

## Title IVA: Determining Allowability of Activities

### Purpose

The Title IVA Student Support and Academic Enrichment (SSAE) grant program provides local educational agencies (LEAs) with supplemental funds to improve student academic achievement by increasing the capacity of states, LEAs, schools, and local communities to:

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

This document is intended to provide guidance to LEAs in determining whether a particular strategy may be allowable under one or more of the content areas. LEAs should also refer to the [Title IVA Allowable Uses document](#) and the [Title IVA: Identifying Content Area guidance document](#) for additional information.

### Determining Allowability of Proposed Title IVA Activities

There are several considerations for determining whether a particular activity, program, or training may be allowable under Title IVA. Below is a list of questions to guide LEAs in assessing the allowability of a particular strategy and ensuring that all necessary information has been included in the CFP Grant application.

### Allowability Review

1. Is the proposed activity informed by the results of a needs assessment, stakeholder engagement, and prioritization of schools?
  - Is sufficient, unique LEA and/or school data included in the Data Inventory to support a clear need for this activity?
- 2a. Is the proposed expenditure consistent with the intent of the Title IVA program?
  - Is the strategy creating and/or providing supplemental educational programs, activities, or training in one the three content areas to improve student achievement?
  - Is the investment written for stand-alone supplies?
    - Stand-alone supplies may be allowable if they can be tied directly to implementation of a specific program or activity that would be allowable under Title IVA
  - If an activity has been identified as “professional development” in the application, does that activity meet the definition of professional development under the ESEA? If not, would the strategy be more appropriately classified as a training?

- All professional development activities must be sustained (not stand-alone, one-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused (ESEA §8101(42))
  - Title IVA funds may be used to carry out other kinds of training activities that meet the program’s statutory requirements and that are not statutorily identified as “professional development.” Such activities would not need to meet the definition of professional development in ESEA §8101(42); however, the US Department of Education does encourage the use of this definition as a guide to developing meaningful training opportunities
- 2b. Is the proposed expenditure consistent with the purpose of at least one of the three content areas of the Title IVA program and is it appropriately categorized? (Please see [Title IVA Allowable Uses document](#) and [Title IVA: Identifying Content Area document](#) for additional information on each content area.)
- Does the proposed use of funds provide access to and opportunities for a **well-rounded education** for all students?
  - Does the proposed use of funds improve school conditions for student learning to create a **safe and healthy** school environment?
  - Does the proposed use of funds improve access to personalized learning experiences supported by technology and/or provide professional development opportunities for the **effective use of technology** and data?
3. Are the costs allowable under the Uniform Grant Guidance (2 CFR Part 200, Subpart E)?
- Is the cost reasonable and necessary to carry out the intent and purpose of the grant?
  - Is the expense targeted to a programmatic/administrative need in the LEA/school?
  - Does the LEA/school have the capacity to implement this strategy?
  - Is this the minimum amount necessary to meet the need? Is this a fair rate?
  - Is it chargeable to the grant award in proportion to the benefits received by the grant award as a result of the cost?
    - A cost is allocable to a federal award or cost objective if the goods or services involved are chargeable or assignable in accordance with relative benefits received; a district can only charge in proportion to the value received by the program
4. Does the proposed use of funds supplement what is currently offered?
- Is the proposed activity required by law?
  - If Title IVA funds were not available, would this activity be otherwise funded by other federal, state, and/or local monies?
  - If the answer is yes to either of these questions, using Title IVA funds for the activity is not allowable
5. Is the activity one of the following activities, which are prohibited under the ESEA?

- Medical services or drug treatment or rehabilitation, except for integrated student supports, specialized instructional support services, or referral to treatment for impacted students, which may include students who are victims of, or witnesses to, crime or who illegally use drugs (ESEA §4001(b))
- Religious worship or instruction or any educational service, including equipment and materials, that is not secular, neutral, and non-ideological (ESEA §8501(a)(2) & §8505)
- Construction, renovation, or repair of any school facility (ESEA §8526(1))
- Transportation (ESEA §8526(2))
- Development or distribution of materials, or operation of programs or instructional courses directed at youth, that are designed to promote or encourage sexual activity (ESEA §8526(3))
- Distribution of legally obscene materials to minors on school grounds (ESEA §8526(4))
- Provision of sex education or HIV-prevention education in schools, unless that instruction is age-appropriate and includes the health benefits of abstinence (ESEA §8526(5))
- Operation of a contraceptive distribution program in schools (ESEA §8526(6))