



## Determining Allowability of Title IV, Part A Activities

### Understanding the Allowability of Title IVA Activities

When considering how to spend Title IV, Part A (Title IVA) funds, the district or consortium of districts<sup>1</sup> should first evaluate the needs of their students and educators. For a district receiving a current year total district allocation<sup>2</sup> of \$30,000 or more, this includes aligning Title IVA activities to the results indicated in the required comprehensive needs assessment. The second consideration should be how to supplement (i.e., create, expand) current educational programming, activities, and/or training related to the three content areas: well-rounded educational opportunities, safe and healthy students, and effective use of technology.

After deciding how to supplement current offerings, the district's next consideration should be what is required to meet the intended outcomes (e.g., additional staffing, supplies). Finally, the district should ensure that the proposed activity meets the requirements of the Determining Allowability of Proposed Title IVA Activities section below.

### Determining Allowability of Proposed Title IVA Activities

In determining whether an activity, program, or training is allowable under Title IVA, the Iowa Department of Education considers the following questions. We recommend that districts use these considerations when determining their budgets for the current school year.

1. Is the proposed expenditure consistent with the purpose of at least one of the three content areas of the Title IVA program?
  - a. The purpose of the Title IVA program is to improve students' academic achievement by increasing the capacity of the Iowa Department of Education, school districts, and local communities to improve:
    - i. Access to, and opportunities for, a **well-rounded education** for all students;
    - ii. School conditions for student learning to create a healthy and safe school environment (**safe and healthy students**); and
    - iii. Access to personalized learning experiences supported by technology and professional development for the **effective use of technology** and data.
2. Is the proposed expenditure consistent with the purpose of the Title IVA?
  - a. The intent of the Title IVA program is not to buy items but, instead, create and/or provide supplemental educational programs, activities, and training to improve students' academic achievement in the three content areas.

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<sup>1</sup> From this point forward, "district" should be taken to mean "district or consortium of districts."

<sup>2</sup> The total district allocation includes the district share and, if applicable, the nonpublic equitable share(s).

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- b. Supplies are only allowable if they can be tied directly to the implementation of the proposed program. In other words, supplies are allowable, if the proposed program could not be offered without the supplies.
3. Are the costs allowable under the [Uniform Guidance](#) (2 CFR Part 200, Subpart E)?
    - a. Is the cost reasonable and necessary for performance of the grant?
      - i. Do I really need this? Did my needs assessment indicate this as a need?
      - ii. Is the expense targeted to valid programmatic/administrative need?
      - iii. Is this the minimum amount I need to spend to meet my need?
      - iv. Do I have the capacity to use what I am purchasing?
      - v. If I were asked to defend this purchase, would I be able to?
      - vi. Did I pay a fair rate?
    - b. Is it chargeable to the grant award in proportion to the benefits received by the grant award as a result of the cost?
      - i. 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.
      - ii. A district can only charge in proportion to the value received by the program.
  4. Does the proposed use of funds for the activity supplement what is currently offered?
    - a. If Title IVA funds did not exist, would this activity be otherwise funded by other federal, state, and/or local monies? Or is the proposed use of funds is required by law? If the answer is yes to either of these questions, using Title IVA funds for the activity is not allowable.
  5. Is the activity appropriately categorized?
    - a. Technology infrastructure is defined as devices, equipment, software applications, blended learning software and platforms, digital instructional resources (e.g., textbook substitutes, digital licenses, online subscriptions), initial professional development activities, other one-time information technology purchases (ESEA § 4109(a)(2)(B) & (a)(4)(A)). This is limited to 15% of the total district allocation.
  6. Does all professional development meet the definition under ESSA? If not, is it categorized as technology infrastructure?
    - a. 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)(B)).
  7. Is the activity one of the following prohibited activities?
    - a. “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)).
    - 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).
    - c. Construction, renovation, or repair of any school facility (ESEA § 8526(1)).
    - d. Transportation associated with getting students to and from school (ESEA § 8526(2)).
    - e. 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)).
    - f. Distribution of legally obscene materials to minors on school grounds (ESEA § 8526(4)).
    - g. 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)).
    - h. Operation of a program of contraceptive distribution in schools (ESEA § 8526(6)).

## Additional Guidance

For additional Title IVA guidance, including resources and technical assistance, see the Department’s [Every Student Succeeds Act](#) webpage or contact Hannah Walsh, Consultant for Title IVA, at [hannah.walsh@iowa.gov](mailto:hannah.walsh@iowa.gov).

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