor or to TEA monitors if selected for a review.

– TEA, Title IV, Part A Program Guide

Q2: May an LEA use Title IV, Part A funds for an accelerated learning program for struggling students?

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- A2: Yes. Efforts to raise student academic achievement through accelerated learning programs is an allowable activity with Title IV, Part A funds.
- Q3: If an LEA has met the state requirement of having at least one automated external defibrillator (AED) per campus with state and/or local funds, may Title IV, Part A purchase additional AEDs?**
- A3: Yes, if state and/or local funds were used to meet the minimum requirement, Title IV, Part A funds may be used for additional AEDs on campus.
- Q4: May an LEA use Title IV, Part A funds to pay for *Crisis Prevention Intervention* curriculum (CPI) materials? CPI is a nonviolent crisis intervention training designed to teach staff best practices for de-escalating students in crisis, managing difficult situations, and disruptive student behaviors.**
- A4: Yes, CPI would be an allowable Title IV, Part A activity in the content area of *Safe and Healthy Students*.

Well-Rounded Educational Opportunities

Q1: How may an LEA use Title IV, Part A to support activities in the well-rounded content area?

A1: An LEA may use Title IV, Part A funds to support well-rounded activities, such as:

- Science, technology, engineering, and mathematics (STEM)
- Music and arts (i.e., dance, theater, media/visual arts, etc.,)
- Foreign language instruction
- Accelerated learning programs
 - Dual or concurrent enrollment programs
 - Early college high school programs
- Civics instruction
- College and career counseling (programs and services)
- Social emotional learning (SEL)
- Environmental education

Q2: What are examples of STEM activities?

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A2: A few examples of Title IV, Part A STEM activities are:

- Increasing access for groups of underrepresented students to high-quality courses
- Supporting participation in nonprofit competitions (i.e., robotics, computer programming, etc.,)
- Providing hands-on learning
- Integrating other academic subjects into STEM curricula
- Integration and learning through exploration, problem solving, and other real-world contexts

Q3: May an LEA purchase an online reading program focusing on foundation reading skills and designed to accelerate literacy be an allowable expenditure under Title IV, Part A?

A3: Yes. The Title IV, Part A Guidance states, “a well-rounded education promotes a diverse set of learning experiences that engages students across a variety of courses, activities, and programs in subjects such as English, *reading/language arts*, writing, science, technology, engineering, mathematics, foreign languages, civics and government, economics, arts, history, geography, computer science, music, career and technical education, health, and physical education.”

Flexibility, Transferability, Waivers, and Carryover

Q1: If a PNP school has Title IV, Part A equitable services remaining and declines continued participation or closes, what happens with the remaining funds for services?

A1: The remaining Title IV, Part A funds for equitable services are considered additional funds for services in both public and participating PNP schools the subsequent year on an equitable basis.

February 2021

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Use of Funds

Q1: May Title IV, Part A funds pay for district staff to attend active shooter training sessions?

A1: Yes. Title IV, Part A funds may pay for the training portion that does not include the use of firearms and ammunition. -*USDE Response*

Q2: May Title IV, Part A funds be used for district staff firearms and ammunition as part of a school safety program?

A2: No. Title IV, Part A funds may not pay for costs, either direct or indirect, related to firearms and ammunition. -*USDE Response*

Q3: May Title IV, Part A funds be used to support active shooter drills?

A3: No. Title IV, Part A funds may not support any virtual, practice, or active shooter drills. The LEA may prorate training for the portions not using a weapon (i.e., instructor-led sessions).

Q4: May Title IV, Part A funds be used for re-keying and/or replacing school building locks?

A4: Yes. -*USDE Response*

Private Nonprofit (PNP) Equitable Services

Q1: Districts and ESCs have asked if a PNP may use Title IV, Part A (all students) to purchase laptops/electronics. Is this allowable?

A1: Yes. Under the current pandemic circumstances, in addition to the ESSER equitable services ESSA equitable services, funds may be used to purchase technology for instructional purposes. The grant funds may only be used to serve eligible students at the private school, and all technology must be maintained in the control of the district, on the district's inventory, and monitored for only secular, neutral, and non-ideological uses. – *TEA CARES Act Equitable Services FAQ, Section: Allowable and Unallowable Uses of Funds for PNP Equitable Services (Page 18, FAQ # 3)*

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March 2021

Questions and responses are organized by the following topic areas for March 2021.

- [Well-Rounded Educational Opportunities](#)
- [Safe and Healthy Students](#)
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Well-Rounded Educational Opportunities

Q1: May Title IV, Part A funds pay for SAT and ACT exam fees?

A1: Yes, SAT and ACT exam fees are allowable under the well-rounded education content area.

An LEA may use funds for college and career counseling programs and services. These programs and services are, generally, designed to help students make informed and better educational and career choices as they develop personal, social, educational, and career skills. Programs often offer students information starting in middle school about how to prepare for college, including the importance of choosing rigorous high school course offerings, how to choose from among career options, how to enroll in and receive federal financial aid through the FAFSA, and how to pursue academic and occupational training needed to succeed in the workplace. To help prepare students to transition to college, assistance is provided on identifying postsecondary opportunities that are associated with students' interests, applying for college admissions and obtaining financial aid, and preparing for college aptitude tests (e.g. SAT and ACT). - *College and career counseling (ESEA section 4107(a)(3)(A))*.

-*USDE Non-Regulatory Guidance Student Support and Academic Achievement (October 2016)*

Q2: May Title IV, Part A funds be used to purchase cardiopulmonary resuscitation (CPR) manikins for student training purposes?

A2: Yes. Student CPR training programs, supplies, and related materials would be allowable under the well-rounded education content area.

Safe and Healthy Students

Q1: What are some examples of allowable activities under the safe and healthy students content area?

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A1: A few examples of student physical and mental health activities that are allowable under the safe and healthy student content area (*ESSA, Section 4108*) are:

- Drug and violence prevention;
- School-based health and mental health services;
- Healthy, active lifestyle, and nutritional education;
- Physical activities;
- Trauma-informed classroom management;
- Chronic disease management;
- Mentoring and school counseling; and
- Schoolwide positive behavioral interventions and support (PBIS).

Supplement Not Supplant

Q1: Is it permissible for an LEA to use Title IV, Part A funds to pay salaries this year if it used local funds last year?

A1: No. LEAs should be mindful that Title IV, Part A program funds may be used only to supplement, and not supplant, non-Federal funds that would otherwise be available for activities authorized under the SSAE program (*ESEA section 4110*). This means that, in general, LEAs may not use Title IV, Part A program funds for the cost of activities in the three program content areas – well-rounded education, safe and healthy students, and technology – if the cost of those activities would have otherwise been paid with State or local funds in the absence of the Title IV, Part A program funds. -*USDE Non-Regulatory Guidance Student Support and Academic Achievement (October 2016)*

April 2021

Questions and responses are organized by the following topic areas for April 2021.

- [Shared Services Agreement](#)

Shared Services Agreement

Q1: When will the project district officially become part of the SSA? Will it be the date I submit the application or the date of the NOGA?

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A1: The SSA fiscal agent is responsible for completing and submitting the grant application. The Grant Start Date or date of submission, whichever is later, is the start date of the NOGA and subsequently the SSA for the grant. However, the SSA fiscal agent must have a written agreement with each member LEA that addresses the start and end dates of the shared services agreement.

Q2: Also, can they continue to expend their 19-20 and 20-21 monies through the end of the extension? Or does that money roll to the SSA? Or does it go back to TEA?

A2: The SSA fiscal agent can expend funds throughout the grant period. For the 2019-2020 ESSA Consolidated grant, the last day to obligate funds is 9/30/21. Final expenditure reports are due 11/1/21. Normally, if there are funds remaining at the end of a grant period, the SSA will receive the funds through carryover in the following year, *if it is available*. For the 2019-2020 ESSA Consolidated grant, carryover *is not available* due to the extension. As a result of the extension, the LEA already received the full 27-months availability of funds they would have received if there had been carryover.

Remaining funds from the 2020-2021 ESSA Consolidated grant will carry over into the 2021-2022 grant. If a member LEA leaves the SSA in 2021-2022, the funds do not follow the member LEA, they stay with the SSA unless the written shared services agreement between the SSA fiscal agent and the member LEA specifies that the member LEA keeps its carryover upon leaving the SSA. SSAs must notify TEA if a member LEA leaving the SSA will receive any of the carryover funds.

Q3: If we have an SSA that is wanting to go non-Project for 2021-2022, what would happen to their 20-21 Grant Funding?

A3: Any carryover remaining from an SSA that no longer wants to apply for the funds would go to the member LEAs. The SSA would need to notify TEA and specify the amount that would go to each member LEA. This issue should be addressed in the written agreement between the SSA fiscal agent and the member LEAs.

May 2021/June 2021

Questions and responses are organized by the following topic areas for May/June 2021.

- [Evaluation](#)
- [Mental Health](#)
- [State Requirements](#)

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Evaluation

Q1: Is an evaluation of the Title IV program required if private nonprofit (PNP) schools participate in any Title IV, Part A equitable services?

A1: Yes. The evaluation of services and how the results will be used must be discussed during ongoing consultation meetings per the [ESEA, Participation by Private Schools and Teachers, Part F, Subpart 1, Section 8501\(c\)\(1\)\(D\)](#) and [ESEA, Title IV, Part A, Section 4106 \(e\)\(1\)\(E\)](#).

Mental Health

Q1: How does Title IV, Part A define a ‘school-based mental health services provider?’

A1: The term “school-based mental health services provider” includes a State-licensed or State-certified school counselor, school psychologist, school social worker, or other State-licensed or certified mental health professional qualified under State law to provide mental health services to children and adolescents.

Q2: Is there a TEA website with resources which may assist LEAs in supporting students’ mental and behavior health?

A2: Yes. The TEA’s [Mental Health and Behavioral Health](#) webpage assists school personnel with resources for supporting student mental health.

Q3: Are Title IV, Part A funds allowable to cover the purchase of curriculum, programs, and training for mental health?

A3: Yes. LEAs may purchase curriculum for evidence-based programs and training to support the activities and objectives listed in FAQ #1 to support school mental health. Costs for any supplemental, additional, or advanced training plus any curriculum materials, staffing, or coaching that the LEA determines is reasonable and necessary to implement the related program activities in a school may be allocated to 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

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 - 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 systems level – an evidence-based strategy for schools.

Q4: Are Title IV, Part A funds allowable for staff salaries to coordinate and provide mental health services and supports?

A4: Yes. Examples of positions that may be funded include:

- Licensed mental health professionals, including: licensed clinical social workers (LCSW) and licensed master social workers (LMSW) with supervision to complete LCSW licensure, licensed professional counselors (LPC) or licensed professional counselor interns (LPC-i) with supervision to complete licensure, advance practice psychiatric nurses, PhD psychologists, licensed marriage and family therapists (LMFT).
- Social workers: licensed master social workers and licensed bachelor social workers
- Parent Engagement Specialists
- Professional School Counselors
- Case Managers or Service Coordinators or Resource Coordinators: any of the mental health positions or other specialized instructional support personnel who are well trained in school mental health and who the LEA determines can effectively serve in these roles.
- Telemedicine and tele-mental health or tele-counseling services provided remotely to students at school or at home.
- Contracted or partnership agreements to provide school mental health services through community providers such as local mental health authorities (LMHAs), clinics, hospitals, medical schools, psychiatrists, private-practice behavioral health clinicians, nonprofit organizations, and other prevention specialists for services and supports that are aligned with school needs and coordinated through the MTSS. Examples of these contracted or partnership agreements include: services delivered at a school through a memorandum of

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- understanding, a purchased services contract, a shared funding strategy for a non-physician mental health professional, a licensed specialist in school psychology, or a social worker to provide services in a school.

State Requirements

Q1. Is there a list of Texas State requirements related to Title IV, Part A programs and activities for an LEA to avoid selecting which would be deemed supplanting?

A1. Yes. LEAs may consult the [Region 14 Title IV, Part A School Safety State Initiative](#) webpage for state training requirements.