

Updated January 27, 2025

Allowable Activities

What activities are allowable under Title IV-A.

Title IV-A is one of the most flexible funding sources available; therefore, most activities are allowable with thoughtful planning. Funded activities must be supplemental services or supports that align with well-rounded education, safe and healthy students or effective use of technology. Activities should be decided upon based on data and student need, stakeholder feedback, alignment with the ESSA tiers of evidence along with a clear plan for outcome evaluation, must be directed to schools and students of greatest need, and must be reasonable and necessary. Title IV-A funds cannot be used to meet state or federal statute requirements. More information on allowable activities can be found [here](#).

Is food an allowable cost?

The only allowable food cost under Title IV-A is for staff in travel status for professional development.

Can these funds be used to support homeless student activities (McKinney-Vento) such as fees and transportation?

Allowable expenditures that would support homeless students might include AP fees or the purchase of or training on an evidence-based program such as *Street Smart*.

Can the funds be used to purchase computers?

Yes, if they are being used for direct student instruction/use and would be coded within the subject of well-rounded education, non-capital equipment. The purchase should be based on a clearly identified need, be directed towards students of greatest need and be considered reasonable and necessary. A district technology plan outlining short- and long-term plans for the purchase and replacement of computers to better understand current and future needs is beneficial in documenting how the purchase of computers are being directed towards students of greatest need. An updated SMARTIE goal aligning with the technology plan can aid in the approval process. Staff computers are not an allowable expense.

Is transportation an allowable expenditure?

Transportation as it relates to an allowable activity within well-rounded education, safe and healthy students and effective use of technology is allowed. The cost of transportation must also be reasonable and necessary for performance of the grant. Bussing costs for the regular school day are not allowable under Title IV-A.

Can school districts use Title IV-A funds to bring in a provider to administer mental health services to students who have experienced trauma?

There are a variety of health and mental health services that may be provided with Title IV-A funds including mental health navigation, school/community co-facilitated groups, and student and family assistance programs. The [School Mental Health funding Expenses 101 Guide](#) provides additional info on allowable costs. All activities paid for with federal funds must be aligned to meeting one or more of the school district's identified needs. 20 U.S.C. § 7118. ESEA 4001(a)(1) requires active parental consent for mental health assessments and services provided with Title IV-A funds.

It is important to note that the direct cost of therapy/counseling, while allowable under Title IV, Part A, should be capped at 20% of the total allocation and services must occur on school property. Students participating in teletherapy must receive services on school property. Note that community mental health providers should be using all channels available to them for reimbursement, including Medicaid and/or private insurance billing. Please see the [Guidelines for using State and Federal Funds to Cover Mental Health and AODA Treatment Costs for Youth](#) for more guidance.

What constitutes a mental health assessment or service?

Under Title IV-A, Parents Right to Know, districts are required to obtain active parental/guardian consent for mental health assessment and services funded with Title IV-A dollars. Mental Health Services include assessment/screening, mental health navigation, school/community co-facilitated groups, etc. *Treatment and therapy to assist an individual or group in alleviating mental or emotional illness, symptoms, conditions, or disorders, while allowed under Title IV-A, must occur on school property and are capped at 20% of the total allocation.* Active consent is required through the agency providing services.

Within comprehensive school mental health, licensed pupil services professionals may, without active consent, support individual or groups of students in increasing access, progress and engagement in the general education curriculum. DPI strongly recommends schools personally engage with families for any supports provided to students beyond what is traditionally provided within the general education curriculum. This guidance supports, but does not supplant guidance from the Protection of Pupil Rights Amendment. Additional resources can be found here:

School Mental Health <https://dpi.wi.gov/sspw/mental-health>
Mental/Behavior Health

Screening <https://dpi.wi.gov/sspw/mental-health/mental/behavioral-health-screening>
Consent and Notification in a Multilevel System of Support

- <https://dpi.wi.gov/sites/default/files/imce/sped/pdf/rti-consent.pdf>

Can An LEA Use Funds To Add An Additional Concrete Pad To A Playground? (DOE response 12/10/2020)

No. The legislation expressly prohibits the use of funds (section 8526(1)) for construction, renovation, or repair of any school facility. These funds may be used for minor remodeling and repair. Minor remodeling refers to minor alterations in a previously completed building. The term also includes the extension of utility lines, such as water or electricity, from points beyond the confines of the space in which the minor remodeling is undertaken but within the confines of the previously completed building. The term does not include building construction, structural alteration to buildings, building maintenance, or repairs.

Can Title IV-A Funds Be Used To Pay The Salary For staff Positions if local funds no longer exist? (DOE response 6.8.2021)

For an LEA to use Title IV-A funds to pay for staff positions, the SEA must first determine if that teaching activity is allowable under Title IV-A – i.e.,

1. Consistent with one of the three content areas;
2. Reasonable and necessary for the performance of the grant;
3. Allocable to the grant;
4. Supplements, and does not supplant, other State or local funds that would otherwise be used to pay for the position; and
5. Not one of the prohibited activities in ESEA Section 4001(b) or Section 8526.

To overcome the presumption of supplanting, the LEA would have to show that it would not otherwise be able to fund the salaries of the staff positions, but for the availability of Title IV-A funds. The LEA would need to provide clear documentation that no state or local funds are available to cover the staff salaries and that the reason for the lack of appropriations is not because federal funds might be available to cover the positions.

Can Title IV-A funds be used to purchase security cameras for school buses or campuses? (DOE response 7.2.2020)

In general, the purchase and installation of security cameras is allowable under the Title IV, Part A program consistent with one of the three main purposes of the statutory program—supporting safe and healthy students. To be funded, these activities should be consistent with the school district’s needs assessment, be a “reasonable and necessary cost,” and be consistent with the local application approved by the SEA in this State-administered program. Title IV, Part A program funds can be used by a school district to purchase security cameras provided that a number of primarily statutorily required considerations are met as described below.

Title IV, Part A is a state-administered formula grant program; therefore, the SEA must review a local district's or LEA's application to determine whether activities proposed by an LEA are allowable, and consistent with the requirements that govern the program. Assuming that the comprehensive local needs assessment (required under ESEA Section 4106 for LEAs with allocations of at least \$30,000) and local stakeholder consultation indicate that security cameras are a significant LEA need, the SEA determines whether such costs meet the purposes of one of the three content areas in the Title IV, Part A program (well-rounded education in section 4107, safe and healthy students in section 4108, or the effective use of technology in section 4109). In this case, security cameras would support the purposes of the safe and healthy students content area as they can foster a safe school environment. (See ESEA Section 4108(3)). There are further determinations on the allowability of the costs in accordance with the general government-wide cost principles in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) at 2 CFR Part 200, Subpart E, that costs are reasonable and necessary for the performance of the grant award. Also, because section 4110 of the ESEA prohibits supplanting, the proposed use of funds for the activity must supplement, and not supplant, other State or local funds that would otherwise be used to pay for the otherwise allowable activity, in this case security cameras. Finally, LEAs and SEAs must check to ensure that the activity is not one of the prohibited activities in section 4001(b) or 8526 of the ESEA. In particular, construction is not authorized under Title IV, Part A. Thus, allowable activities regarding the condition of a school building must fall into the definition of "minor remodeling" to be allowable. See 34 CFR 77.1(b). The installation of security cameras would generally constitute a minor alteration in a previously completed building and therefore would be allowable under the definition of minor remodeling.

Can Title IV-A funds be used to purchase 504 planning tools?

No. Because Section 504 (although a federal mandate) is not a mandate under ESEA, ESEA funds cannot be used to manage or pay for the administration of that other federal program. The purchase does not meet the criteria of 2 CFR § 200.403(a) or 2 CFR § 200.404(a) 1. Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles. 2. Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.