



## Title IV, Part A Guidance

### Student Support and Academic Enrichment Subgrants

## Introduction

The Every Student Succeeds Act (ESSA) became law in December 2015, reauthorizing the Elementary and Secondary Education Act of 1965 (ESEA). This reauthorization created the Student Support and Academic Enrichment (SSAE) program under Title IV, Part A, Subpart 1 (Title IVA) of the ESEA. The purpose of this document is to guide local education agencies (LEAs) in understanding the subgrant program and its requirements. Specifically, this guidance is organized around the following areas:

- Subgrant Requirements by Total Amount Available;
- Comprehensive Needs Assessment;
- Leveraging SSAE Resources;
- Nonpublic Consultation and Equitable Services Requirements;
- Application Requirements;
- Allowable Activities; and
- Questions and Additional Guidance.

## Program Purpose and Intent

The purpose of the SSAE program is to improve students' academic achievement by increasing the capacity of the Iowa Department of Education (Department), school LEAs, and local communities to improve in the three content areas:

- Access to, and opportunities for, a **well-rounded education** for all students (ESEA § 4107);
- School conditions for student learning to create a healthy and safe school environment (**safe and healthy students**; ESEA § 4108); and
- Access to personalized learning experiences supported by technology and professional development for the **effective use of technology** and data (ESEA § 4109).

*The intent is to provide additional educational opportunities in the three content areas, not to buy items.*

## Subgrant Requirements and Recommended Actions by Total Amount Available

To participate in the SSAE subgrant program, the LEA or consortium of LEAs (here forward "LEA") must complete a list of requirements in the [Consolidated Application for ESEA Title Programs](#), which is located in the Consolidated Accountability and Support Application's (CASA). Among these requirements, the LEA must submit a program application by October 15 of each year and reimbursement claims each quarter. Table 1 outlines the Title IVA program requirements, along with recommended actions to improve program implementation and efficacy, by the LEA's Total Available amount in the CASA system:

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*Carryover (LEA Amount for Public Equitable Services) + Current Year Allocation (LEA Amount for Public Equitable Services + LEA Amount for Nonpublic Equitable Services) + Transferred In - Transferred Out*

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Table 1. Dates, Actions, Resource, and Applicability by Total Amount Available in the CASA System.

ESEA Citation	LEA Action	Total Available is less than \$30,000	Total Available is \$30,000 or more
4106(d)	<p><b>Conduct a comprehensive needs assessment prior to the completion of the upcoming school year’s program application</b> (recommended to occur prior to March 15), <b>and subsequent needs assessments at least once every three years, to examine needs for improvement in the three content areas:</b></p> <ul style="list-style-type: none"> <li>• Well-Rounded Education,</li> <li>• Safe and Healthy Students, and</li> <li>• Effective Use of Technology (see the following Comprehensive Needs Assessment section).</li> </ul>	Recommended for the LEA and its eligible <sup>1</sup> nonpublic schools	Required for the LEA and its eligible nonpublic schools
8501(c)	<p><b>Engage in timely and meaningful consultation with the appropriate nonpublic school administrators within the LEA and complete the nonpublic consultation agreement for the upcoming school year by March 15.</b> For additional information on the equitable services procedure and process, see the following Nonpublic Consultation and Equitable Service Requirements section and the <a href="#">Equitable Services for Nonpublic School Students section of the ESSA Guidance and Allocations page</a>.</p>	Required if the LEA has an eligible nonpublic school within boundaries	Required if the LEA has an eligible nonpublic school within boundaries
4106(a)(1)	<p><b>Consider how other funds may be leveraged with Title IVA funds to achieve the goals of the SSAE program</b> prior to the completion of the consortium participation survey. <b>Indicate whether the LEA will participate in a consortium of LEAs</b> in accordance with section 4106(b) <b>in the consortium participation survey due in July</b> (see the following Leveraging SSAE Resources section).</p>	Required	Required
4106(c)(1)	<p><b>Consult the required stakeholders during application design and development</b> (i.e., prior to the completion of the application). Such stakeholders must include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Parents;</li> <li>• Teachers;</li> <li>• Principals;</li> <li>• Other school leaders<sup>2</sup>;</li> <li>• Specialized instructional support personnel (e.g., school counselors, social workers, psychologists, nurses, speech pathologists, librarians);</li> <li>• Students;</li> <li>• Community-based organizations;</li> </ul>	Required	Required

<sup>1</sup> For a nonpublic school’s students, teachers, and other educational personnel to be eligible for equitable services in the upcoming school year, the nonpublic school must be accredited (state, independently, or specially), nonprofit, and in its second year of operation.

<sup>2</sup> The term “school leader” means principal, assistant principal, or an individual who is both an employee of an elementary school or secondary school; and responsible for the daily instructional leadership and managerial operations in the elementary or secondary school (ESEA § 8101(44)).

ESEA Citation	LEA Action	Total Available is less than \$30,000	Total Available is \$30,000 or more
	<ul style="list-style-type: none"> <li>Local government representatives (e.g., law enforcement agencies, juvenile courts, child welfare agencies, public housing agencies);</li> <li>Indian tribes or regional tribal organizations (if applicable);</li> <li>Charter school teachers, principals, and other school leaders (if applicable); and</li> <li>Others with relevant, demonstrated expertise in programs and activities designed to meet Title IVA's purpose.</li> </ul>		
4109(a)	<b>Select relevant, evidence-based SSAE activities that align with the needs identified in the comprehensive needs assessment prior to the completion of the program application</b> (see the <a href="#">Using Evidence to Strengthen Education Investments [Using Evidence] guidance</a> ).	Recommended unless selecting an "evidence-based" activity	Required
8501(c)	<b>Before completing the Allocations and Transfers screen, the LEA must complete and submit the reopened nonpublic consultation agreement for the head administrator's review. The head administrator must confirm the accuracy of the agreement by October.</b>	Required if the LEA has a nonpublic consultation agreement in "Action Required of LEA" status <sup>3</sup>	Required if the LEA has a nonpublic consultation agreement in "Action Required of LEA" status
5103(b)	<b>Complete the Allocations and Transfers screen ("transfers" are in use only, funds do not actually move accounts) by October</b> (see the following Allocations and Transfers section).	Required	Required
4106(e)(1)-(2)	<b>Complete and submit the program application in the Consolidated Application, including completing Title IVA program questions, assurances, and budgets by October 15</b> (see the following Application Requirements section).	Required	Required
8501(c)	<b>Continue to engage in meaningful consultation with the appropriate nonpublic school administrators throughout implementation and assessment of the activities to ensure effective implementation and service delivery.</b> For additional information, see the following Equitable Services Requirements section and the <a href="#">Equitable Services for Nonpublic School Students section of the ESSA Guidance and Allocations page</a> .	Required if the LEA has a participating nonpublic school within boundaries	Required if the LEA has a participating nonpublic school within boundaries
	<b>Develop an implementation plan, informed by input from stakeholders, to set up the LEA for successful implementation after application approval</b> (see the <a href="#">Using Evidence Guidance</a> ).	Recommended	Recommended
4106(e)(2)(F)	<b>Implement SSAE activities by collecting information and data about how the implementation of the SSAE activities is working (i.e., performance monitoring, rigorous evaluation)</b>	Required for annual report	Required for annual report

<sup>3</sup> While the Department does not require LEAs to act on an agreement with a "State Received - Submission Final" status, the LEA may request to re-open the consultation agreement to make edits to the service descriptions. *Iowa Department of Education guidance should be viewed as advisory unless it is specifically authorized by state statute, according to Iowa Code section 256.9A. This does not apply to administrative rules, declaratory orders, or materials required by federal law or courts.*

ESEA Citation	LEA Action	Total Available is less than \$30,000	Total Available is \$30,000 or more
	and make necessary changes along the way (see the <a href="#">Using Evidence guidance</a> ).		
4106(c)(2)	Continue consultation with the required stakeholders during the implementation of selected SSAE activities to improve such activities and coordinate implementation with other related community activities.	Required	Required
4106(a)(1)	Complete and submit the first quarter reimbursement claim for Title IVA in the CASA system between November 1 and November 30.	Required	Required
4106(a)(1)	Complete and submit the second quarter reimbursement claim for Title IVA in the CASA system between January 1 and January 31.	Required	Required
4106(a)(1)	Complete and submit the third quarter reimbursement claim for Title IVA in the CASA system between April 1 and April 30.	Required	Required
4106(e)(2)(F)	Evaluate the effectiveness of the SSAE activities by the end of June for inclusion in the annual report in the CASA system, including examining how the activity is working and using the information and data collected to decide about mid-course correction and next steps (see the <a href="#">Using Evidence guidance</a> ).	Required	Required
4106(e)(2)(F)	Submit an annual report in the CASA system in July regarding the progress toward meeting the outcomes identified in the current year's Title IVA application.	Required	Required
4106(a)(1)	Complete and submit the fourth quarter reimbursement claim in the CASA system.	Required	Required

## Comprehensive Needs Assessment

The LEA, and its participating nonpublic schools, with a total amount available in the CASA of \$30,000 or more must conduct a comprehensive needs assessment (see the [U.S. Department of Education's comprehensive needs assessment](#)) prior to submitting its application, and subsequent needs assessments at least once every three years, to examine its needs for improvement in the three content areas.

Based on the comprehensive needs assessment results, the LEA with a total amount available of \$30,000 or more must use:

- At least 20% of funds for activities to support well-rounded educational opportunities;
- At least 20% of funds for activities to support safe and healthy students; and
- A portion of funds for activities to support effective use of technology.

If the LEA has a Total Available amount of less than \$30,000, it must only meet one of the content area requirements. For an overview of requirements by funding level, see Table 2.

Table 2. Funding Level Requirements for LEAs and Consortia by Total Amount Available in the CASA System.

Requirement	Total Available is less than \$30,000	Total Available is \$30,000 or more
Comprehensive Needs Assessment	<b>Recommended</b> to identify local needs to improve student outcomes.	<b>Required</b> prior to completing application, and subsequent needs assessments at least once every three years, and at least once every three years.
Funding Requirements	Based on the results of the assessment, use <b>at least one</b> of the following: <ul style="list-style-type: none"> <li>At least 20% of funds for activities related to well-rounded educational opportunities (ESEA § 4107);</li> <li>At least 20% of funds for activities related to safe and healthy students (ESEA § 4108); and/or</li> <li>A portion of funds for activities related to effective use of <i>technology</i>* (ESEA § 4109).</li> </ul>	Based on the results of the needs assessment, use <b>all</b> of the following: <ul style="list-style-type: none"> <li>At least 20% of funds for activities related to well-rounded educational opportunities (ESEA § 4107);</li> <li>At least 20% of funds for activities related to safe and healthy students (ESEA § 4108); and</li> <li>A portion of funds for activities related to effective use of <i>technology</i>* (ESEA § 4109).</li> </ul>

\*No more than 15% of the total amount available may be spent on technology infrastructure. Technology infrastructure is defined as property, devices, equipment, software applications, blended learning software and platforms, digital instructional resources (e.g., textbook substitutes, digital licenses, online subscriptions), initial professional development activities, and other one-time information technology purchases.

## Leveraging SSAE Resources

The Department awards SSAE subgrants to all LEAs by formula in the same proportion as the LEA’s prior year’s Title I, Part A allocation. It is important to note that SSAE funds may not be sufficient to independently fund many of the innovative activities discussed. To maximize the use of the SSAE program resources, leaders should consider how other federal, state, and local funds may be leveraged to achieve the goals of the SSAE program. Examples include:

- **Applying for funds as a consortium of school LEAs.** Working together, LEAs may be able to deliver services more efficiently through economies of scale that enable them to serve more students at lower cost and reduce administrative overhead (see the following Applying as a Consortium of School LEAs section for more information).
- **Partnering with organizations (e.g., nonprofits, institutions of higher education, community organizations) or other federal subgrantees.** For example, collaborating with Iowa’s AmeriCorps subgrantees that provide similar programs or services in low-income schools and communities.
- **Coordinating and strengthening complementary services.** For example, Title IV, Part B funding also provides opportunities for academic enrichment through an array of programs and activities.
- **Using funds in conjunction with other ESEA titles to support specific interventions, activities, or services.** For example, using Small, Rural School Achievement Program or the Rural and Low-Income School Program funds for SSAE allowable activities.

## Nonpublic Consultation and Equitable Service Requirements

The law requires each LEA with an eligible nonpublic school within its boundaries to engage in timely and meaningful consultation with the appropriate nonpublic school officials before providing special, equitable educational services and other benefits—or those that are equitable to those provided to its public school students, teachers, and other educational personnel—to eligible nonpublic school students, teachers, and other educational personnel (here forward “nonpublic students”) that may address their identified needs (ESEA § 8501(a)(1)).

## Consultation Requirements (ESEA § 8501(c))

The nonpublic consultation must be:

- Timely and meaningful (e.g., provides nonpublic school officials with adequate notice of consultation to ensure those involved will be well-prepared with the necessary information and data for decision-making, focuses on specific student needs, provides ample time and a genuine opportunity for all parties to express their views);
- Between representative parties that possess the authority to act on behalf of the LEA or nonpublic school and seek to reach agreement on how to provide equitable and effective programs for eligible accredited nonpublic school students;
- Documented and provided to the state-designated ombudsperson through the Nonpublic Consultation Agreement in the CASA system; and
- Maintained in the LEA's records (ESEA § 8501(c)).

For more information on the appropriate equitable services timeline, review the [Equitable Services Procedures and Process guidance](#).

## Equitable Service Requirements

If the nonpublic school wishes its eligible nonpublic students to participate in the Title IVA program, the LEA must provide those students with special Title IVA-related educational services and other benefits that are equitable in comparison to the services and other benefits provided to public school students, teachers, and other educational personnel participating in the Title IVA program (ESEA § 8501(a)(3)(A)). In its planning and provision of services, the LEA must:

- **Maintain control of the public funds (ESEA § 8501(d)).** It cannot delegate its oversight and implementation responsibilities to the nonpublic school or its officials (nor pay or reimburse the nonpublic school or its staff to provide equitable services).
- **Make the final decisions regarding—**
  - **Which equitable services it will provide based on the specific educational needs identified;** and
  - **The method by which services will be provided** (i.e., directly, indirectly through third-party vendors or another independent entity; 34 C.F.R. § 200.64(b)(4)).
- **Use Title IVA funds to address the specific nonpublic student needs.** The LEA cannot use the funds to address general needs or benefit the nonpublic school (34 C.F.R. § 299.8(b)).
- **Only provide eligible nonpublic students Title IVA educational services and other benefits, including equipment and materials, that are:**
  - **Secular, neutral, and non-ideological** (ESEA § 8501(a)(2));
  - **Supplemental** (i.e., be in addition to what is required to be offered and what is currently offered, meet supplement not supplant; ESEA § 8501(a)(2)); and
  - **Consistent with one or more allowable Title IVA activities.**
- **Ensure all funds comply with the subgrant requirements,** including the LEA's amount reserved for nonpublic equitable services to eligible nonpublic students (see the following Equitable Services and Subgrant Requirements section).

For more information on the appropriate equitable services timeline, review the [Equitable Services Procedures and Process guidance](#).

## Equitable Services and Subgrant Requirements

When the law requires the LEA to meet certain requirements in the use of the funds (e.g., funding requirements, comprehensive needs assessment requirement) all the funds subject to the requirements must meet those obligations. In order to be truly equitable in the use of those funds between the public and nonpublic students, the requirements apply to the entire Title IVA allocation—which includes both the LEA's amount for equitable services to public students and its amount reserved for equitable services to nonpublic

students (ESEA § 8501(4)(A)). The LEA may determine that it will use its amount reserved for nonpublic equitable services toward one content area under Title IVA, which does not require the services to be used per the Title IVA legal requirements. In doing so, it must use its amount reserved for public equitable services to meet the minimum requirements of the law.

## Application Requirements

### Allocations and Transfers

A school LEA must complete the Allocations and Transfers page and submit it to the Department in the CASA system by October 1. In the collection, the LEA may transfer all, or any lesser amount, of its Title IVA allocation (which includes both the LEA amounts for public and nonpublic equitable services) to one or more of the following programs for the fiscal year:

- Title I, Part A;
- Title I, Part C;
- Title I, Part D, Subpart 2;
- Title II, Part A;
- Title III, Part A (English Learners);
- Title III, Part A (Immigrant); and
- Title V, Part B.

### Program Application

A school LEA must submit a Title IVA application to the Department in the CASA system by October 15 to receive its SSAE program allocation. This application consists of three required components:

1. Program Assurances;
2. Program Questions, which must align with the budget; and
3. Program Budget, which must align with the questions.

The content of the application is available on the [Consolidated Application for ESEA Title Programs page](#).

### Applying as a Consortium of School LEAs

A school LEA may apply for funds in consortium with one or more surrounding LEAs. If the LEA wishes to form a consortium, it must indicate this intent and provide the name of each LEA that will participate in the consortium, including the fiscal agent, in the Title IV, Part A – Consortium Participation survey in the CASA system by July 15.

## Allowable Activities

Table 3 provides examples of activities school LEAs may consider as they prepare for SSAE program implementation. Allowable uses of funds under each of the three content areas may include (but are not limited to):

- Direct services for students,
- Professional development for educators,
- Salaries of personnel to carry out the identified supplemental programs and services, and
- Supplemental educational resources and equipment.

### Note on Determining Allowability

It is important to understand that allowability is dependent on several factors specified in the ESEA. For guidance, see the [Determining Allowability of Title IVA Activities Guidance](#) on the [ESSA Guidance and Allocations page](#).

Table 3. Examples of Allowable SSAE Uses\*

Well-Rounded Education	Safe and Healthy Students	Effective Use of Technology
<ul style="list-style-type: none"> <li>● World language instruction</li> <li>● Fine arts instruction</li> <li>● Science, technology, engineering, and mathematics (STEM), including computer science</li> <li>● Social studies instruction</li> <li>● College and career counseling</li> <li>● Social emotional learning</li> <li>● Accelerated learning programs, including dual or concurrent enrollment and Advanced Placement or International Baccalaureate</li> </ul>	<ul style="list-style-type: none"> <li>● Preventing bullying and harassment</li> <li>● School dropout prevention</li> <li>● Re-entry programs and transition services for justice-involved youth</li> <li>● Suicide prevention</li> <li>● Evidence-based drug and violence prevention</li> <li>● Health and safety practices in school athletic programs</li> <li>● Evidence-based school-based health and mental health services</li> <li>● Healthy, active lifestyle education</li> <li>● Mentoring and school counseling</li> <li>● Schoolwide positive behavioral interventions</li> </ul>	<ul style="list-style-type: none"> <li>● Innovative blended learning projects</li> <li>● Technological capacity and infrastructure (15% cap)</li> <li>● Specialized or rigorous academic technological courses and curricula, including digital learning and assistive technologies</li> <li>● Professional learning tools, devices, content, and resources to personalize learning and improve academic achievement</li> </ul>

\*This table is not exhaustive. Please consult the [statute](#) for more information.

### Supplement, Not Supplant

The LEA must use Title IVA funds to “supplement, and not supplant, non-Federal funds” that it would otherwise use for Title IVA activities (ESEA § 4110). In other words, the LEA is supplanting if the proposed use of funds for the educational activity or program—

- Is currently funded by a non-Title IVA funding source;
- Would have previously been funded by another funding source that still exists; or
- Is required to be funded by law.

### Questions and Additional Guidance

For program contact information and resources, please see the Department’s [ESSA Guidance and Allocations](#) and [Consolidated Application for ESEA Title Programs Requirements and Deadlines](#) pages.