

# ESSA Title II and Title IV



LASAFAP - March 7, 2024

# Agenda

- ESSA Title II
- ESSA Title IV, Part A
- Title II and Title IV Equitable Services Highlights



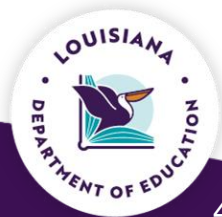
# Title II



Presenter - Edeltress Brown, Federal Support

# Purpose of Title II under ESSA

- Increase student achievement consistent with challenging State academic standards
- Improve the quality and effectiveness of teachers, principals, and other school leaders
- Increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools
- Provide low-income and minority students greater access to effective teachers, principals, and other school leaders



# Goals of Title II

- Enhance the quality of teaching and principal leadership in order to improve student achievement
- LEA activities supported by Title II-A funds MAY include teacher, principal and school leader recruitment; training; induction and mentoring; professional development; retention; and class size reduction
- LEAs should conduct an assessment of their hiring and professional development needs for improved teacher and principal quality
- LEAs MUST provide teachers and staff of private schools within their boundaries with equitable opportunities to participate in professional development. This professional development must target the needs of private school personnel as determined through consultation with representatives of private schools



# Title II Requirements

## Develop a Plan

Each LEA develops a plan that addresses their needs for professional learning and the recruitment, induction, and retention of teachers. There should be a clear connection between identified needs and Title IIA activities. This plan can be used for teachers and administrators in all schools, not just Title I schools. LEAs are to consult with state-approved private schools within their LEA boundaries that have chosen to participate in Title II to develop a plan based on their needs.

## Class Size Reduction (CSR)

ESSA supports the use of Title IIA funds to reduce class size to a level that is evidence-based, to the extent the State determines that such evidence is reasonably available, to improve student achievement through the recruiting and hiring or additional effective teachers.



# Allowable Expenditures

Here are a few examples:

- Professional learning for all educators (including librarians, counselors, arts teachers, and paraprofessionals)
- Job-embedded activities
- Teacher recruitment, training, and retention
- Partnerships with higher education and high-needs districts
- Class size reduction teachers
- Grants to enhance education preparation programs
- Teacher mentoring and coaching
- Enhancing principals through ongoing professional learning



# Non-Allowable Expenditures

- Classroom materials for students are not allowed
- Funds may not be used for rental of a venue to provide professional learning unless the expense is determined to be necessary and reasonable
- Title II funds may not be used to purchase food or beverages





# Title II Flex

Title II offers an LEA the flexibility to design and implement a wide variety of activities that can promote staff to meet the individual needs of educators based on educator practice and student learning. Professional learning opportunities support the development of all school personnel including teachers, paraeducators, principals, and other school leaders and may be individualized to effectively support new and early career educators to advance their professional practice and improve their ability to produce positive student outcomes.



# Title IV, Part A

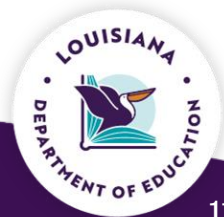
## Student Support & Academic Enrichment



# Purpose of Title IV, Part A under ESSA

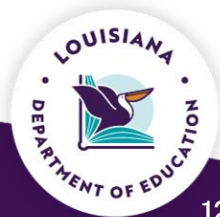
Title IV, Part A, Student Support and Academic Enrichment (SSAE) grants are intended to improve students' academic achievement by increasing the capacity of States, LEAs, schools, and local communities to:

- provide all students with access to a well-rounded education,
- improve school conditions for student learning, and
- improve the use of technology in order to improve the academic achievement and digital literacy of all students. (*ESEA* section 4101).



# Determining LEAs and Non-public Needs

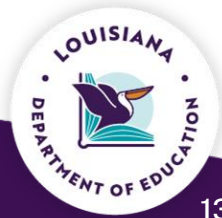
- LEAs receiving allocations of \$30,000 or more shall be required to conduct a Comprehensive Needs Assessment, at least once every three years.
- Prioritize activities in the application based on outcomes of the Comprehensive Needs Assessment, if necessary (ESSA Section 4106 (d). Keep in mind...
- LEAs receiving less than \$30,000 can assess needs in other ways.
- Non-public only receive services and not funds. LEAs may state allocations for services, never funds or money.
- Separation of church and state means non-public/private schools can't get federal funding/money. (ESEA Act of 1965)
- Non-public can complete the Non-public Needs Assessment form, please assist if needed, as per U.S. Dept. of Ed.



# Areas of Needs Assessment

Prioritize outcomes and objectives based on an assessment for improvement to...

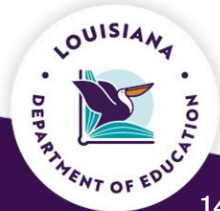
- Provide access to and opportunities for **Well-Rounded Education (WR)** for all students.
- Create a **Safe and Healthy (SH)** school environment for students to learn, including physical and mental health.
- Access strategies to personalize learning experiences supported by technology and professional development for the **Effective Use of Technology (TPD)**.



# Involving Stakeholders

As per the U.S. Department of Education, Non-Regulatory Guidance, Student Support and Academic Enrichment Grants, stakeholders **must** include, but are not limited to...

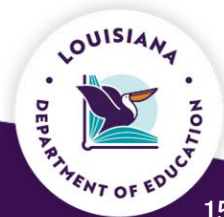
\*Parents \*Teachers \*Principals \*Students \*School Leaders  
\*Supervisors \*Directors \*Private School Leaders Who Participate in  
Equitable Services \*LEA Superintendents \*Charter School  
Administrators and Staff \*Local Government Representatives  
\*Specialized Instructional Support Staff \*Indian Tribes/Tribal  
Organizations Community-Based Organizations \*Other relevant experts in  
programs and activities that meet the purpose of Title IV, Part A.



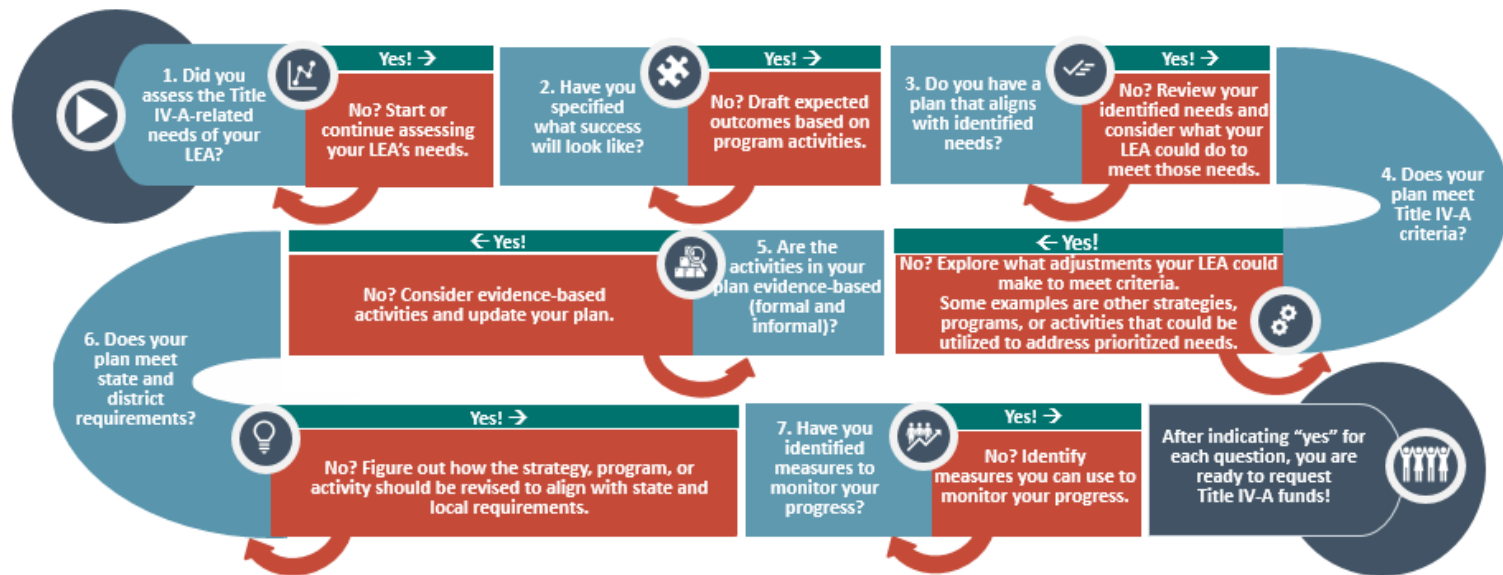
# Conducting a Needs Assessment

Conducting a needs assessment and gathering stakeholder feedback will tell the LEA the:

- Areas of greatest need;
- Underlying causes of the needs; and
- Types of activities to offer



# Program Planning Flowchart to Confirm Appropriate and Allowable Use of Title IV, Part A Funds

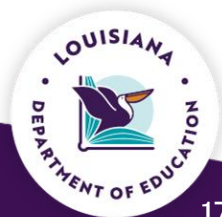




# Objective, Outcomes, and Measures of Effectiveness

Under Section 4106, Contents of the Local Application, LEAs must describe “the program objectives and intended outcomes for activities” and how they will “periodically evaluate the effectiveness of the activities...”

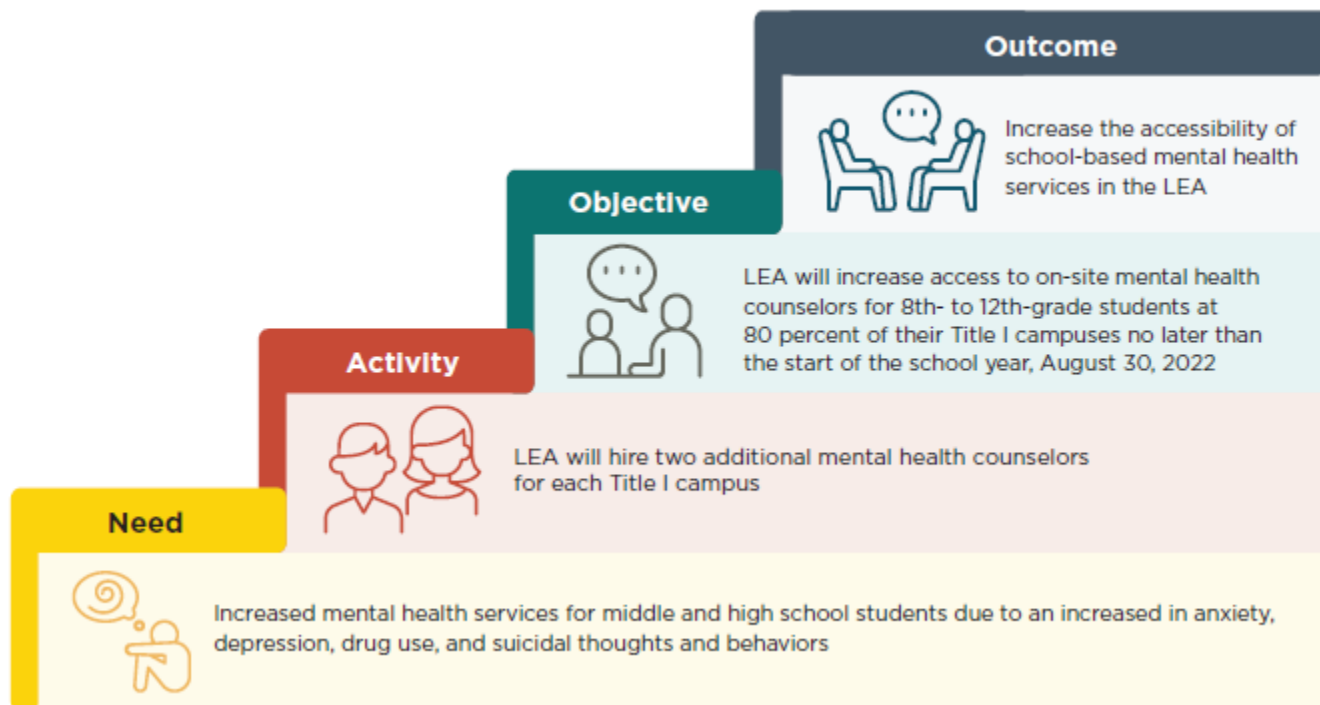
Measuring objectives and outcomes provides evidence of effectiveness, bolstering LEAs confidence that the activities or interventions are high quality.



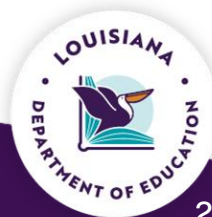
# Four-Step Process for Implementing High-Quality Objectives and Outcomes



Figure 2: From Needs to Outcomes



<b>Allowable uses of grant funds:</b>	<b>Unallowable uses of grant funds</b>
<p><b>Promote Well-Rounded Education</b></p> <ul style="list-style-type: none"> <li>➤ Improve access to foreign language instruction, arts, and music education</li> <li>➤ Support college and career counseling, including providing information on opportunities for financial aid through the early FAFSA</li> <li>➤ Provide programming to improve instruction and student engagement in science, technology, engineering and mathematics (STEM), including computer science, and increasing access to these subjects for underrepresented groups</li> <li>➤ Promote access to accelerated learning opportunities including Advanced Placement (AP) and International Baccalaureate (IB) programs, dual or concurrent enrollment programs and early college high schools</li> <li>➤ Strengthen instruction in American history, civics, economics, geography, government education, and environmental education</li> </ul>	<p><b>Promote Well-Rounded Education</b></p> <ul style="list-style-type: none"> <li>➤ Textbooks (Must exhaust all other means of funding prior to utilizing Federal grant funds)</li> <li>➤ Direct reimbursement to private, non-public schools (if applicable)</li> <li>➤ Construction - major building construction, structural alterations to buildings, building maintenance, or repairs</li> <li>➤ Advertising and public relations</li> <li>➤ Awards and Award Ceremonies</li> <li>➤ Incentives and prizes</li> <li>➤ Gift Cards</li> <li>➤ Fundraising</li> <li>➤ Food (permissible if reasonable/necessary to meet intent/purpose of program)</li> <li>➤ Non-educational games, devices, and field trips</li> <li>➤ Social Events</li> <li>➤ Alcoholic Beverages</li> </ul>
<p><b>Promote Safe and Healthy</b></p> <ul style="list-style-type: none"> <li>➤ <b>Safe and Supportive Schools</b> <ul style="list-style-type: none"> <li>○ Bullying prevention</li> <li>○ Relationship building skills</li> <li>○ Dropout prevention</li> <li>○ Re-entry programs and transition services for justice-involved youth</li> <li>○ School readiness and academic success</li> <li>○ Child sexual abuse awareness and prevention</li> <li>○ Reducing use of exclusionary discipline practices and promoting supportive school discipline</li> <li>○ Suicide prevention</li> <li>○ School Resource Officer</li> </ul> </li> </ul>	<p><b>Promote Safe and Healthy</b></p> <ul style="list-style-type: none"> <li>➤ Textbooks (Must exhaust all other means of funding prior to utilizing Federal grant funds)</li> <li>➤ Direct reimbursement to private, non-public schools (if applicable)</li> <li>➤ Construction - major building construction, structural alterations to buildings, building maintenance, or repairs</li> <li>➤ Advertising and public relations</li> <li>➤ Awards and Award Ceremonies</li> <li>➤ Incentives and prizes</li> <li>➤ Gift Cards</li> <li>➤ Fundraising</li> <li>➤ Food (permissible if reasonable/necessary to meet intent/purpose of program)</li> <li>➤ Non-educational games, devices, and field trips</li> </ul>



<ul style="list-style-type: none"> <li>➤ <b>Student Physical and Mental Health</b> <ul style="list-style-type: none"> <li>○ Drug and violence prevention</li> <li>○ Health and safety practices in school athletic programs</li> <li>○ School-based health and mental health services</li> <li>○ Healthy, active lifestyle</li> <li>○ Nutritional education</li> <li>○ Physical activities</li> <li>○ Trauma-informed classroom management</li> <li>○ Preventing use of alcohol, tobacco, smokeless tobacco, electronic cigarettes</li> <li>○ Chronic disease management</li> </ul> </li> <li>➤ <b>Cross-Cutting Activities</b> <ul style="list-style-type: none"> <li>○ Mentoring and School Counseling</li> <li>○ Schoolwide Positive Behavioral Interventions and Supports</li> <li>○ Pay for Success Initiatives</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>➤ Social Events</li> <li>➤ Alcoholic Beverages</li> </ul>
<p><b>Promote Effective Use of Technology</b></p> <ul style="list-style-type: none"> <li>➤ Support high-quality professional development for educators, school leaders, and administrators to personalize learning and improve academic achievement</li> <li>➤ Build technological capacity and infrastructure</li> <li>➤ Carry out innovative blended learning projects</li> <li>➤ Provide students in rural, remote, and underserved areas with the resources to benefit from high-quality digital learning opportunities</li> <li>➤ Deliver specialized or rigorous academic courses and curricula using technology, including digital learning technologies</li> </ul>	<p><b>Promote Effective Use of Technology</b></p> <ul style="list-style-type: none"> <li>➤ Technology purchases over 15% of the grant</li> <li>➤ Major infrastructure enhancements</li> <li>➤ Cell phones for personal use</li> <li>➤ Direct reimbursement to private, non-public schools (if applicable)</li> </ul>

# What next?

Your objectives, outcomes, and activities have been identified:

- What will be your measures of effectiveness?
- How are you going to continuously monitor objectives for effectiveness?
- How will you publicly report your outcomes?
- How are you going to align fiscal support to achieve objectives and desired outcomes?





Overview	Reverting Funding	ESSA Transfers	Title I	Title IV	IDEA	Nonpublic	Allocations	Budget Indirect Cost	Submit	Amendment Description	Application Functions
Title IV Specific Program Objectives								Title IV Allowable Uses			

Title IV Allowable Uses

[Click for Instructions](#)

Title IV Part A Total Available Amount (Current Yr Funds):   
 Maximim allowed for Title IV Admin Cost - 2% of Award:

Notes:

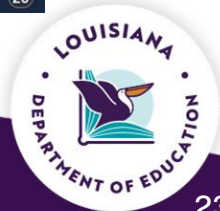
**Funding Over \$29,999 - Mandatory Profile**

Indirect Costs (Enter amount to be budgeted)   
 Administrative Costs (Enter amount to be budgeted)   
 Title IV Part A Total Available Amt Less (Indirect + Administrative) Costs:   
 Public Prior Year Funds   
 NonPublic Prior Year Funds   
 Title IV Part A Total Available Current and Prior Year   
**Private School Proportionate Share**  
 Amount Reserved for Equitable Services for Participating Private Schools   
**LEA Proportionate Share**  
 Amount available for LEA distribution across program objectives.

Enter Percent of TIVA budget to be used in each Category

20% Minimum Well Rounded Education    
 20% Minimum Safe and Healthy Students    
 1% Minimum Effective Use of Technology Professional Development Only (TPD)    
 Note: No more than 15% on Technology Infrastructure: devices, eqpt, software & digital content. At least 85% to support Educational Technology.  
 15% Technology Infrastructure (TIN)   
 85% Educational Technology (TPD)   
 Distribution Totals

[Save Page](#)

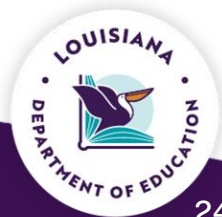


# Title IV Program Objective Evaluation

If the Title IV, Part A program specific objectives, outcomes, measures of effectiveness are:

- written correctly;
- data/documentation are accurate; and the
- results are confirmed

then, the Program Objective Evaluation will be simple to address.





# Helpful Resources...

Assisting LEAs with the Use of Evidence-based Practices and Programs... [https://t4pacenter.ed.gov/Docs/ResourceLibrary/Title\\_IV-A\\_LEA\\_Needs\\_Assessment\\_Tool.xlsx](https://t4pacenter.ed.gov/Docs/ResourceLibrary/Title_IV-A_LEA_Needs_Assessment_Tool.xlsx)

Selecting Evidence – Based Programs and Practices for Title IV, Part A Activities...  
[https://t4pacenter.ed.gov/docs/T4PAselectingEBPs2\\_508C.pdf](https://t4pacenter.ed.gov/docs/T4PAselectingEBPs2_508C.pdf)

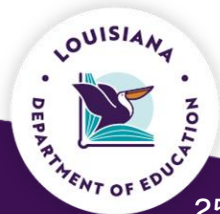
Best Practices in Training and Technical Assistance... [https://t4pacenter.ed.gov/docs/T4PA\\_BestPractices2\\_508C.pdf](https://t4pacenter.ed.gov/docs/T4PA_BestPractices2_508C.pdf)

Coaching LEAs to Write Quality Objectives and Outcomes....  
[https://t4pacenter.ed.gov/Docs/ResourceLibrary/T4PA\\_Reporting\\_Product\\_Coaching\\_LEAs\\_brief\\_508c.pdf](https://t4pacenter.ed.gov/Docs/ResourceLibrary/T4PA_Reporting_Product_Coaching_LEAs_brief_508c.pdf)

Effective Use of Technology Resources Guide for Local Education Agencies....  
<https://t4pacenter.ed.gov/docs/T4PAEUTResourceGuide508C.pdf>

Title IV – A Implementation Stages Planning Tool...  
[https://t4pacenter.ed.gov/Docs/ProductResource/TitleIVAImlplmentationStagesPlanningTool\\_508C.pdf](https://t4pacenter.ed.gov/Docs/ProductResource/TitleIVAImlplmentationStagesPlanningTool_508C.pdf)

Appropriate and Allowable Use of Title IV -A Funds  
<https://t4pacenter.ed.gov/forum/getattachment.ashx?fileid=2233>



# Helpful Resources con't.

Effective Use of Technology: Thinking Beyond Devices and Professional Development...

[https://t4pacenter.ed.gov/Docs/ResourceLibrary/T4PA\\_EUT\\_Thinking\\_Beyond\\_Devices\\_508c.pdf](https://t4pacenter.ed.gov/Docs/ResourceLibrary/T4PA_EUT_Thinking_Beyond_Devices_508c.pdf)

Braiding Funds to Enhance Title IV-A Program Efficiency and Outcomes...

<https://t4pacenter.ed.gov/Docs/ResourceLibrary/Braiding%20Funds%20to%20Enhance%20Title%20IV-A%20Program%20Efficiency%20and%20Outcomes.pdf>

Developing Stakeholder Relationships to Support School Programming...

<https://t4pacenter.ed.gov/docs/T4PAStakeholdRelationship508C.pdf>

Addressing School Mental Information Sheet...

<https://t4pacenter.ed.gov/Docs/AddressSchoolMentalHealth508C.pdf>

## **Statute and Non-Regulatory Guidance...**

Non – Regulatory Guidance, Student Support and Academic Enrichment Grants...

<https://www2.ed.gov/policy/elsec/leg/essa/essassaegrantguid10212016.pdf>

Title IV, Part A Statue... <https://t4pacenter.ed.gov/T4PAStatutes.aspx>



# Title II and Title IV

Equitable Services Highlights



Presenter - Daphne Flentroy, State Ombudsman

# Title II and IV Highlights...

**Above all else... Documentation is the KEY! Document, document and document some more!**

- **Do cross reference checks, create charts and collect data to support your documentation as needed.**
- **Check the statute and non-regulatory guidances**
- **Contact State Ombudsman as needed**



# Title II and IV Highlights con't...

- **LEA obligation of funds/allocations for services...**
- ESEA section 8501(a)(4)(B) requires an LEA to obligate funds for equitable services “in the fiscal year for which the funds are received by the agency.”

## However, ESEA also states...

- The applicable fiscal year is the Federal fiscal year, which ends on September 30 of each year.
- Although the State in which an LEA is located may operate on a different fiscal year (e.g., July 1 through June 30), September 30 is the date by which an LEA must obligate funds for equitable services to meet ESEA section 8501(a)(4)(B)
- For example, with respect to fiscal year 2023 ESEA funds that an LEA receives for the 2023-2024 school year, section 8501(a)(4)(B) requires an LEA to obligate the funds generated for equitable services by September 30, 2024.
- In other words, the obligation period does not end with the end of the school year or the State's fiscal year.



# Title II and IV highlights con't...

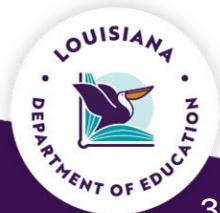
- Be sure to address all Title IV non-public budget items on the eGMS Title IV program page in the objective, intended outcomes and measurement of effectiveness sections for each applicable budget entry to avoid any monitoring issues or findings.
- All budget items must be on the Non-public Needs Assessment to correlate with the programing page as well.
- If needed, make updates, addendums as need to the Nonpublic Needs Assessment as needed during meaningful consultation.
- Remember Title IV is for academic enrichment for both public and non-public students.
- Activities must be evidenced/researched based or a best practice.



# Title II and IV Highlights con't...

- **Keep in mind all rollover and carryover guidance still applies...**
- **Funds allocated to an LEA for educational services and other benefits to eligible private school children, teachers and other educational personnel, and families must be obligated in the fiscal year for which the funds are received by the LEA.**
- **The ESSA grant period of availability is through September 30th.**
- **LEAs may set reasonable deadlines to ensure services are received and expensed prior to end of year.**
- **However, there may be extenuating circumstances in which an LEA is unable to obligate all funds within this timeframe in a responsible manner. Under these circumstances, the funds may remain available for the provision of equitable services under the respective program during the subsequent school year.**
- **In determining how such carryover funds will be used, the LEA must consult with appropriate private school officials.**

**ESEA Section 8501(a)(4)(B); 2 C.F.R. Part 200, Subpart E;  
Title VIII NRG B - 9, B- 10, B- 11, B - 12**

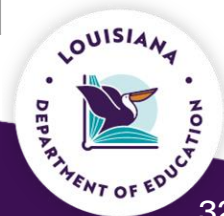


# Title II and IV Highlights con't...

## Title VIII Carryover Equitable Services initial Consultation Meeting Chart

<b>Services Received and Completed</b>	<b>Extenuating Circumstances</b>	<b>School Closed or Declined Allocations</b>
No Carryover Form needed.	Carryover Form needed.	No Carryover Form needed.
Redistribute remaining allocation among participating public and non-public schools	Redistribute to impacted non-public school or schools	Redistribute remaining funds among participating public and non-public schools
Must discuss transparently during consultation	Must discuss transparently during consultation	Must discuss transparently during consultation

ESEA Section 8501(a)(4)(B); 2 C.F.R. Part 200, Subpart E;  
Title VIII NRG B - 9, B- 10, B- 11, B - 12





# Titles II and IV Highlights con't...

## The new carryover question...

- **May private schools get a share of the carryover funds when public schools do not expend their funds?**

**No.** ESEA section 8501(a)(4) requires that expenditures for services to private school children and educators be equal, taking into account the number and educational needs of the children to be served, to the expenditures for participating public school children.

**Note that private schools do not directly receive equitable services funds. Instead, funds are allocated to the LEA for the provision of equitable services,** and the LEA either administers the services, or contracts with a third-party provider to administer the services, to eligible private school students and teachers.



Office of the Attorney General



# Titles II and IV Highlights con't...



- **Non-public administrative and indirect cost must be...**
  - Reasonable, necessary, allocable/allowable and compliant
  - Discussed with transparency and documented during consultation to justify the amount, purpose, and get buy - in from the private official
    - If the private official disagrees the LEA must put in writing/document their reason for the administrative costs.
    - Even though the LEA makes the final decision the private school may engage in further discussion with the LEA and consult the State Ombudsman for mediation if needed.

Keep in mind, the non-public/private school administrative cost should not be the same or in close proximity to the public administrative cost in that the later requires a larger amount of time and effort, as well as, personnel depending on the size/structure of the LEA.

# Titles II and IV Highlights con't...

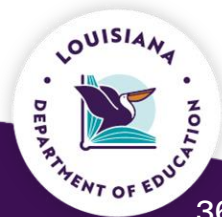
## Equitable Services Administrative Costs and Caps Chart

ESSA Program	Maximum Percentage for Administration
Title I, Part A – Improving the Academic Achievement of the Disadvantaged	▪
Title I, Part C – Education of Migratory Children (MEP)	▪
Title I, Part D – Subpart 2, Neglected & Delinquent (N&D)	▪
Title II, Part A – Supporting Effective Instruction	▪
Title III, Part A – Language Instruction for English Learners (EL)	≤ 2%
Title III, Part A – Immigrant Students	≤ 2%
Title IV, Part A Student Support and Academic Enrichment (SSAE)	≤ 2%
Title IV, Part B – 21 <sup>st</sup> Century Community Learning Centers	≤ 10%
Title V, Part B – Rural and Low Income Schools (RLIS)	▪
	▪ LEA establishes the % that is reasonable and necessary



# Titles II and IV Highlights con't

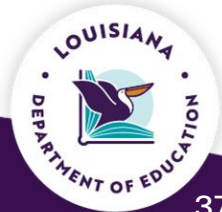
- LEA transfers after consultation...  
“Oh my, here we go” says the Federal Programs Director...
  - LEA must have another timely and meaningful consultation with the private school before making the transfer.
  - Remember... LEA must always provide eligible private school children and educators equitable services under the applicable program(s) to which, and from which the funds are transferred, based on the total amount of funds available to each program after the transfer.



# Titles II and IV Highlights con't...

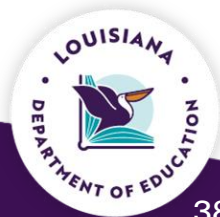
## HERE IS AN EXAMPLE...

- If an LEA transfers 50 percent of its Title II, Part A allocation to Title IV, Part A...
  - The LEA must provide Title II, Part A equitable services based on the amount of funds left in the Title II, Part A program after the transfer
  - And must provide Title IV, Part A equitable services based on the total amount of funds available under Title IV, Part A, including the transferred funds.



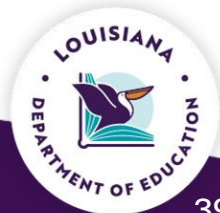
# Titles II and IV Highlights con't...

- **Pooling is encouraged...**
- Remember the LEA may pool funds
- The private school pools allocations for services
- Types of pooling
  - Pooling within an LEA
  - Pooling Across LEAS
- Either party (LEA or non-public) may initiate pooling
- Pooling must be discussed and agreed upon in consultation
- **If the LEA disagrees it must justify in writing to the non-public school why it disagrees**



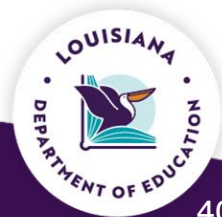
# Titles II and IV Highlights con't...

- What happens if the nonpublic decides later to...
  - Participate in the equitable services program but, no longer wants to pool...
- LEA must consult with appropriate private school officials regarding to share how the funds generated by children in that school will be used for services for eligible private school children and educators in other schools in the pool... generally, the funds generated for equitable services remain within the pool.
  - If the allocation from the declining private school substantially exceeds the amount needed to provide non-public equitable services to eligible private school children /educators participating in the pool, because the remaining nonpublic schools have a small number of eligible students and educators, the LEA may allocate the excess funds to provide services to eligible children and educators in public and private schools that are not part of the pool in a manner consistent with B-1.
- **Must have follow - up consultation with all non-public schools involved.**



# Titles II and IV Highlights con't...

- **What happens if the non-public school decides it no longer wants to participate in equitable services after the allocations have been determined and the LEA has the Intent to Participate and Affirmation of Consultation forms agreeing to participation...**
    - If a private school official decides not to have their eligible children and educators participate after allocations have been determined, the LEA may then treat the funds initially allocated for equitable services as additional funds that would be equitably redistributed for services for both public and participating private school children/educators.
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# Titles II and IV equitable services resources...

- ESEA Title VIII, Part, F Equitable Services Non - Regulatory Guidance, updated May 17, 2023  
<https://www2.ed.gov/about/inits/ed/non-public-education/files/esea-titleviii-guidance-2023>.
- Carryover Form - [https://www.louisianabelieves.com/docs/default-source/general-funding/np-carryover-request-fillable-form-b.pdf?sfvrsn=36f49c1f\\_8](https://www.louisianabelieves.com/docs/default-source/general-funding/np-carryover-request-fillable-form-b.pdf?sfvrsn=36f49c1f_8)
- YouTube Webinar - <https://www.youtube.com/watch?v=rIUJhBxkw-8>
- LRP Publications - <https://www.shoplrp.com/SearchResults.asp?Search=private>
- T4PA Center - <https://t4pacenter.ed.gov/index.aspx>

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