



The Fine Arts and Title IV, Part A

Introduction

The Every Student Succeeds Act (ESSA) became law in December 2015, reauthorizing the Elementary and Secondary Education Act of 1965 (ESEA). Newly authorized under subpart one of Title IV, Part A (Title IVA) of the ESEA is the Student Support and Academic Enrichment (SSAE) program. The SSAE program is designed to improve students' academic achievement by increasing the capacity of the Iowa Department of Education (Department), school districts, and local communities to improve:

- Access to, and opportunities for, a **well-rounded education** for all students;
- School conditions for student learning to create a healthy and safe school environment (**safe and healthy students**); and
- Access to personalized learning experiences supported by technology and professional development for the **effective use of technology** and data.

Guidance Purpose

The purpose of this document is to provide districts, and consortia of districts, guidance on potential opportunities to utilize Title IVA funds to create and/or expand fine arts opportunities, programming, and training in their respective communities. To understand the possible opportunities to integrate the fine arts into Title IVA, this document includes:

- General SSAE guidance regarding the purpose and requirements of Title IVA;
- Opportunities to integrate the fine arts into Title IVA;
- Excerpts from the U.S. Department of Education's non-regulatory guidance, which spotlight two district exemplars; and
- Examples of allowable and unallowable SSAE fine arts activities.

SSAE Program Purpose, Clarifications, and Requirements

Program Purpose

The purpose of the SSAE program is not to buy items but, instead, to create and/or provide supplemental (i.e., new, expanded) educational programs, activities, and training to improve students' academic achievement in the three content areas:

- Well-rounded educational opportunities (ESEA § 4107),
- Safe and healthy students (ESEA § 4108), and
- Effective use of technology (ESEA § 4109).

Important Program Clarifications

Supplies

Supplies are only allowable if they can be tied directly to the implementation of the specific proposed activity. In other words, supplies are allowable if the proposed new or expanded SSAE activity could not be offered without them. In addition, all supplies must be supplemental and educational in nature.

Supplement Not Supplant

All expenditures must meet the supplement not supplant requirement (ESEA § 4110). In other words, if the proposed use of funds for the educational activity, program, or training would have previously been funded by other federal, state, and/or local funds or is required to be funded by law, it is supplanting and unallowable.

Technology Infrastructure

No more than 15% of the total district allocation (which includes the district and, if applicable, nonpublic equitable share(s)) may be spent on technology infrastructure. ESEA section 4109(b) defines technology infrastructure as devices, equipment, software applications, blended learning software and platforms (e.g., textbook substitutes), digital instructional resources (e.g., digital licenses, curriculum, online subscriptions), initial professional development activities, and other one-time information technology purchases.

Professional Development

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)). If they do not meet this threshold, they must be categorized as “Technology infrastructure.”

Program Requirements

A district, or consortium of districts,¹ must complete a number of requirements to participate in the SSAE program. The Department has integrated these steps into the overall ESSA planning and implementation process. In addition to the required actions, this section includes recommended actions to improve program implementation and efficacy. These requirements and recommended actions include:

1. Considering how other federal, state, and/or local funds may be leveraged to achieve the goals of the SSAE program (recommended);
2. Consulting the required stakeholders during application design and development (ESEA § 4106(c)(1));
3. Engaging in nonpublic consultation with appropriate nonpublic school officials if the district has accredited nonpublic schools within its bounds, including submitting the initial nonpublic consultation agreement(s) in the Consolidated Accountability and Support Application’s (CASA) Consolidated Application (ESEA §§ 8501-8504);
4. Conducting a comprehensive needs assessment if receiving a current year allocation of \$30,000 or more prior to, and at least once every three years, to examine needs for improvement in the three content areas prior to receiving a current year allocation (ESEA § 4106(d));
5. Selecting relevant, [evidence-based SSAE activities](#) and aligning SSAE activities with the needs identified in the comprehensive needs assessment if receiving \$30,000 or more in the current year (ESEA § 4109(a));
6. Completing the nonpublic consultation agreement(s) in the CASA if the district has participating nonpublic schools, including finalizing the descriptions of equitable services to be provided by the district to nonpublic schools now that the equitable share is available and, if applicable, transferring equitable shares (ESEA §§ 8501-8504);
7. Filling out the Consolidated Application in the CASA, including completing Title IVA program questions, assurances, and budgets (ESEA § 4106(e)(1)-(2));
8. Submitting an annual report in the CASA regarding the district’s progress toward meeting the outcomes identified in the prior year’s Title IVA application (ESEA § 4106(e)(2)(F));
9. Developing an implementation plan, informed by input from stakeholders, to set up the district for successful implementation (recommended);
10. Implementing SSAE activities by collecting information and data about how implementation of the SSAE activities are working (i.e., performance monitoring, rigorous evaluation) and make necessary changes along the way (recommended);

¹ From this point forward, “district” should be taken to mean “district or consortium of districts.”

Iowa Department of Education guidance should be viewed as advisory unless it’s specifically authorized by state statute, according to Iowa Code section 256.9A as enacted by Senate File 475. This does not apply to administrative rules, declaratory orders, or materials required by federal law or courts.

11. Continuing consultation with the required stakeholders during implementation of selected SSAE activities to improve SSAE activities and coordinate implementation with other related community activities (ESEA § 4106(c)(2));
12. Filing reimbursement claims quarterly in the CASA; and
13. Evaluating the effectiveness of the SSAE activities for inclusion in the next year’s annual report in the CASA (ESEA § 4106(e)(2)(F)), including examining how the activity is working and using the information and data collected to decide about mid-course correction and next steps.

For a more detailed list of these actions, see the Required and Recommended Actions section of the [Title IVA Executive Summary](#).

Opportunities for Utilizing Title IVA Funds for New or Expanded Fine Arts Activities

There are several opportunities to integrate the fine arts into all three of the content areas of the SSAE grant. These opportunities are described below in their respective sections.

Well-Rounded Educational Opportunities (ESEA § 4107)

The Well-Rounded Educational Opportunities section of the grant states that funds must be used to “develop and implement programs and activities that support access to a well-rounded education and that are coordinated with other schools and community-based services and programs” (ESEA § 4107(a)(1)). In regard to fine arts, these may include:

- “Programs and activities that use music and the arts as tools to support student success through the promotion of constructive student engagement, problem solving, and conflict resolution” (ESEA § 4107(a)(3)(B));
- “Programming and activities to improve instruction and student engagement in science, technology, engineering, and mathematics, including computer science, (referred to in this section as ‘STEM subjects’) such as integrating other academic subjects, including the arts, into STEM subject programs to increase participation in STEM subjects, improve attainment of skills related to STEM subjects, and promote well-rounded education” (ESEA § 4107(a)(3)(C)(vi));
- “Programs and activities that support educational programs that integrate multiple disciplines, such as programs that combine arts and mathematics” (ESEA § 4107(a)(3)(I)); and
- “Other activities and programs to support student access to, and success in, a variety of well-rounded education experiences” (ESEA § 4107(a)(3)(J)).

Safe and Healthy Students (ESEA § 4108)

The Safe and Healthy Students section of the grant states that funds must be used to “develop, implement, and evaluate comprehensive programs and activities that are coordinated with other schools and community-based services and programs; foster safe, healthy, supportive, and drug-free environments that support student academic achievement; [and] promote the involvement of parents in the activity or program” (ESEA § 4108(1)-(3)). Potential opportunities to integrate the fine arts into this section include creating and/or expanding fine arts programming that promotes students’ physical and mental health, dropout prevention, trauma recovery, or social-emotional skills (e.g., resilience, perseverance, self-management, empathy).

Effective Use of Technology (ESEA § 4109)

The Effective Use of Technology section of the grant states that funds must be used to “improve the use of technology to improve the academic achievement, academic growth, and digital literacy of all students, including by meeting the needs of such agency or consortium that are identified in the needs assessment conducted... (if applicable)” (ESEA § 4109(a)). A potential opportunity to integrate the fine arts into this section is by providing ongoing professional development to support the effective use of technology in delivering fine arts instruction.

Title IVA Activity Exemplars

The U.S. Department of Education's 2016 non-regulatory guidance spotlights innovative uses of Title IVA funds.² In regard to fine arts opportunities, the U.S. Department of Education provided two exemplars. The first being around the integration of arts into STEM programming and the second regarding expansion of music and arts opportunities in Boston's public schools.

Integrating the Arts into STEM Subject Programs (ESEA § 4107(a)(3)(C)(vi))

Studies show that prekindergarten and kindergarten students whose teachers integrated music and arts with STEM curricula and lessons experienced significant increases in math learning. For example, the [Early STEM/Arts project](#) of the Wolf Trap Early Learning Institute paired teachers with Wolf Trap teaching artists to receive intensive professional development in applying arts-integrated techniques to math curricula. The artists visited teachers' classrooms for in-class sessions with the students and transitioned from classroom leaders to coaches as the teachers gained skills in integrating music, dance, and drama into their own instruction. An [independent study](#) found that students in the classrooms of teachers who participated in the Early STEM/Arts program received the equivalent of 1.7 additional months of learning, or 34 additional days, compared to their peers in the control groups. (U.S. Department of Education, 2016, p. 20)

Music and Arts Programs and Activities (ESEA § 4107(a)(3)(B))

Many schools and districts are implementing programs that have made the arts part of a well-rounded education for all students. In Boston, school district and city leaders have embarked on a revitalization of the arts throughout the district in order to close a longstanding "arts opportunity gap." For example, at [Otis Elementary School](#), where the student body is 80% Hispanic and more than 90% are eligible for free and reduced-price lunch, the arts are a critical component of the school's vision for success. In the initial data collected for the [Boston Public Schools Arts Expansion initiative](#), Otis Elementary was providing some visual arts and music but wanted to ensure access for all students and provide additional arts disciplines. Through the Arts Expansion Initiative, in 2011 the school began adding arts disciplines by engaging in partnerships and hiring additional arts teachers. Arts integration collaborations between arts specialists and classroom teachers focused on making content connections across the curriculum. Partnerships with local arts institutions broadened students' artistic horizons and deepened their learning. A number of indicators have improved at the school, which could possibly be attributed to the arts expansion initiative. In the 2015-16 Student Climate Survey, Otis Elementary outscored other elementary schools in six of seven indicators and had a 94.8% attendance rate in 2014-15. Since its arts expansion, student proficiencies on the Massachusetts Comprehensive Assessment System in English language arts and mathematics have increased, and the school has moved from tier 3 to tier 2 in the district accountability and assistance levels. (U.S. Department of Education, 2016, pp. 20-21)

Examples of Fine Arts Activities: Allowable and Unallowable

When considering how to spend Title IVA funds, the district should first evaluate the needs of their students and educators. For a district receiving a current year total district allocation 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.

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](#).

² 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>

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Allowable Uses of Title IVA Funds

Proposed Use	Explanation of Allowability
Paying the salary of a new dance teacher so additional dance classes may be added to the district's curricular options.	The proposed use is allowable because the dance teacher is a new hire and allows the district to expand its curricular options.
Creating a new after-school drama club. Funds are needed for supplies and staffing.	The proposed use is allowable as it creates a new arts enrichment activity, thereby expanding well-rounded learning opportunities for students. Because the new after-school drama club is new, the program requires supplies and staff to implement it successfully.
Expanding the current programmatic offerings available to students to effectively teach the growing number of students enrolled in music courses. In order for these supplemental offerings to be successful, the district requires funds to purchase additional musical instruments.	New musical instruments are an allowable use of Title IVA funds because they address a programmatic need and the new educational offerings could not be offered without them.
Providing additional ceramic/sculptural learning opportunities and access. Equipment required for the successful implementation of these offerings includes the purchase of new kilns in three buildings. Currently, the kilns in these buildings are unusable and would not have been purchased in the absence of these funds.	New kilns are an allowable use of funds because they will ensure more students have access to ceramic/sculptural learning opportunities in their art curriculum. In addition, the new educational offerings could not be offered without them.
Sending two music educators to the Iowa Fine Arts Education Summit, a two-day conference. Funds will cover registration and lodging.	Professional development is allowable under Title IVA but one-day, stand-alone professional development is limited to 15% of the total district allocation (i.e., technology infrastructure).
Implementing the new recommended fine arts standards by creating the district's own standards, engaging in ongoing professional development to effectively implement the standards, and purchasing materials required for successful implementation.	Iowa's Fine Arts Standards are part of Iowa's Academic Standards and are embedded within the Iowa's ESSA plan. Using Title IVA funds to support the implementation of the new recommended standards is allowable because the standards are not required to be implemented and the implementation of the standards will supplement and strengthen the district's fine arts offerings.

Unallowable Uses of Title IVA Funds

Proposed Use of Title IVA Funds	Explanation of Unallowability
Paying half of a current music teacher's salary.	This proposed use is unallowable because the music teacher's salary is already being paid in full by other funds. Using Title IVA funds to support an existing position, whether it be in part or in full, is supplanting and unallowable.
Paying a substitute to cover a class while the educator attends a Title IVA-related professional development opportunity.	This does not meet the purpose of these funds, as it does not supplement the current educational activities, programming, or training.
Purchasing supplies, equipment, and property (e.g., uniforms, music, musical instruments, software) without adding or expanding fine arts activities or programming.	Without adding additional programming or activities, solely purchasing supplies, equipment, and property is unallowable. Supplies are only allowable if they can be tied directly to the implementation of the specific proposed program. In other words, supplies are allowable, if the proposed new or expanded program could not be offered without the supplies.
Using funds for transportation associated with getting students to and from school.	ESEA section 8526(2) prohibits the use of Title IVA funds on regular day transportation.
Utilizing funds to support religious worship or instruction or any educational service, including equipment and materials, that is not secular, neutral, and non-ideological.	ESEA sections 8501(a)(2) and 8505 prohibit the use of Title IVA funds on any religious worship, instruction, or any educational service—including equipment and materials—that is non-secular, biased, and ideological.
Using funds for construction, renovation, or repair of any school facility.	ESEA section 8526(1) prohibits the use of Title IVA funds on construction, renovation, or repair of any school facility.

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.