

Considerations for Designing a Title IV, Part A Local Education Agency Application









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Purpose

As a formula grant program, Title IV, Part A (Title IV-A) requires each local education agency (LEA) that wants to receive funding to submit an application to the State education agency (SEA). According to the <u>Title IV-A statute</u>, mandatory information must be present within each LEA application. At a minimum, each application should include descriptions of the LEA's planned programs and activities, its objectives and intended outcomes, and its plans for outcome evaluations. Each application should also include how the LEA will meet the various assurances outlined in Section 4106 (e)(2).

Introduction

The purpose of this resource is to provide Title IV, Part A (Title IV-A) State coordinators (SCs) with suggested information and topics to consider when designing local education agency (LEA) applications for Title IV-A funds to help ensure that LEAs provide all information as required by the statute. The resource is divided into two parts. Part 1 outlines the statutorily required components of an application and suggested processes for designing applications that capture those components. Part 2 shares existing tools and resources that different State education agencies (SEAs) may provide LEAs to support the development and completion of Title IV-A LEA applications.

Part 1: Statutory Requirements and Processes for Designing and **Reviewing Applications**

Part of the SC's role is to design LEA applications for Title IV-A program funds that solicit all information from LEAs as required by the statute. In the design process, SCs can also build in questions to gather data on outcomes that will be used for public reporting as required by the statute. This helps to ensure that SCs are holding LEAs accountable to their programming choices

and the intended outcomes. Additionally, SEAs may consider adopting a consolidated application method by which LEAs request most of their Federal and state program funds through one single application. This method provides LEAs the opportunity to consolidate their resources and planning efforts and to decrease the amount of paperwork that results from completing multiple applications.

Further, SCs can aid LEAs in completing their Title IV-A subgrant applications by clearly communicating statutory requirements and the processes needed to develop application content that meets those requirements. This section will describe the information that SCs can gather from the applications for LEAs to meet statutory requirements, as well as actions SCs can take to guide LEAs in developing application content (summarized in Figure 1).



Figure 1: Components of Application Development and Review



Publicly Provide Expected Allocation Amounts

Every LEA Title IV-A subgrant application that is approved by the SEA will receive at least \$10,000, which is the minimum award amount, as mandated by the statute. For awards greater than \$10,000,2 LEAs can decide to apply and carry out their activities individually, or they can form a consortium with surrounding LEAs in their state. Each consortium needs to submit only one application to the SEA.³

SEAs typically publish expected LEA allocations on state Title IV-A Web pages. SCs can direct LEAs to locate their allocation amount before beginning their Title IV-A subgrant application, as the allocation amount will dictate processes for completing certain application requirements, such as the needs assessment and budgetary constraints (see "Budget and Budgetary Constraints"). For example, Oregon has all LEA allocation amounts available on their state Title IV-A Website, alongside other resources related to application materials.4

Request Program Assurances and Other Documentation

Title IV-A requires an LEA or a consortium of LEAs to provide assurance that it will (1) prioritize the distribution of funds to schools served by the LEA(s) that demonstrate the highest need, (2) abide by the budgetary constraints designated by their allocation amounts (see "Budget and Budgetary Constraints" below), (3) comply with equitable participation requirements regarding private schools, and (4) complete an annual state report regarding how funds for the program are being used.

To comply with the equitable participation requirement, LEAs must consult with appropriate officials of the private school to which they provide services and benefits.⁵ These services must be equitable to those provided to eligible public school students. SCs can advise LEAs that consultation should be done before LEAs design their programs and develop their applications. Eligible students include those who attend a nonprofit K-12 school, have low achievement scores, and live within a participating LEA.

The goal of consultation between LEAs and private school officials is for both parties to reach a consensus on key components of serving eligible private school students. SCs can encourage LEAs to discuss issues such as identifying eligible students and their needs, determining the services that will be offered as well as the scope and logistics of the service

Budget and Budgetary Constraints

If an LEA requests \$30,000 or more in Title IV-A funds, the LEA must meet all the budgetary requirements identified in the following bulleted list. If the LEA requests less than \$30,000, it must meet only one of these requirements.

- At least 20 percent of funds received must support one or more activities related to Well-Rounded Educational Opportunities.
- At least 20 percent of funds received must support one or more activities related to Safe and **Healthy Students**.
- A portion of funds must support one or more activities related to the Effective Use of **Technology**; however, no more than 15 percent of funds in this category should be used for technology infrastructure.

When allocation amounts are posted by the SEA, SCs can also make sure that these budgetary constraints are clearly communicated to LEAs prior to assessing their needs and developing their Title IV-A priorities and activities. Some states also provide LEAs with budget templates (see "Budget Worksheets") that include checks to help ensure that LEAs meet these budget constraints depending on their allocation amounts. This can help LEAs budget appropriately when designing program activities.

provision process, and assessing the services and using the feedback for continuous improvement. While not required by the statute, SEAs have the option to require that their LEAs provide "affirmations of consultation" before submitting applications, which serves as proof that the LEA has made good faith attempts to consult with private schools. For example, <u>Texas</u> and <u>Arizona</u> have developed documentation that LEAs might use as affirmation of consultation with private schools.6,7

Request Proof of Stakeholder Group Consultation

An LEA or a consortium of LEAs is required to develop its Title IV-A subgrant application through consultation with



a group or groups of community stakeholders. Stakeholders should be individuals with relevant and demonstrated expertise in programs and activities designed to meet the purpose of the

Title IV-A program. Examples of stakeholders include, but are not limited to

☐ Students:

☐ Parents:

☐ Teachers and specialized instructional support personnel;

☐ Principals and other school leaders;

☐ Community-based organizations;

☐ Local government representatives (e.g., local child welfare agency or public housing agency);

☐ Indian tribes or tribal organizations; and

☐ Charter school staff.

For monitoring purposes, SCs might ask LEAs to provide proof of stakeholder convenings in a variety of ways through the application. Some SEAs include a check box for stakeholder engagement or ask for a summary of how LEAs will consult stakeholders in the application. Other examples of proof could be meeting attendance sign-in sheets, meeting minutes, and documented evidence from an exercise that took place during the meeting.



Assist LEAs in Determining Needs



Title IV-A requires LEAs to prioritize the distribution of Title IV-A funds to schools with the greatest need, as determined by the LEA.

To determine this need, all LEAs that request \$30,000 or more in Title IV-A funds must complete a comprehensive needs assessment every three years. LEAs that request less than \$30,000 in Title IV-A funds do not need to complete a comprehensive needs assessment - though they are encouraged to - but are still required to base activities on a demonstrated district-determined need. The needs assessment will guide the development of the LEA's entire Title IV-A program. SCs can provide LEAs with suggested needs assessment tools that will be helpful in conducting comprehensive needs assessments. SCs might also consider adding a section to the Title IV-A subgrant application that requires LEAs to provide proof of completion of a needs assessment.

The T4PA Center has a comprehensive needs assessment tool to which SCs might direct LEAs, and several states provide alternate tools that LEAs can consider. LEAs should select the needs assessment tool that best fits the context of their communities.

Aid LEAs in Developing Outcome Measures to Track

After LEAs conduct their needs assessment. SCs can assist them in determining their desired outcomes from activities implemented under Title IV-A. Examples of relevant and measurable outcomes SCs might suggest for LEAs include improvement in state assessment scores; decreases in dropout rates; or a certain percentage of favorable responses on annual

school climate surveys of students, families, and staff. To determine outcomes, SCs can prompt LEAs to consider the following questions:

- Who is the target population (e.g., students, teachers, parents)?
- What needs to change (e.g., increased skills, increased positive behaviors)?
- · What activities or programs will effect change (e.g., increased professional development, implementing trauma-informed practices)?
- How is the change measured (e.g., evaluation surveys, school climate data and report card metrics)?

SCs may also encourage LEAs to determine outcomes or objectives for their Title IV-A program that are measurable and tied to the needs outlined in the needs assessment. SCs can recommend performance measurement tools that allow LEAs to collect the most relevant data that are directly related to a LEA's target population and intended outcomes (see "Performance Measurement Tools" below).

Performance Measurement Tools

Performance measurement tools can be used to collect data about the impact of a program or activity funded under Title IV-A and to evaluate whether a given outcome has been reached or improved upon in a certain period. SCs can help LEAs decide which performance measurement(s) will best determine whether the LEAs have achieved their desired outcomes.

Some states, like New Hampshire, have provided LEAs with several suggestions for performance measurements that may be helpful in measuring the impact of their Title IV-A activities, including state assessments, behavior and attendance tracking systems, or surveys.



Collect Information About Activities That Meet Needs and Achieve Desired Outcomes

Applications must collect information about the activities that LEAs will implement using Title IV-A funds. Each activity should fall into one of the three priority categories of Title IV-A: Well-Rounded Educational Opportunities, Safe and Healthy Schools, or Effective Use of Technology. SCs can include a section in their applications that require LEAs to describe intended activities and how they fall into one of the priority categories. Many SEAs also provide comprehensive lists of allowable activities that LEAs can draw upon when designing activities.

SCs can encourage LEAs to develop activities based on demonstrated need, desired outcomes, and proposed performance measurement methods. The U.S. Department of Education recommends that, when possible, LEAs propose evidence-based activities that are likely to produce the LEAs' desired outcomes in their given local context.9 SCs can also remind LEAs of the budget constraints based on their requested allocation amount. For example, any LEA that receives \$30,000 in Title IV-A funds must spend at least 20 percent of funds on activities related to Well-Rounded Educational Opportunities (see "Budget and Budgetary Constraints").

T4PA Center Resource

For more information on reviewing LEA applications, please see the T4PA Center's Title IV, Part A Application Checklist and Rubric tool.



Review and Approve Applications



In reviewing applications, SCs must determine if they meet the minimum requirements and quality to be approved. It may be helpful for SCs to use

application review checklists to complete this process. In addition to the mandatory statutory requirements, some of the things to consider in reviewing applications include

- ☐ The prioritization of evidence-based programs;
- ☐ The link between the proposed program and the needs identified in the needs assessment, if available;
- ☐ Coordination of services with other schools or community-based organizations;
- ☐ Coordination of services to supplement, not supplant, current funds used for programming in the three content areas;
- ☐ The involvement of parents, families, and guardians in activities;
- ☐ Partnerships with institutions of higher education, businesses, nonprofit organizations, community-based organizations, or other public or private entities with demonstrated records of success in implementing activities under the content areas {Title IV, Part A Sec 4107(a)(2)¹⁰; and
- \square The quality of the evaluation plan.

Note that LEAs may require technical assistance as they gather the necessary information to complete their applications. Checklists and Frequently Asked Questions (FAQs) can serve as guides that simplify the process.



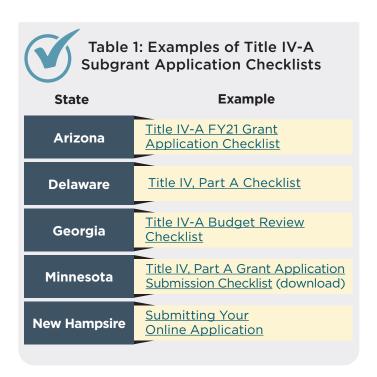
Part 2: Helpful Tools and Resources to Support Development and Completion of Title IV-A **Applications**

Many states have developed tools and resources that may support LEAs in the application development process. These tools and resources are intended to reduce the burden of developing and completing Title IV-A subgrant applications by increasing efficiency, ensuring that all the necessary information is compiled, and answering any questions that may arise. The tools and resources included below are divided into the following categories: checklists, application templates, consolidated applications, budget templates, and FAQs. These tools and resources were identified through a review of Title IV-A Web pages for all U.S. states and territories.

Checklists

A few states have developed checklists to help ensure that LEAs include all the required components as they develop and complete their Title IV-A subgrant applications (see examples in Table 1). Arizona's checklist provides a guide to LEAs for checking that each section of their Title IV-A subgrant application includes the required information. Further, the checklist provides LEAs with a few exemplar responses to some of the sections in the application (e.g., budget narrative) and visuals that may be helpful as LEAs complete their application. On the other hand. Delaware's checklist is for a consolidated application and outlines the required components that LEAs must address for Title IV-A funding. While Delaware's checklist may be used by LEAs as they complete the Title IV-A section of their consolidated application, the checklist is intended for reviewers to evaluate an LEA's application and communicate to the LEA any items that may need to be addressed.

Minnesota and New Hampshire have also developed checklists that outline the required components that must be addressed in a Title IV-A subgrant application. Their checklists provide guidance on the different steps that LEAs must take to successfully submit their application in their designated online portal. In contrast, Georgia's checklist focuses only on the budget component of the Title IV-A subgrant application and is intended for LEA planning purposes only.

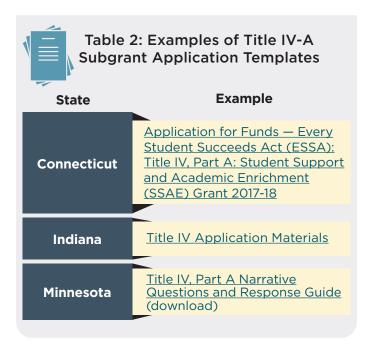


Title IV-A Subgrant Application Templates

Some states have developed templates that LEAs can use to complete and organize the content of their Title IV-A subgrant applications (see examples in Table 2). Each template provides LEAs with the specific questions that they need to answer in each section, guidance or instructions to help ensure that their responses include all the required information, and space to provide their responses. In the case of Minnesota, the application template includes all the narrative questions that will appear on the LEAs' application portal. As such, this template provides a space for LEAs to develop their responses and allows them to simply copy and paste their responses into the



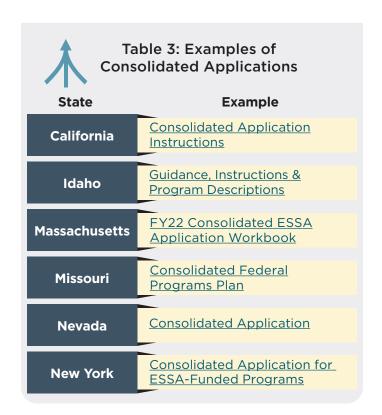
portal. Further, Minnesota's template provides guidance on the number of characters that are allowed for each question (e.g., "this answer is limited to 300 characters"). Indiana provides a fillable template that includes the required components needed in a Title IV-A application and can be submitted directly to the LEAs' designated platform. Additionally, for each focus area, Indiana's template provides LEAs with a "Menu of Interventions" that they may refer to as they complete their section on Title IV-A activities.



Consolidated Applications

Some states have adopted a consolidated application method by which LEAs request most of their Federal and state program funds through one single application (see examples in Table 3). This method provides LEAs the opportunity to consolidate their resources and planning efforts and decreases the amount of paperwork that results from completing multiple applications. Some states (e.g., California, Idaho, Nevada) provide LEAs with guidance or instruction documents that highlight the information they will need or steps to take in order to complete their consolidated application, while other states (e.g., Massachusetts, Missouri, New York) provide

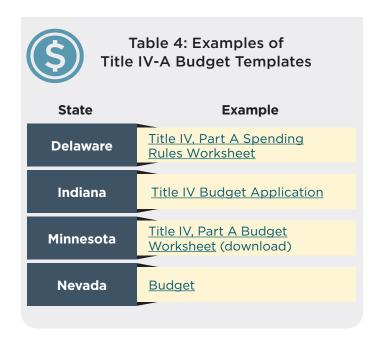
LEAs with templates they may use to develop and complete their consolidated application. The consolidated application templates provide LEAs with the specific questions that they need to answer in each section, guidance or instructions to help ensure that their responses include all the required information, and space to provide their responses. While Missouri and New York collect their consolidated application information through an online portal, Massachusetts collects all the required information for its consolidated application through an Excel workbook, which is then directly submitted to the application portal. Massachusetts' Application Workbook is equipped with a range of helpful features, such as different tabs for each Title LEAs may request funds from and budget worksheets for the respective Title; cells that automatically populate based on previously entered information; and tip boxes throughout the entire workbook that provide LEAs with instructions, tips to avoid common mistakes, and resource boxes that link to external materials that LEAs may find useful as they complete the application.



Budget Worksheets

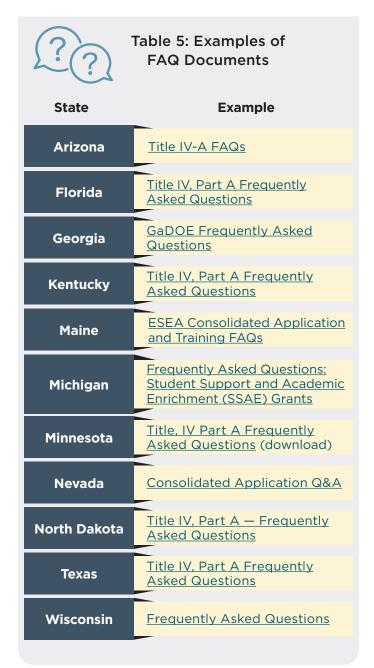
Given the budget requirements outlined by the statute (see "Budget and Budgetary Constraints" in Part 1), some states have developed budget worksheets to help ensure that LEAs are meeting the set thresholds when allocating their funds (see examples in Table 4). Some of these budget worksheets (e.g., those of Delaware, Indiana, Minnesota) are designed to automatically populate on the basis of previously entered information. They also provide LEAs with instructions to help them fill out the budget worksheet correctly. In the case of Minnesota, the budget worksheet is also equipped with a feature that flags to the LEA if the entered amount for a focus area is above or below the set threshold.

While Nevada also provides a budget worksheet, it is specifically designed for a consolidated application. The budget worksheet allows LEAs to aggregate their expenses and funds on each budget item across multiple grant programs.



FAQs

Various states have developed FAQ documents or pages. These documents and pages are intended to answer general questions related to Title IV-A as well as questions related to state-specific requirements. These documents and pages may be helpful to SCs as they design and review applications and to LEAs as they complete their applications (see examples in Table 5).



ENDNOTES

- ¹ T4PA Center. (n.d.). Title IV, Part A Statute. Retrieved from https://t4pacenter.ed.gov/T4PAStatutes.aspx#Sec%204104
- ² T4PA Center. (n.d.). Title IV, Part A: Student Support and Academic Enrichment Program Profile. Retrieved from https://t4pacenter.ed.gov/docs/T4PA_ProgramProfileFlyer_508C.pdf
- ³ T4PA Center. (n.d.). Title IV, Part A Statute. Retrieved from https://t4pacenter.ed.gov/T4PAStatutes.aspx#Sec%204105
- ⁴ Oregon Department of Education. (n.d.). Title IV-A Student Support and Academic Enrichment (SSAE) Grant. Retrieved from https://www.oregon.gov/ode/schools-and-districts/grants/ESEA/Pages/SSAE.aspx
- ⁵ U.S. Department of Education. (2019). Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended by the Every Student Succeeds Act: Providing Equitable Services to Eligible Private School Children, Teachers, and Families. Retrieved from https://t4pacenter.ed.gov/docs/equitable-services-guidance-logo-100419.pdf
- ⁶ Texas Education Agency. (n.d.). Federal Program Compliance Division Affirmation of Consultation with Private Nonprofit School (PNP) Officials: Formula Grants School Year 2022-2023. Retrieved from https://tea.texas.gov/ sites/default/files/pnp-affirmation2223.pdf
- ⁷ Arizona Department of Education. (n.d.). Welcome to Equitable Services. Retrieved from https://www.azed.gov/ titlei/privateschools
- ⁸ T4PA Center. (2020, April 9). LEA Needs Assessment Tool Live Demonstration. Retrieved from https://t4pacenter. ed.gov/EventDetails.aspx?id=10
- ⁹ U.S. Department of Education. (2016). Non-Regulatory Guidance: Student Support and Academic Enrichment Grants. Retrieved from https://www2.ed.gov/policy/elsec/leg/essa/essassaegrantguid10212016.pdf
- ¹⁰ T4PA Center. (n.d.). *Title IV, Part A Statute*. Retrieved from https://t4pacenter.ed.gov/T4PAStatutes.aspx#Sec%204107



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