

## **Title IV Part A Program Overview**

### **Purpose of Title IVA**

Title IV Part A is intended to improve student academic achievement by increasing the capacity of states, local educational agencies (LEAs), schools, and local communities to:

- provide all students with access to a well-rounded education,
- improve school conditions for student learning, and
- improve the use of technology to increase academic achievement and digital literacy of all students

### **Allocations to LEAs (ESEA §4105(a))**

Title IVA funds are allocated to LEAs in proportion to their prior-year Title IA allocations. LEAs receive a minimum of \$10,000. LEAs receiving more than \$30,000 in Title IVA funds must conduct a comprehensive needs assessment at least once every three years and use the results to justify spending requests in all three program content areas.

### **Application Requirements**

#### **Comprehensive Needs Assessment (ESEA §4106(d))**

LEAs that receive \$30,000 or more in Title IVA funds must conduct a comprehensive needs assessment at least once every three years to examine the need for improvement in the three content areas of Title IV:

- access to a well-rounded education for all students
- school conditions for student learning
- access to personalized learning experiences supported by technology

Vermont's Consolidated Federal Programs (CFP) application requires all LEAs to submit a Data Inventory to support reasonableness and necessity of CFP-funded strategies. The Data Inventory may serve as evidence of the LEA's Title IVA comprehensive needs assessment, provided it addresses all three of the Title IVA content areas.

#### **Stakeholder Engagement (ESEA §4106(c))**

LEAs must engage in consultation with a variety of stakeholders during development of the application. This consultation must be on-going and continuous in order to improve the identified activities supported with Title IVA funds and to coordinate implementation with other related activities conducted in the community.

Required stakeholders include, but are not limited to:

- Parents
- Students
- Teachers

- Principals and school leaders
- Specialized instructional support personnel
- Local government representatives
- Indian tribes or tribal organizations, when applicable
- Community-based organizations
- Others with relevant and demonstrated expertise

In addition to these required stakeholders, LEAs may consider involving health providers, police, social workers, librarians, technology experts, service providers, faith-based community members, and members of the business community in the development of its application.

### **Prioritization of Schools (ESEA §4106(e)(2)(A))**

As part of the application process, LEAs must identify which schools will participate in Title IVA-funded programming. LEAs must prioritize the distribution of Title IVA funds to schools based on one or more of the following factors:

- Schools that have the greatest need (as determined by the LEA);
- Schools that have the highest percentages or numbers of low-income children;
- Schools identified for comprehensive support and improvement under Title I;
- Schools implementing targeted (equity) support and improvement plans under Title I;
- or
- Schools identified as a persistently dangerous public elementary or secondary school

Schools identified as having the greatest need will be determined by the LEA; this will likely be driven by the data and needs identified in the comprehensive needs assessment.

### **Intended Outcomes and Evaluation (ESEA §4106(e)(1)(E))**

Each Title IVA application submitted by an LEA must include the program objectives and intended outcomes for Title IVA-funded activities, as well as a description of how the LEA will periodically evaluate the effectiveness of activities based on those objectives and outcomes.

The development of program objectives and outcomes should be driven by the LEA's assessed needs identified in the Data Inventory. The LEA may determine whether objectives and outcomes are established for each activity, for a group of activities, or for the application as a whole; accordingly, the LEA may determine whether evaluation of strategies is done for single investments, groups of strategies, or the application as a whole.

In Vermont's CFP application, all investments are required to contain a purpose statement (please see CFP guidance on [Writing Approvable Investments](#) for additional information) which should be clearly aligned to a data-supported need identified in the Data Inventory. This requirement captures the intended outcomes for Title IVA-funded activities; LEAs must then provide a description of how activities will be evaluated for effectiveness on the "Evaluating Effectiveness" tab in the Title IVA application.

### **Distribution Requirements (ESEA §4106(e)(2)(C-E))**

LEAs receiving at least \$30,000 in Title IVA funds must adhere to all the following requirements regarding distribution of funds across the three content areas:

- Use at least 20% of Title IVA funds toward well-rounded educational opportunities;
- Use at least 20% of Title IVA funds toward safe and healthy students; **and**
- Use a portion of Title IVA funds (no more than 60%) toward effective use of technology

LEAs receiving less than \$30,000 must meet at least one of the following requirements regarding distribution of funds across the three content areas:

- Use at least 20% of Title IVA funds toward well-rounded educational opportunities; or
- Use at least 20% of Title IVA funds toward safe and healthy students; **or**
- Use a portion of Title IVA funds toward effective use of technology

Once minimum budgeting requirements have been met, LEAs may budget the remaining portion of funds in any of the three content areas.

The Vermont Title IVA program requires that LEAs meet minimum budgeting requirements for CFP application approval; however, it is expected that LEAs are meeting distribution requirements in their expenditures as well.

### **Special Rule: 15% spending cap**

Under the effective use of technology content area, there is a special rule regarding infrastructure costs. LEAs may not budget more than 15% of the total funding in this content area toward infrastructure costs, which includes devices, equipment, software applications, platforms, digital instructional resources, and/or other one-time IT purchases (§4109(a)(2)(B) and §4109(a)(4)(A)).

The 15% spending cap on infrastructure applies only to the effective use of technology content area; there is no special rule on infrastructure spending under the well-rounded or safe and healthy students content areas.

### **Supplement Not Supplant (ESEA §4110)**

Title IVA funds may be used only to supplement, and not supplant, non-Federal funds that would otherwise be available for activities authorized under Title IVA.

There are two presumptions of supplanting under Title IVA:

- An activity paid for with federal funds that is required by federal, state, or local law
- An activity paid for with federal funds that was previously paid for with state or local funds in the prior year

LEAs may not use Title IVA funds for the cost of activities in the three Title IVA content areas – well-rounded education, safe and healthy students, and effective use of technology – if the cost of those activities would have otherwise been paid with state or local funds in the absence of the Title IVA funds.

### **Equitable Services to Independent Schools (ESEA §8501)**

LEAs must consult with independent schools to identify the needs of eligible independent school students and teachers. This process is different from the consultation related to the development of the LEA's application described above.

For additional information on equitable services to independent schools requirements, please see the [Equitable Services to Independent Schools](#) guidance.

### **Formation of LEA Consortia**

LEAs may consider applying for funds in consortium to implement programs across districts. Working together, LEAs may be able to more efficiently deliver services that enable them to serve more students at lower cost and reduce administrative overhead.

If LEAs wish to apply as a consortium, they must include an Act 267 (LEA-LEA) Agreement in the CFP application.

### **Carryover**

There is no carryover limit for Title IVA; however, it is highly encouraged that LEAs obligate funds in the year they were awarded.

## **Data Reporting**

### **Consolidated State Performance Report**

The Consolidated State Performance Report (CSPR) is the required annual reporting tool for the Title IVA program. The CSPR requires the following data for Title IVA:

- **Funds spent under Title IVA:** amount of funds spent by LEAs in each of the three content areas
- **LEAs that spent funds under Title IVA:** the number of LEAs that spent funds in each of the three content areas
- **LEA funds transfers:** The total number of LEAs transferring funds to and/or from Title IVA

The CSPR requests only the amount of funds spent (i.e., expended) during the 12-month reporting period. LEAs should refer to their approved CFP application to inform which content areas funds will be counted in for the purposes of CSPR reporting.

The State Title IV Director will reach out to LEAs for spending data for the previous school year in December each year.

### **Performance Reporting & Evaluation (4106(a)(2), 4106(e)(1)(E))**

Each State that receives Title IVA funds must publicly report on how these funds are spent by LEAs to meet the distribution requirements and the degree to which LEAs have made progress toward meeting the program objectives and intended outcomes described in the LEA's application.

The State Title IV Director will reach out to LEAs prior to the end of each fiscal year to gather this information; once compiled, it is posted to the AOE's [Title IVA webpage](#).

## Transferability & Consolidating Funds

### Transferability

Title IV Part A funds may be transferred into or out of other Title programs. Please note the restrictions outlined below.

Title IVA funds may be transferred **into** the following programs:

- Title IA
- Title IIA
- Title IIIA
- RLIS programs

The only funds that can be transferred into Title IVA are Title IIA funds.

LEAs wishing to transfer funds must engage in consultation with independent schools, provide an updated Data Inventory to support the need for the transfer, and provide notification to the VT-AOE at least 30 days prior to making the transfer. Please see the [letter on funding transferability](#) for additional information.

### Fund Consolidation

**Schoolwide Program (SWP)** – a school operating a Title IA schoolwide program has the flexibility to consolidate funds from Title IA and other federal education programs to better address the needs of students in the school. By consolidating funds into a schoolwide program, a school can implement a plan to upgrade the entire educational program in the school. When funds are consolidated into a schoolwide program, those funds lose their individual identity, and the school may use funds to support any activity of the schoolwide program identified by the school’s needs assessment and articulated in its schoolwide plan.

If a school consolidates and uses funds from another federal education program in a schoolwide program, it must demonstrate that the schoolwide program meets the intent and purposes of each program whose funds are consolidated. Title IVA funds may be consolidated in a schoolwide program and do not have to be tracked for specific compliance with the requirements of Title IVA; however, the school would have to show that its schoolwide program meets the intent and purposes of Title IVA. In order to demonstrate this, LEAs must write at least one investment that meets the intent of Title IVA at each school where Title IVA funds have been consolidated into the schoolwide program.

*Example:* In the scenario below, Maple and Oak Schools operate Title IA Schoolwide Programs.

- Maple School has consolidated funds from Titles IA, IIA, and IVA into the schoolwide program. This school must have at least one investment that meets the intent of Title IA, at least one investment that meets the intent of Title IIA, and at least one investment that meets the intent of Title IVA.
- Oak School has consolidated funds from Titles IA and IIA; therefore, this school must have at least one investment that meets the intent of Title IA and at least one meeting the intent of Title IIA.

School	Title IA Funds Consolidated	Title IIA Funds Consolidated	Title III Funds Consolidated	Title IVA Funds Consolidated	Requirement
<i>Maple</i>	\$70,735	\$4,160	0	\$35,975	Requires at least one investment meeting the intent of: <ul style="list-style-type: none"> <li>Title IA</li> <li>Title IIA</li> <li>Title IVA</li> </ul>
<i>Oak</i>	\$136,030	\$82,700	0	0	Requires at least one investment meeting the intent of: <ul style="list-style-type: none"> <li>Title IA</li> <li>Title IIA</li> </ul>

**Consolidated Administration (ConAdmin)** – LEAs may consolidate funds into a single pool to support administrative activities across the Title programs in the consolidated application. Consolidating administrative funds into one pool provides additional spending options and facilitates coordination across programs.

For additional information on the allowable uses of these funds, please see the [Consolidated Administration Allowable Activities](#) document.

## General Provisions

### Parental Consent (§4001(a))

An LEA must obtain prior written, informed consent from the parent of each child who is under the age of 18 to participate in any mental health assessment or service that is funded with Title IVA.

### Prohibitions (§4001(b), §4001(c), §8526)

Title IVA funds may not 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. No child shall be required to obtain a prescription for a controlled substance as a condition of receiving an evaluation or other service described under this program or attending a school receiving Title IVA funds.

Title IVA funds may not be used for the following activities:

- Construction, renovation, or repair of any school facility
- Transportation, unless otherwise authorized under ESSA
- To develop or distribute materials, or operate programs directed at youth, that are designed to promote or encourage sexual activity
- To distribute or aid in the distribution 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 include the health benefits of abstinence
- To operate a program of contraceptive distribution in schools

## Questions?

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