TITLE IV-A COALITION

U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202
Attn: Director of the Information Collection Clearance Division

February 24, 2020

RE: Study of District and School Uses of Federal Education Funds, Docket ID: ED-2019-ICCD-0160

On behalf of the Title IV-A Coalition, the undersigned organizations are writing in response to the U.S. Department of Education's (the Department's) request for comments for Study of District and School Uses of Federal Education Funds, which includes data collection on use of funds for the Student Support and Academic Enrichment grant program under Title IV-A of ESSA. Collectively, our organizations represent dozens of diverse organizations whose members utilize these funds to support safe and healthy schools, a well-rounded curriculum, and the effective use of technology. We are pleased to submit the following comments in support of collecting Title IV-A survey data.

(1) **Our organizations believe that the data collection for the Survey on the Title IV-A use of funds is a necessary and proper function of the Department and should be undertaken.**

While there are no requirements for states or districts to report on the use of funds under Sec. 4001, Subpart 1 of Title IV-A of the Elementary and Secondary Education Act (ESEA), we believe that the collection of this information is absolutely necessary to determine the effectiveness of this grant and to aid the department in its proper implementation. Given the flexibility under Title IV-A, districts have the opportunity to spend these funds across a wide range of evidence-based programs and activities. Due to the immense flexibility granted by this law, the effectiveness of Title IV-A as a whole can only be determined by the large-scale collection of data, a task which the United States Department of Education is in the best position to accomplish.

We view the need for Title IV-A block grant reporting and data collection as just as important as the need for Title II-A grant reports. Indeed, the Department's Title II-A surveys have long served as the only readily available data analysis for Congress, state governments, constituents, researchers and other key stakeholders about the uses of these investments. In fact, the data collected by the Department about the use of Title II-A funds proved critical to Congress in enacting a law that helped identify and address the fact that only 4% of funds were being

directed for principals, resulting in Congress passing a law allowing states to reserve funding for that purpose. In the same vein, we believe that data collected by the Department on Title IV-A would be the only scientifically reliable national data and information about how program funds are being used across every district. Such data would be critical for Congress to see whether and how these funds are affecting schools, students and educators, allowing Congress to make informed decisions about funding or policy changes.

Given the breadth of the activities supported by Title IV-A, the data collected would be essential to establishing whether districts are using their funds appropriately and effectively to support the three broad areas under the program: safe and healthy schools, a well-rounded curriculum, and the effective use of technology. It would also serve as foundational data for determining whether these funds are supporting evidence-based programs with a proven record of improving school climates and enriching the learning environment in schools. For these reasons, we strongly urge the Department to launch an ongoing collection of Title IV-A data in order to ensure that states and local school districts are implementing programs consistent with the new provisions under the law and to help stakeholders gain knowledge on the uses of these investments.

> **(2) In order to enhance the quality of information being collected that is reflective of the breadth of activities funds may be spent on, our organizations strongly urge the Department to take a balanced approach in the data collection by collecting specific information about the use of funds while offering a myriad of choices districts can select.**

We recognize that measuring effectiveness of new or scaled up initiatives takes time and intended outcomes are not always apparent after the first or second year of implementation. Bearing those concerns in mind, we urge the Department to gather as specific information as is practicable related to how states and districts are investing their Title IV-A dollars to a) increase access to well-rounded curriculum; b) support safe and healthy students; and c) increase the effective use of technology *and* data related to specific outcomes associated with the programming supported by Title IV-A. We offer the following suggestions for data the Department could collect, or encourage states to collect, which demonstrates the value of Title IV-A and the programming and services it helps support.

Suggested Survey Questions:
Did you combine Title IV-A Dollars with other local/state/federal funding streams to carry out Title IV-activities?

Did you Transfer Title IV-A dollars to a different Title?
If yes, which Titles?

How are states and districts using Title IV-A dollars?

1. **For states and districts**: what percentage of Title IV-A funds were used to: a) increase access to well-rounded curriculum; b) support safe and healthy students; and c) increase the effective use of technology?

2. **For states**: The law allows you to reserve up to five percent of funds to provide technical assistance, training, and other types of support to assist districts in increasing access to a well-rounded curriculum, supporting safe and healthy students, and increasing the effective use of technology. Please describe how you used this allocation to support local school districts.

3. **For districts**: Was your district required to complete a needs assessment?
    a. If yes**,** who was involved in the needs assessment process? Please check all that apply:
        1. Principals/Administrators
        2. Parents/families
        3. Teachers
        4. Specialized instructional support personnel
        5. Community-based organizations
        6. Local Government Representatives
        7. Faith based institutions
        8. Indian Tribes or Tribal Organizations
        9. Nonprofit Organizations
        10. Other: Please explain

    b. What three specific items did your district determine to be its greatest needs? (e.g., technology professional development, AP/IB courses, anti-bullying programs, etc.)

4. **For districts**
    a. **Specifically, how (if at all) did you invest your Title IV-A dollars to increase access to a well-rounded curriculum? Please check all that apply. (suggested options below)**
        1. Expand STEM courses and provide hands-on learning opportunities in STEM including computer science
        2. Support the participation of students in STEM nonprofit competitions (such as robotics, science research, invention, mathematics, computer science, and technology competitions) and integrate classroom based and afterschool and informal STEM instruction
        3. Integrate other academic subjects, including the arts, into STEM subject programs or create or enhance STEM specialty schools
        4. Partner with external institutions, such as museums, to increase access to a well-rounded curriculum
        5. Implement or expand environmental education
        6. Implement or expand health education

7. Increase availability of music education in a variety of offerings (band, orchestra, vocal, etc.) and access/purchase of instruments to enhance music education offerings
8. Make arrangements to provide off-site music education learning opportunities, such as competitions, festivals, and ensemble adjudications
9. Make minor enhancements to performance, rehearsal, labs, and physical education facilities
10. Provide increased health and physical education programs.
11. Provide or expand after school programming
12. Provide college and career counseling to students
13. Offer AP and/or IB courses
14. Other: Please explain

b. **Specifically, how (if at all) did you invest your Title IV-A dollars to support safe and healthy students? Please check all that apply. (suggested options below)**
   1. Increase access to comprehensive school mental and behavioral health services
   2. Provide professional development in mental health first aid to school staff
   3. Provide professional development in evidence-based crisis response/prevention techniques
   4. Hire school psychologists, school social workers, or school counselors
   5. Implement school nursing/school health programs
   6. Implement strategies to improve school climate
   7. Implement school safety trainings for educators and students
   8. Improve trauma informed services
   9. Implement violence prevention programs/curricula
   10. Implement suicide prevention programs/curricula
   11. Implement substance abuse prevention programs/curricula
   12. Implement positive discipline strategies (e.g PBIS, restorative justice)
   13. Implement anti-bullying and/or cyberbullying programs/curricula
   14. Increase mental health services access for students with disabilities
   15. Offer social-emotional learning curricula
   16. Offer physical activity opportunities
   17. Offer club, intramural, or team sports
   18. Increase availability of physical education classes
   19. Increase availability of health education classes
   20. Other: Please explain

c. **Specifically, how (if at all) did you invest your Title IV-A dollars to increase the effective use of technology? Please check all that apply. (suggested options below).**

1. Provide professional development on best practices in instructional technology
2. Provide additional instructional support on the effective use of technology for educators
3. Develop/implement personalized learning initiatives
4. Purchase digital tools and services
5. Discover/adapt high quality resources
6. Implement OER initiatives (as separate from discovering/adapting high quality resources)
7. Offer specialized/rigorous coursework through technology
8. Provide technology and coursework access to remote/rural/underserved areas
9. Implement digital citizenship courses and trainings

d. Did you invest your Title IV-A funds in initiatives that support more than one broad of Title IV-A's three areas (e.g. increasing afterschool program offerings related to a well-rounded curriculum and addressing violence prevention).
e. Please provide the approximate percentage breakdown of how you spent your Title IV-A funds in each of the three areas – safe and healthy schools, well-rounded curriculum and educational technology.

5. **For states and districts**: Did you use your Title IV-A dollars:

a. to scale up or expand upon existing initiatives and programs
b. implement new initiatives and programs
c. both scale up existing initiatives and implement new programs

Measures of Effectiveness (or indicators of success)

6. **For districts:** What indicators will you use to demonstrate that your Title IV-A investments helped to improve access to a well-rounded curriculum? (suggested metrics below)
   a. increased participation of the following groups of students: elementary students; girls; and underrepresented minorities in experiential, hands-on STEM+CS
   b. implementation and/or expansion of three-dimensional teaching and learning concepts
   c. increased offerings of music and arts education
   d. increased health and wellness programs for students and faculty
   e. increased number of students taking AP/IB courses

7. **For districts:** What indicators will you use to demonstrate that your Title IV-A investments helped to support safe and healthy students? (suggested metrics below)
   a. reduced ratios school psychologists, school counselors, and social workers
   b. decrease in suspensions and expulsions
   c. reduction in disproportionate effect of certain disciplinary practices

    d.   percentage of students who report being bullied or harassed

    e.   number of staff /students trained in mental health first aid techniques

    f.   number of staff and students provided with suicide prevention training

    g.   percentage of students who indicate they feel safe at school

    h.   number of students who received mental and behavioral supports at school

    i.   collection of chronic absenteeism data

8. **For districts:** What indicators will you use to demonstrate that your Title IV-A investments helped to improve the effective use of technology? (suggested metrics below)
   a. Increase in number of technology specialists
   b. Increase in professional development opportunities for educators
   c. Increased instructional support in the classroom
   d. Increase in number of educators receiving certifications or credentials in educational technology through their PD
      1. What types of certifications/certifications did they earn?
   e. Ability to purchase devices within the 15% cap
   f. Increase in technology courses offered
   g. Increased access to broadband
   h. Increase in number of students with disabilities served by personalized learning/technology
   i. Expanded blended and personalized learning opportunities

On behalf of the Coalition, we are grateful for the opportunity to provide this input and look forward to working with the Department on the successful implementation of the Title IV-A program. Please do not hesitate to contact our Executive Director, Ally Bernstein at ally@bsg-dc.com with any questions.

Sincerely,

Advance CTE	City Year Inc.
Afterschool Alliance	Committee for Children
Alliance for Excellent Education	Communities In Schools
American Federation of School Administrators	CoSN - Consortium for School Networking
American Heart Association	Council of Administrators of Special Education, Inc (CASE)
American Library Association	Educational Theatre Association
American Occupational Therapy Association	Futures Without Violence
American Psychological Association	Girl Scouts of the United States of America
American School Counselor Association	International Society for Technology in Education
Character.org	League of American Orchestras

National Association for College Admission Counseling
National Association for Music Education
National Association of School Nurses
National Association of School Psychologists
National Association of Secondary School Principals
National Center for Learning Disabilities
National Council of Teachers of Mathematics
National PTA
National Science Teaching Association

National Summer Learning Association
School Social Work Association of America
SHAPE America
State Educational Technology Directors Association
STEM Education Coalition
The American Counseling Association
The College Board
Young Audiences, Inc.