

# Student Support and Academic Enrichment Grants: What Districts are Prioritizing with the New Flexibilities under ESSA's Title IV-A Program

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# Student Support and Academic Enrichment Grants: What Districts Are Prioritizing with the New Flexibilities under ESSA's Title IV-A Program

**FEBRUARY 2026**

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Federal policy has long financed schools' efforts to be safe and supportive and to offer varied educational opportunities. However, the COVID-19 pandemic and its lingering effects on student learning and well-being have raised the stakes for how school systems support students' success. The pandemic began shortly after the initial implementation of a key change to the *Elementary and Secondary Education Act* (ESEA): the creation of the new Student Support and Academic Enrichment program (Title IV, Part A, or "Title IV-A," of ESEA). The program is a consolidation of more than 10 programs—each with different objectives, requirements, and funding—into one. Title IV-A now funds nearly all districts in the country to provide services in three content areas: (1) increasing student access to a well-rounded education, (2) creating safe and healthy learning environments, and (3) improving and personalizing learning through technology. Although the consolidation was intended to give districts (and states) greater flexibility in using federal dollars, Congress also signaled expectations for how districts should determine what services and activities to provide and to which kinds of schools. Given the interest in and debates over this style of grantmaking, often referred to as a "block grant," it is important to understand whether policymakers' goals for the program are being met. This report addresses that question, examining how a nationally representative set of districts reported spending their funds in the 2021-22 school year and viewed the combination of new flexibilities and constraints at a time when schools were still managing pandemic-related disruptions.

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### KEY FINDINGS

- ***Most districts took advantage of the program's flexible spending rules, resulting in their spending only two-thirds of the total money allocated to Title IV-A in the 2021-22 school year.*** One-third of districts opted to transfer Title IV-A funds for use in other ESEA programs, and about one-fourth deferred spending funds until the next school year.
- ***Districts typically spent their money in just one content area, most often well-rounded education, including many districts with larger grants that were supposed to spend in all three areas.*** About half of districts with grants of \$30,000 or more did not meet minimum spending requirements. Although Title IV-A allows for spending across a wide variety of activities, districts typically funded a small number of activities, with a focus on science, technology, engineering, and mathematics (STEM) courses and mental health education.
- ***Few districts met the expectation of targeting their funds toward high-need schools or students, though most reported assessing local needs to inform what activities to fund.*** Nearly all districts reported consulting with stakeholders about the best use of Title IV-A funds for the 2021-22 school year, and the majority of districts conducted a comprehensive needs assessment.
- ***Most districts considered Title IV-A to be sufficiently flexible to address their needs, but they reported some challenges meeting all requirements.*** The majority of districts considered the program to be flexible. Despite that flexibility, about half of districts still reported challenges understanding how funds can be used and aligning program spending with their needs.

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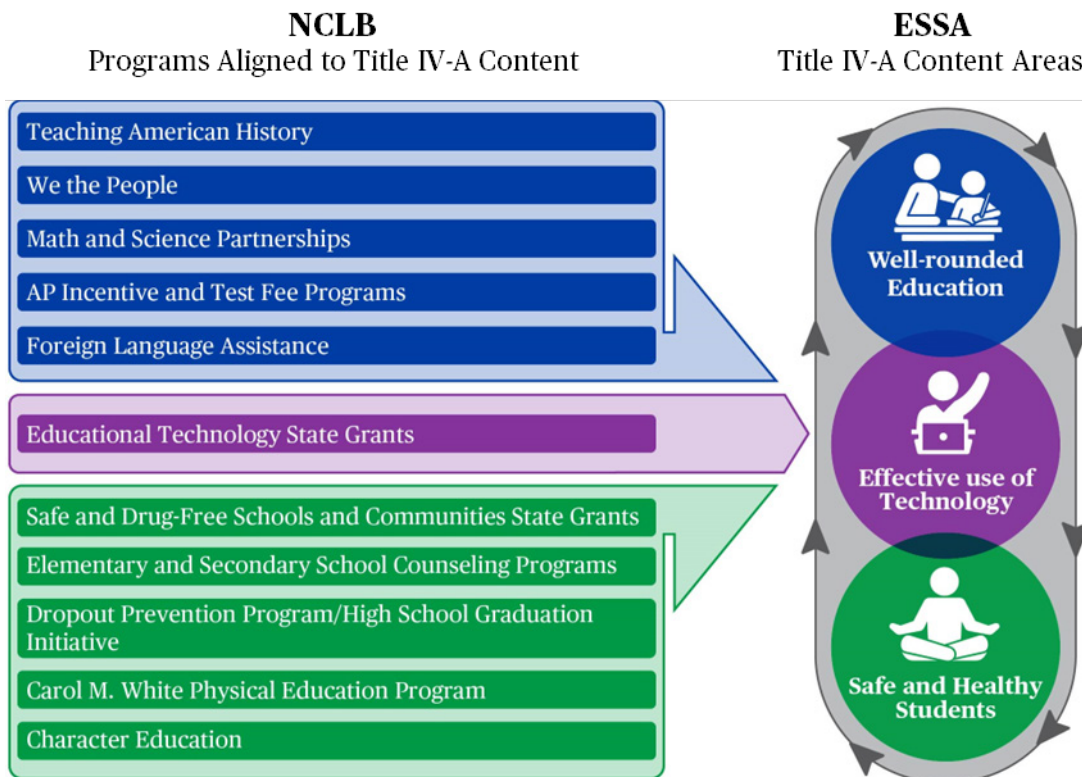
Long before the pandemic, federal policymakers had established numerous programs to help states<sup>1</sup> and districts enrich students' learning environments as part of the *No Child Left Behind Act of 2001* (NCLB). Some of these programs, such as the Safe and Drug-Free Schools State Grants and the Education Technology State Grants, had broad purposes and significant annual funding and so were

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distributed by formula to all states and, within states, to all eligible districts. For other programs with less funding, the U.S. Department of Education (the Department) held competitions for grants, awarding funds directly to smaller numbers of states or districts. The funding levels for each of these programs varied over time depending on Congress' priorities, as did the amounts awarded to grantees.

In 2015, Congress pivoted to a somewhat different approach. The *Every Student Succeeds Act* (ESSA) replaced NCLB that year and consolidated more than 10 of these individual programs into one: the Student Support and Academic Enrichment grant program (Exhibit 1).<sup>2</sup> A key objective of the shift was to give states and districts more flexibility to tailor school activities to best fit their students' needs. This approach to federal funding, often referred to as "block granting," is consistent with that goal. Compared to a set of separate programs that fund more narrowly-defined categories of activities, block grants generally address broader purposes, have fewer requirements, and allow more flexible uses of funds. The resulting Title IV-A program provides funds to states and districts to increase capacity in three broad content areas that were previously supported under separate programs: (1) courses and programs to provide students with a *well-rounded education*, (2) activities to ensure that school conditions support *safe and healthy students*, and (3) strategies to make *effective use of technology*. (See the Box in Appendix A for allowable activities within each content area.)

**Exhibit 1. Examples of NCLB Programs Consolidated Under Title IV-A**



Notes: Other NCLB programs that were aligned to Title IV-A content but continued to be authorized and separately funded under ESSA, such as Arts in Education, Striving Readers/Comprehensive Literacy Development, and the Safe and Drug-Free Schools National Program, are not included above.

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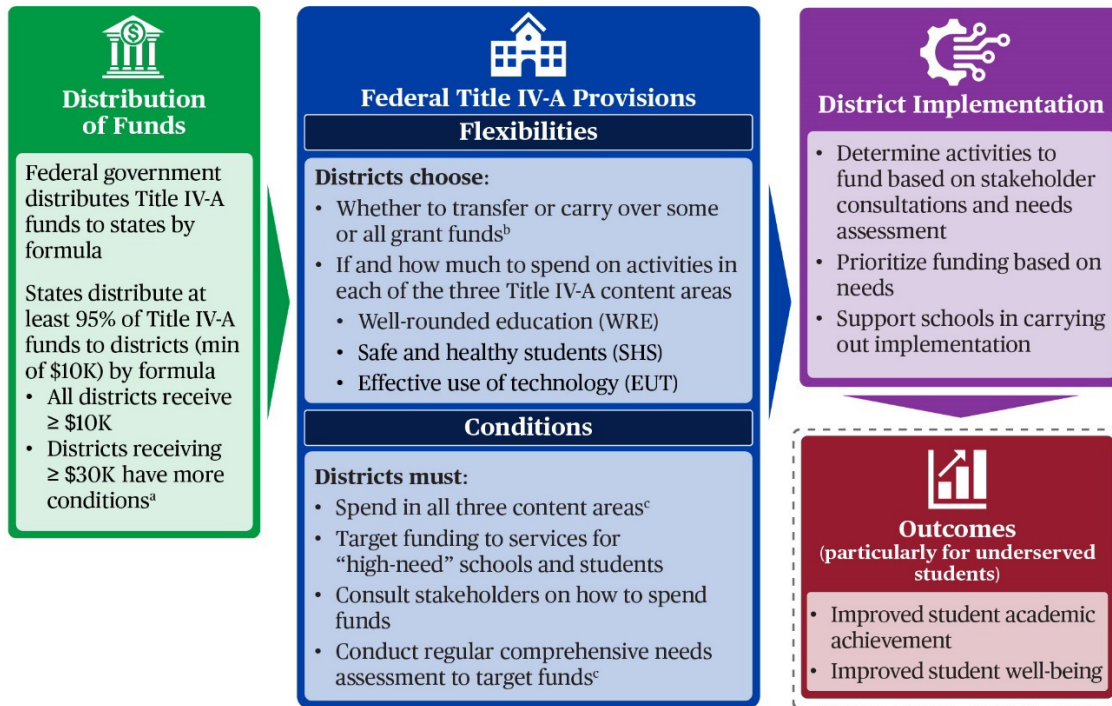
Since the program's inception, Congress has appropriated more than \$9 billion in total for Title IV-A. Much like ESEA's signature program, Title I-A, these funds are allocated by a formula that takes into consideration student poverty and enrollment, first by the Department to states, and then by states to districts. (See Appendix A for annual Title IV-A appropriations and for more information about funding formulas and state activities.)

Given the funding formula and relative size of the program—\$1.4 billion compared to \$18.4 billion for Title I-A in fiscal year (FY) 2024—the vast majority of districts receive Title IV-A funds, but the amount of each grant is relatively small. For example, 94 percent of districts received a Title IV-A grant from their state in the 2021-22 school year, and approximately two-thirds of districts (66 percent) received less than \$30,000, averaging about \$14,000 per district. The remaining grants ranged from \$30,000 to \$5.8 million, averaging about \$149,000 per district (Appendix Exhibits C-1 and C-2). On average, these funds represented just 0.2 percent of the district's total revenue per student (Appendix Exhibit C-3).<sup>3</sup>

ESSA gives districts considerable flexibility over where, when, and how to spend their Title IV-A grants, but also sets some conditions for using the funds (Exhibit 2). First, districts can decide *where* to use the program funds by moving or “transferring” the funds between Title IV-A and other ESSA programs to best meet the specific needs of their student population. Second, they can decide *when* to use program funds, by choosing to defer spending and “carry over” some of their funds into the next year. Finally, districts have flexibility in deciding *how* to spend their Title IV-A funds. Though the legislation requires districts that receive more than \$30,000 (“high-allocation” districts) to support efforts in all three content areas, policymakers also signaled a recognition that some districts with Title IV-A grants below \$30,000 might struggle to find meaningful ways to spread the money across all three areas. As such, lawmakers exempted these “low-allocation” districts from having to spend funds in all three areas. In return for these flexibilities, the legislation required all districts to prioritize “high-need” schools and students. Additionally, Congress required districts to undertake a transparent and systematic process for determining how to use the funds, based on stakeholder consultations for all districts and regular comprehensive needs assessments for high-allocation districts.

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**Exhibit 2. Title IV-A Program Model**



Note: Dashed lines indicate information not included in this study.

<sup>a</sup> Districts receiving  $\geq$  \$30K are referred to as “high-allocation” districts.

<sup>b</sup> These flexibilities are also available for some other ESSA programs such as Title II-A.

<sup>c</sup> Condition only applies to high-allocation districts.

This report examines the extent to which districts aligned their implementation with Congressional expectations for Title IV-A. Prior to ESSA, the last major effort to block grant federal educational programs was in 1981, and policymakers continue to discuss the potential benefits and drawbacks of consolidating programs in this way.<sup>4</sup> This report helps inform that debate by drawing on surveys from all states and a nationally representative sample of districts (state findings are presented in Appendix D). It focuses on how districts spent their FY 2021 funds in the 2021-22 school year, a year of transition after the height of the school disruptions stemming from the COVID-19 pandemic. This timing sought to balance policymakers’ immediate interest in how Title IV-A was being implemented with their interest in obtaining information that was not wholly unique to the pandemic period. More about the data collection and other aspects of the study design are summarized in Box 1 and described in more detail in Appendix B.

## Box 1. Overview of the Study's Analytic Approach

### What questions did the study address?

- To what extent did districts take advantage of key Title IV-A flexibilities, as intended by ESSA?
- To what extent did districts spend across all three content areas emphasized under the Title IV-A block grant, given its flexibilities and requirements?
- To what extent were funding decisions and patterns of spending consistent with the intent of identifying and then targeting funds to schools and students with the greatest needs?
- Did districts find Title IV-A sufficiently flexible to meet their needs, and what implementation challenges did they experience?

This report focuses on district implementation of Title IV-A because states distribute nearly all program funds to districts, keeping at most 5 percent of funds for state-level activities to support districts. Appendix D includes exhibits with findings about state implementation.

### What data were collected?

The study examined district and state use of their FY 2021 funds during the 2021-22 school year, based on four data sources:

- **District survey.** The study administered a survey to a nationally representative sample of district Title IV-A coordinators in summer 2022. Of the 1,096 districts contacted for the survey, 930 responded (85 percent).
- **State survey.** The study administered a survey to all state Title IV-A coordinators in summer 2022, which included 50 states, the District of Columbia, and the Commonwealth of Puerto Rico. Fifty of 52 jurisdictions responded to the survey (96 percent).
- **Common Core of Data (CCD).** The study used the National Center for Education Statistics' annual database of all public schools and districts to examine the number of schools in a district and district revenue from federal, state, and local sources.
- **Small Area Income and Poverty Estimates (SAIPE) program.** The study used the U.S. Census Bureau's annual estimates of income and poverty statistics to examine the number of children living in poverty for each school district in the United States.
- **U.S. Department of Education fiscal year budget summaries.** The study used the budget summaries to determine annual appropriations for NCLB programs aligned to Title IV-A content.

### How were the data analyzed?

- The study tabulated responses to survey questions into descriptive statistics, such as counts and percentages. Statistical tests were used to determine how likely differences in survey responses between districts that received at least \$30,000 ("high-allocation" districts) and those that received less than \$30,000 ("low-allocation" districts) would be observed under the assumption that there are no true differences between the two groups of districts. If a difference is

statistically significant, there is less than 5% chance that the true difference between the groups is zero.

- The study weighted district survey responses to reflect the full population of districts that received Title IV-A funding. These weights were based on districts' probabilities of being randomly selected for inclusion in the survey sample and adjusted to account for districts that did not respond to the survey.

**What are key limitations of the study?**

- The study is only able to provide a complete picture of Title IV-A spending for roughly half of the districts. In particular, the study's findings on the use of funds and types of schools and students targeted are limited to the 49 percent of districts that used all of their FY 2021 funds that remained after transfers in the 2021-22 school year. The study is unable to provide a complete picture for the other districts because they carried over FY 2021 funds into the 2022-23 school year, but the study did not collect spending details for that next year. Moreover, the study did not collect details on how districts ultimately spent Title IV-A funds that were transferred to other ESSA programs (other than how much was transferred and to which programs). (See Appendix B for additional information on which districts are covered in each set of findings.)
- This study was conducted during an atypical year when many districts faced challenges supporting the needs of all students because of the pandemic and also had significant resources available from the Elementary and Secondary School Emergency Relief Fund (ESSER). As a result, the findings presented here could have been different if data were collected at another time. (See Appendix A for more information about the availability of ESSER funds.)

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**MOST DISTRICTS TOOK ADVANTAGE OF THE PROGRAM'S FLEXIBLE SPENDING RULES, RESULTING IN THEIR SPENDING ONLY TWO-THIRDS OF THE TOTAL MONEY ALLOCATED ON TITLE IV-A IN THE 2021-22 SCHOOL YEAR**

ESSA provisions allow districts to transfer funds across several programs to best meet their needs, which gives districts more decision-making authority compared to NCLB. Under ESSA, districts can transfer any amount of their Title IV-A funds to other ESSA programs.<sup>5</sup> This is in contrast to the NCLB provision that limited such transfers to no more than 50 percent of the total allocation for several programs, including those that covered similar content areas as the current Title IV-A program under ESSA.<sup>6</sup> Districts can also transfer funds into Title IV-A from one other program, Title II-A, which supports effective instruction through the preparation, recruitment, and training of educators.

On other dimensions, ESSA maintained but did not expand NCLB flexibilities. For example, ESSA kept the ability for eligible rural districts to spend Title IV-A funds to support activities authorized by other ESSA programs through the Alternative Fund Use Authority (AFUA) but without the need to formally transfer the funds. It also maintained the flexibility for districts to "carry over" unspent funds in several programs, including Title IV-A, for use in the following year.<sup>7</sup>

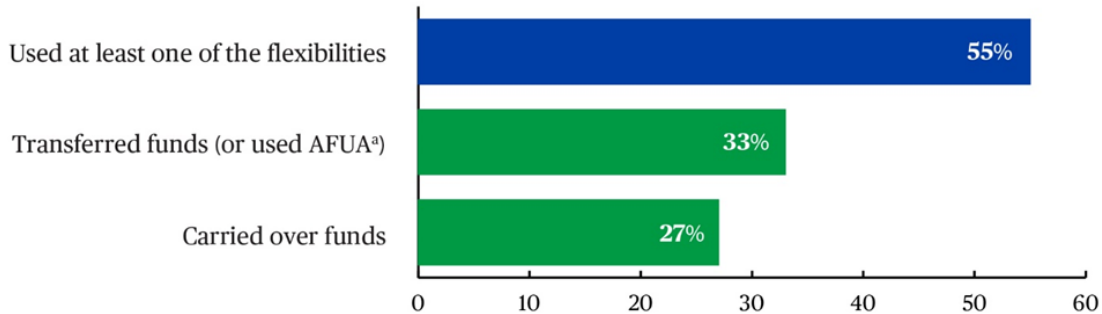
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- **About half of districts reported using one or more of Title IV-A's federal spending flexibilities for the 2021-22 school year.** Of the \$1.1 billion Congress provided to districts through FY 2021 Title IV-A appropriations, they spent \$765 million on Title IV-A in the 2021-22 school year, transferred \$165 million to other ESSA programs, and carried over \$202 million to be used in the following school year (Appendix Exhibit C-4). While districts also had the flexibility to transfer money into Title IV-A from the Title II-A program, only 1 percent of districts chose to do so, and that only amounted to an additional \$12 million of funds for Title IV-A overall. In total, 55 percent of districts either moved at least some of their FY 2021 Title IV-A funds to another ESSA program or carried over at least some of their funds for use in the subsequent year (Exhibit 3).<sup>8</sup> Additionally, ninety-five percent of the funds transferred from Title IV-A to other ESSA programs originated from districts that chose to transfer over 50 percent of their allocation.<sup>9</sup> This result suggests that districts found the added ESSA flexibility from lifting the 50 percent transfer cap under NCLB to be useful.

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**Exhibit 3. Percentage of districts that transferred, used AFUA, or carried over funds**



Sample: 885 districts that received FY 2021 Title IV-A funds and know how much they allocated to Title IV-A programs, activities, or administrative costs.

Source: District Survey, Items 1-6.

<sup>3</sup> The Alternative Fund Use Authority (AFUA) allows eligible rural districts to spend Title IV-A funds to support activities authorized by other ESSA programs without the need to formally transfer the funds.

- **One-third of districts took advantage of the option to use Title IV-A funds for other ESSA programs, and those that did primarily used the funds for Title I-A.** During the 2021-22 school year, 20 percent of districts transferred funds out of Title IV-A to another ESSA program, and 13 percent spent Title IV-A funds in other ESSA programs under the AFUA (Appendix Exhibit C-5). Among the districts that transferred funds out of Title IV-A, 81 percent reported transferring their entire Title IV-A allocation to other programs, and 78 percent transferred some or all of their funds to Title I-A (Appendix Exhibit C-7). This pattern mirrored that of the similarly structured Title II-A program under ESSA that supports effective instruction, with districts transferring 26 percent of their funds to other ESSA programs in the 2021-22 school year, primarily to Title I-A (89 percent of districts that transferred funds).<sup>10</sup> The Title I-A program under ESSA provides financial assistance to districts and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet state academic standards. It is by far the most expansive ESSA program and only allows for funds to be transferred in and not out. In particular, high-poverty districts were most likely to transfer Title IV-A funds (Appendix Exhibit C-6).

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- **About one in four districts took advantage of the option to carry over their Title IV-A funds into a second year.** Twenty-seven percent of districts took advantage of the flexibility to determine when to use their funds, carrying over some or all of their funds into a second year, with an average of 43 percent of the district's allocation carried over (Appendix Exhibit C-8).<sup>11</sup> This provision may have been particularly useful in the 2021-22 school year, when many districts had funds remaining from the ESSER programs that were provided in response to the pandemic, some of which had to be committed by September 30, 2022.<sup>12</sup> Small districts, rural districts, and districts that received less than \$30,000 were less likely to carry over any funds (Appendix Exhibit C-9).

### **DISTRICTS TYPICALLY SPENT THEIR MONEY IN JUST ONE CONTENT AREA, MOST OFTEN WELL-ROUNDED EDUCATION, INCLUDING MANY DISTRICTS WITH LARGER GRANTS THAT WERE SUPPOSED TO SPEND IN ALL THREE AREAS**

Congress signaled its views on the importance of each of the program's three areas by including a requirement for districts in some cases to spend funds in each of these areas. This requirement, which only applies to high-allocation districts—those that received at least \$30,000—specifies a minimum spend of 20 percent on *well-rounded education*, 20 percent on *safe and healthy students*, and at least some spending on *effective use of technology*. Low-allocation districts—those that received less than \$30,000—were exempt from this requirement however, perhaps in recognition that funding may not be sufficient for all of these districts to use meaningfully across multiple areas.

The requirement for many districts to fund activities across the three content areas represents a change from NCLB, when many of the programs related to Title IV-A were discretionary grant programs. There the awarded funds could only have been used on the narrower activities allowable under each program. By contrast, within and across the three content areas of Title IV-A are a wide variety of activities that districts can fund, with the legislation providing examples of more than 50 types.<sup>13</sup> Congress therefore seemed to be pushing for more choice and variety in district spending with the shift to Title IV-A.

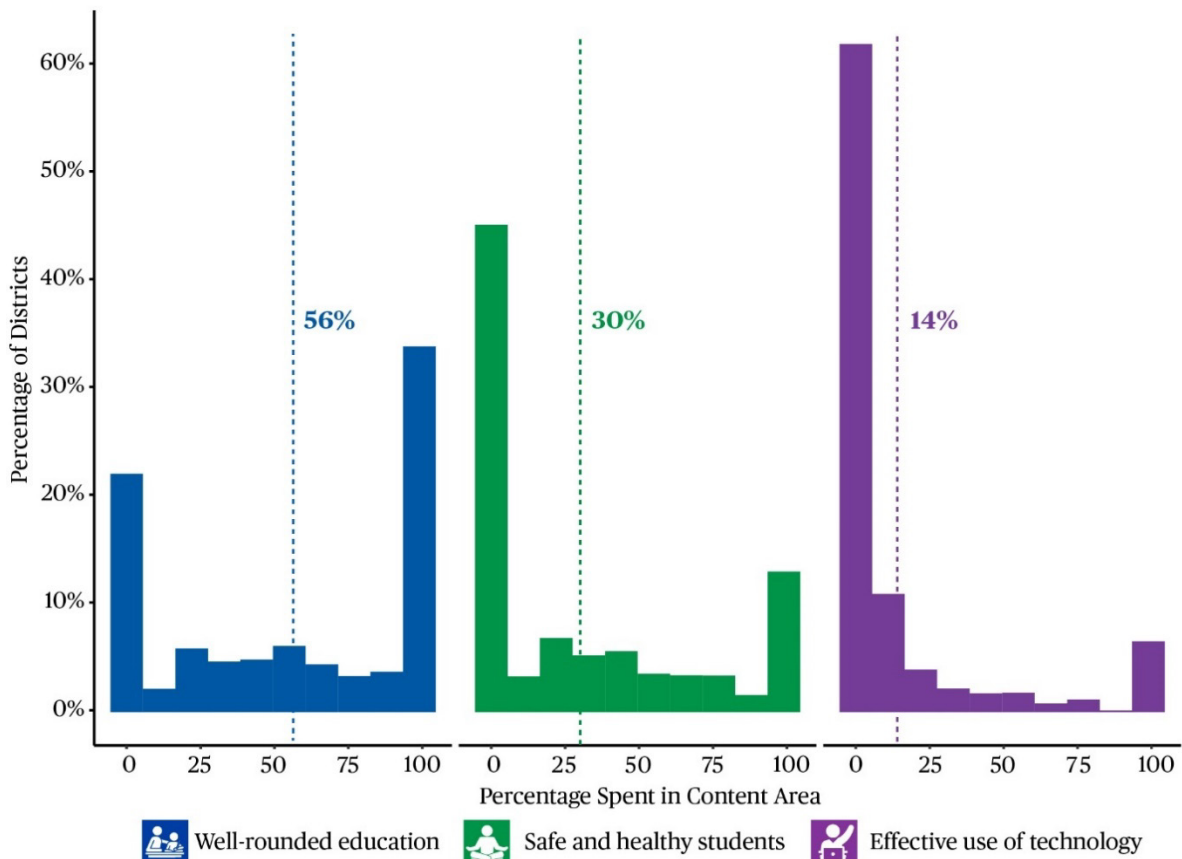
Relatedly, with the shift to Title IV-A, Congress lessened its influence over the spending emphasis for particular content areas. Under NCLB, Congress could express preferences on relative spending, as evidenced by the fluctuating amounts it appropriated each year to the specific programs that were eventually folded into Title IV-A. From FY 2002 to FY 2016, the relative share of annual funding for NCLB programs aligned to *well-rounded education* ranged from 11 to 100 percent (average of 42 percent); 0 to 50 percent (average of 37 percent) for programs aligned to *safe and healthy students*; and 0 to 48 percent (average of 20 percent) for programs aligned to *effective use of technology* (Appendix Exhibits C-27 and C-28). Congress under NCLB seemed on average to indicate a higher prioritization for *well-rounded education* and *safe and healthy students*, and relatively lower prioritization for *effective use of technology* similar to the spending requirements under Title IV-A for high-allocation districts.

About half of the districts spent all of their FY 2021 Title IV-A funds in the 2021-22 school year, which amounted to approximately one-third (\$382 million) of the \$1.1 billion that was allocated to the entire program that year (Appendix Exhibit C-4). Findings in this section are limited to these districts.<sup>14</sup>

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- Districts spent the majority of their Title IV-A funds in well-rounded education.** These districts, on average, spent the largest share of their funds on activities to support a *well-rounded education* (56 percent of funds), followed by activities to foster *safe and healthy students* (30 percent) and activities to promote the *effective use of technology* (14 percent; Exhibit 4 and Appendix Exhibit C-10). Within districts, spending in each of the three content areas ranged from 0 percent to 100 percent, with most districts electing to spend all of their funds in a single content area (Appendix Exhibit C-11).

**Exhibit 4. Distribution of district Title IV-A spending across content areas in 2021-22**



Sample: 436 districts that had FY 2021 Title IV-A funds available after allowable transfers and spent all funds in the 2021-22 school year.

Dotted lines are average spending across all districts in each content area.

Source: District Survey, Items 1-8 and 11, based on a calculation of the funds received, transferred, or used under the Alternative Fund Use Authority and the amount used in the current year.

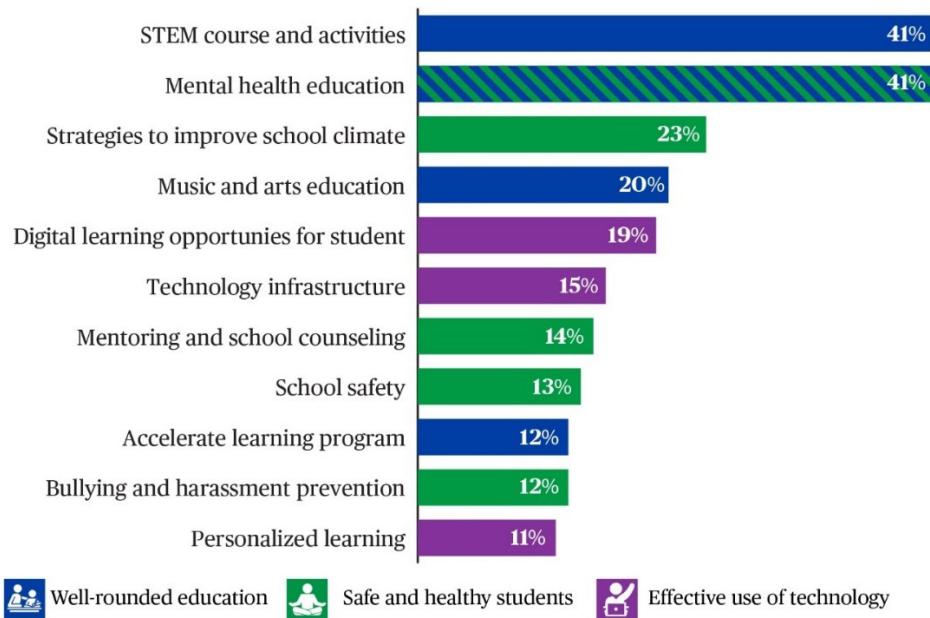
- Most high-allocation districts invested in all three content areas, as required, but still about half spent below the established minimums.** About two-thirds of high-allocation districts that spent all their Title IV-A funds in the 2021-22 school year (69 percent) spent the funds across all three content areas (Appendix Exhibit C-11). However, nearly half of high-allocation districts (46 percent) did not spend the minimum in at least one content area (Appendix Exhibit C-12).<sup>15</sup> Similar shares of districts underspent in each of the three content areas, with 20 percent spending below

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the minimum in well-rounded education, 23 percent in safe and healthy students, and 25 percent in effective use of technology. In fact, nearly three-fourths of low-allocation districts (71 percent), which did not have an established minimum, invested in just one content area (Appendix Exhibit C-11). Nearly twice as many districts that received at least \$50,000 spent above the minimum as did districts that received between \$30,000 and \$50,000 (63 percent and 36 percent, respectively; Appendix Exhibit C-12). This finding provides further support that districts with lower allocation levels may have found it challenging to spend the relatively limited funds available through Title IV-A across multiple content areas.

- Although Title IV-A allows for spending across a wide variety of activities, districts typically funded a small number of activities, with a focus on science, technology, engineering, and mathematics (STEM) courses and mental health education.** Districts used their Title IV-A funds to support an average of 3.4 activities in the 2021-22 school year (Appendix Exhibit C-13). High-allocation districts, which on average had significantly more funds available than low-allocation districts (Appendix Exhibit C-1), spent their funds on twice as many activities (an average of 5.2 activities compared to 2.7). STEM and mental health activities were each funded by nearly twice the number of districts as the next most commonly funded activities (Exhibit 5 and Appendix Exhibit C-14). In fact, about two-thirds of districts (64 percent) used at least some of their Title IV-A funds on one or both of these activities, which are both allowable under well-rounded education; mental health education is also allowable under safe and healthy students (Appendix Exhibit C-15).<sup>16</sup> Other commonly funded activities included strategies to improve school climate, music and arts education, and digital learning opportunities.

**Exhibit 5. Percentage of districts that reported funding each activity across the three program areas**



Sample: 436 districts that had funds available after allowable transfers and spent all funds in the first year.

Source: District Survey, Items 20a, 24a, 28a.

Note: Percentages are weighted.

## **FEW DISTRICTS MET THE EXPECTATION OF TARGETING THEIR FUNDS TOWARD HIGH-NEED SCHOOLS OR STUDENTS, THOUGH MOST REPORTED ASSESSING LOCAL NEEDS TO INFORM WHAT ACTIVITIES TO FUND**

Although the goal of Title IV-A is to improve the academic achievement and well-being for all students, the legislation requires districts to target funds to high-need schools and disadvantaged students, such as students with disabilities and English learners. Though districts have flexibility to define which of their schools have the greatest needs, the law specifically identifies lowest-performing, high-poverty, and persistently dangerous schools for special consideration. Further, the focus on disadvantaged students appears to reflect a Congressional intent for Title IV-A funds to benefit particular groups of students who historically have lagged behind their peers in terms of achievement and student well-being.

So that districts can prioritize their funding to schools and students with the highest need, Title IV-A requires them to engage in a systematic process to identify their highest-need schools and to determine how to allocate their funds to address their most pressing needs. Districts are expected to engage in ongoing consultation with local stakeholders. Although the program does not impose requirements about which stakeholders districts should consult, it does provide a broad list of possible groups.<sup>17</sup> In addition, high-allocation districts are required to conduct a comprehensive needs assessment every three years to determine how to use their Title IV-A funds.<sup>18</sup>

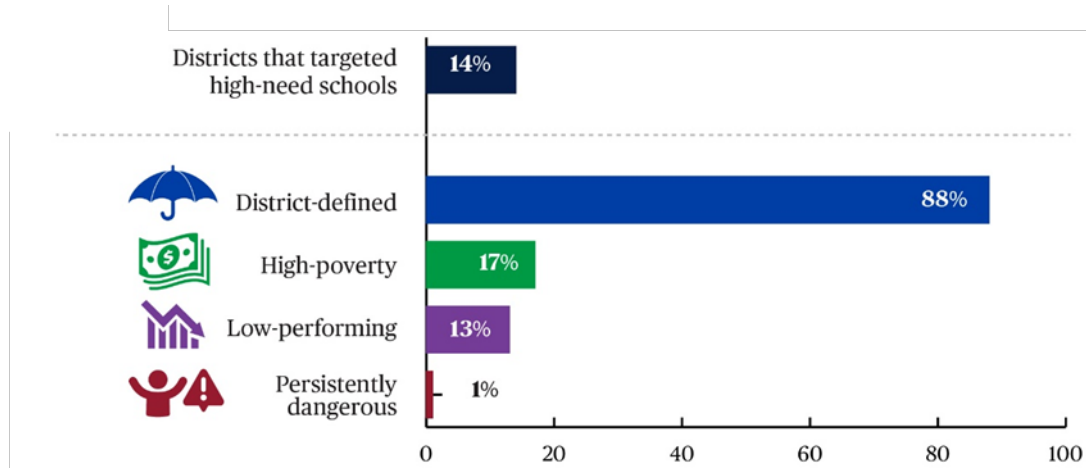
- ***Few districts reported focusing their Title IV-A spending on high-need schools, at least for the activities on which they spent the most funds.***<sup>19</sup> Only one in seven districts (14 percent) reported targeting Title IV-A funds to high-need schools, with the remaining districts spending similarly across all schools (Exhibit 6 and Appendix Exhibit C-16). This lack of targeting is partially explained by the fact that about half of districts (49 percent) only had at most one school at every level—elementary, middle, or high—which may limit their ability to differentiate between schools (Appendix Exhibit C-17). However, even among the districts with more than one school within a level, only 21 percent reported targeting funds to high-need schools.

Among the few districts that did target high-need schools, they primarily prioritized schools with the greatest need *as defined by the district* (88 percent; Exhibit 6 and Appendix Exhibit C-18).<sup>20</sup> Many fewer districts targeted high-poverty schools (17 percent) or the lowest-performing schools (13 percent). Only 1 percent of districts reported targeting persistently dangerous schools. The study did not collect the specific criteria districts relied upon when crafting their own definitions of greatest need.

The Title IV-A legislation does not dictate which specific student groups to target. Few districts reported using their funds to increase access for students with disabilities (14 percent) or English learners (11 percent) (Appendix Exhibit C-19). As might be expected, districts with more English learners were more likely to fund activities to increase access for these students. However, the same pattern did not emerge for students with disabilities (Appendix Exhibit C-20).

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**Exhibit 6. Districts that targeted high-need schools and the type of schools targeted**



Note: Percentages of types of schools targeted may not add up to 100 because districts may target funding to more than one type of school.

Percentage of districts that targeted high-need schools (top panel) is calculated from the 436 districts that had FY 2021 Title IV-A funds available after transfers and spent all funds in 2021-22.

Percentages targeting particular types of schools (bottom panel) is calculated from the 65 districts that had funds available after transfers, spent all funds, selected a top funded area, and reported targeting schools.

- Most districts consulted with at least three different groups of stakeholders to inform spending decisions.**<sup>21</sup> Ninety-seven percent of districts reported consulting with stakeholders, which was a requirement for all districts (Appendix Exhibit C-21). The majority of districts (73 percent) reported engaging with at least three different groups of stakeholders of the seven broad categories identified in the Title IV-A guidance from the Department. The most common stakeholders that districts consulted were school administrators and other school leaders (95 percent) and school staff (93 percent; Appendix Exhibit C-22). Two-thirds of districts also consulted parents (68 percent). Fewer than half consulted students (40 percent) or community organizations such as local business or government (39 percent).

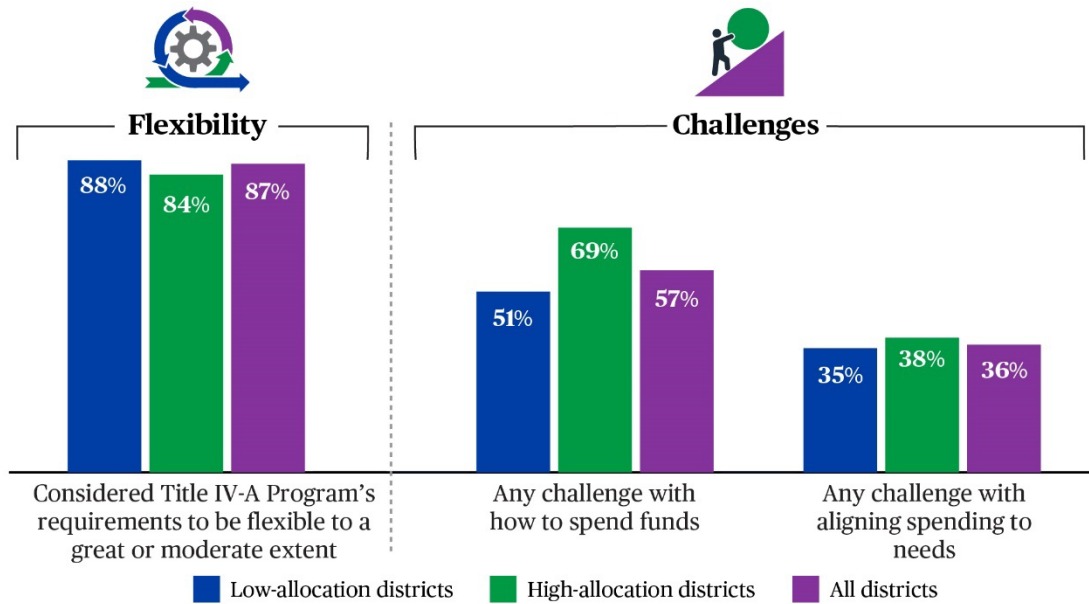
In addition to consulting stakeholders to inform spending decisions, nearly three-quarters of high-allocation districts (71 percent) reported conducting a comprehensive needs assessment within the three years leading up to the 2021-22 school year (Appendix Exhibit C-23).<sup>22</sup> This was lower than expected given the requirement to do so. Additionally, about half of low-allocation districts (53 percent) reported conducting such an assessment even though they were not required to. Although districts reported engaging in these strategies to identify district needs, there was limited evidence of targeting funds to particular schools or students.

**MOST DISTRICTS CONSIDERED TITLE IV-A TO BE SUFFICIENTLY FLEXIBLE TO ADDRESS THEIR NEEDS, BUT MEETING THE SPENDING REQUIREMENTS POSED SOME CHALLENGES**

Lawmakers intended the Title IV-A program to provide flexibility to districts to best meet local needs. Challenges implementing those flexibilities locally, though, could limit the program's potential ability to achieve its goals.

- ***The majority of districts considered the program to be adequately flexible to meet local needs.*** Eighty-seven percent of districts reported that the flexibility of the program requirements allowed them to address local needs (40 percent reported *to a great extent* and 47 percent *to a moderate extent*; Exhibit 7 and Appendix Exhibit C-24). Even though high-allocation districts have less flexibility to decide how to spend their funds due to the minimum spending requirements, similar proportions of high- and low-allocation districts agreed that the program's flexibility was helpful for meeting local needs (84 percent and 88 percent, respectively). Forty percent of districts reported that the flexibility to spend funds across content areas was the most important Title IV-A flexibility (Appendix Exhibit C-25). Other flexibilities, such as transferring funds to other ESSA programs (15 percent), were much less often reported as being the most important flexibility.
- ***Still, about half of districts reported challenges with how to spend their funds and with aligning program spending with their needs.*** Fifty-seven percent of districts reported at least one challenge related to determining how they were allowed to use program funds (Exhibit 7 and Appendix Exhibit C-26). This includes challenges such as interpreting allowable use of funds and understanding or applying state requirements about the allowable use of funds. This was true for both high- and low-allocation districts, though high-allocation districts were more likely to report these challenges (69 percent and 51 percent, respectively). Additionally, about a third of districts (36 percent) reported at least one challenge related to aligning spending with needs. This includes limited engagement from stakeholders and identifying appropriate programming to meet needs. High- and low-allocation districts reported similar levels of challenges in this area (38 percent and 35 percent, respectively).

Exhibit 7. District perceptions of flexibility in Title IV-A requirements and spending challenges



Sample: 677 districts that had FY 2021 Title IV-A funds available after allowable transfers and spent any funds in 2021-22. Six districts (3 high-allocation and 3 low-allocation) were excluded from the analysis of flexibility because of missing data, and 1 low-allocation district was excluded from the analysis of challenges because of missing data.

Source: District Survey, Items 2, 18, and 34.

Note: Districts could select up to three challenges.

## LOOKING AHEAD

This study's findings highlight districts' early experiences implementing ESSA's Title IV-A program. Title IV-A's consolidation of more than 10 NCLB-era programs into a single, new block grant, sheds light on both the benefits and challenges of this approach to providing federal funding through states to districts to deliver important services to schools and students. Although Title IV-A was intentionally designed to increase flexibility in spending, districts' use of funds did not always mirror the apparent intention of legislators. Despite being conducted within the context of a challenging year following the pandemic, the results of this study can inform those efforts broadly and improvements to Title IV-A, in particular.

- Did giving districts more flexibility reveal different preferences for spending than was likely possible under the prior NCLB programs?** The findings suggest that districts chose to spend their funds differently than would have been allowable prior to the creation of Title IV-A under ESSA. First, many districts chose not to use their Title IV-A funds directly but rather consolidated those funds with other programs, mainly Title I-A.<sup>23</sup> While there was transfer authority prior to ESSA for some formula programs that overlapped with Title IV-A, these were limited to 50 percent of program funds. In contrast, when districts transferred funds under Title IV-A, they typically transferred more than 50 percent of their allocation.

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Second, most districts did not spend their Title IV-A funds on the wide array of activities that align with Title IV-A's three content areas or all of the NCLB program purposes, such as history and civics education, safe and drug free schools, and educational technology. Many NCLB programs were discretionary competitive grants, so districts could exercise some choice by deciding which to compete for. However, if they wanted all of the funds that could be available to them, they would have had to use those funds for the broader array of purposes covered by these various grant programs under NCLB. In contrast, when guaranteed an amount of funds via formula and given substantial choice over how to use those funds, districts appear to have preferred to focus the spending relatively narrowly.<sup>24</sup>

During the NCLB years, Congress initially funded *safe and healthy students* and *effective use of technology* at much higher levels than *well-rounded education* (Appendix Exhibits C-27 and C-28). Congress then shifted its emphasis to be similarly high for *safe and healthy students* and for *well-rounded education* but provided no funding for *effective use of technology*. On average, under NCLB, Congress put the most emphasis on programs aligned to the *well-rounded education* area (42 percent of NCLB program appropriations), with a slightly smaller emphasis on programs aligned to *safe and healthy students* (37 percent of NCLB program appropriations), and a much smaller emphasis on programs aligned to *effective use of technology* (20 percent of NCLB program appropriations).<sup>25</sup> Under Title IV-A in 2021-22, districts had a somewhat similar pattern of spending compared to NCLB averages, albeit with a stronger emphasis on *well-rounded education* (56 percent on average across districts) compared to *safe and healthy students* (30 percent) and *effective use of technology* (14 percent). Districts also differed from each other on their spending emphases under Title IV-A and in fact, they varied to an even greater degree (from 0 to 100 percent in every content area) than during the NCLB years. It is not possible to know if differences between the spending patterns under Title IV-A and prior to ESSA are solely due to changes in the program structure but the patterns suggest that the greater flexibility under Title IV-A has allowed districts to spend funds in a manner better aligned to their underlying preferences.

- ***To what extent do district spending patterns reflect preferences likely to persist versus the unique circumstances of that pandemic year?*** Districts had an atypically large amount of money available during the 2021-22 school year as a result of the more than \$170 billion from the Elementary and Secondary School Emergency Relief (ESSER) Fund to address the impact the pandemic had on the learning environment. These funds may have swayed some districts to transfer or carry over the comparatively minimal \$1.1 billion in Title IV-A funds, or might otherwise have affected the services that districts determined were most needed. Further, concerns about student mental health had reached a critical point in 2021-2022, and districts may have spent more funds on that area than they would have prior or subsequent to the pandemic. Finally, it is possible that in many districts, due to the lingering effects of the pandemic, all schools were perceived as struggling in the 2021-22 school year in ways that made it harder for districts to differentiate which schools and students had the greatest need. On the other hand, Title IV-A has been and continues to be a relatively small program compared to other ESSA programs, and to account for a very small fraction of total per-pupil revenue for districts. Therefore, to the extent that district behaviors were driven by this fundamental fact, some of these general patterns, particularly around transfers, carryover, and the extent to which funds are spent across multiple activities may be expected to persist.

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- ***Could more guidance or assistance about allowable use of funds enable districts to more easily make choices about how to spend Title IV-A funds?*** More than half of districts reported at least one challenge related to determining how they were allowed to use program funds. It is possible that the significant flexibility around allowable expenditures may have unintentionally made what limited restrictions there were less clear to some districts. This may also help explain why about half of high-allocation districts did not meet the minimum spending requirements. There may be opportunities at both the federal and state levels to provide additional clarification for interpreting the legislation to support districts in implementing the program. The Department's [Title IV-A guidance](#) provides examples of allowable activities,<sup>26</sup> and the Title IV, Part A Technical Assistance Center ([T4PA Center](#)) has developed informational materials intended to help mitigate the reported challenges.

## **ACKNOWLEDGEMENTS**

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## **DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST**

The research team for this study included staff from Abt Global. None of the research team members has financial interests that could be affected by findings from the evaluation of the Title IV-A program. No one on the eight-member technical working group, convened by the research team two times to provide advice and guidance, has financial interests that could be affected by findings from the evaluation.

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### ENDNOTES

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<sup>1</sup> The Every Student Succeeds Act (ESSA) defines the term “state” to include the District of Columbia and Puerto Rico (Section 8101(48)). Accordingly, all references to “state” throughout this report include the District of Columbia and Puerto Rico.

<sup>2</sup> *Every Student Succeeds Act (ESSA) Overview*. (n.d.). [https://www.nassp.org/wp-content/uploads/2020/10/ESSA\\_FactSheets.pdf](https://www.nassp.org/wp-content/uploads/2020/10/ESSA_FactSheets.pdf).

<sup>3</sup> Each district’s funding level as a percentage of total revenue was calculated as the district’s FY 2021 Title IV-A funding amount, as reported in the Title IV-A district survey that this study administered, divided by the district’s total school year 2020-21 revenue from federal, state, and local sources (obtained from the U.S. Department of Education’s Common Core of Data (CCD) School Year 2020-21 School District Finance Survey (F-33)), multiplied by 100.

<sup>4</sup> Congressional Research Service. (2022). *Block Grants: Perspectives and Controversies*. <https://sgp.fas.org/crs/misc/R40486.pdf>.

<sup>5</sup> Districts may transfer their Title IV-A funds to Title I-A, Title I-C, Title I-D, Title III-A, and Title V-B.

<sup>6</sup> Sec. 6123(b)(2) of NCLB limited transfers to no more than 50 percent of the program allocation across a limited range of programs under Title II-A (teachers), II-D (education technology), IV-A (safe and drug free schools), IV-B (21<sup>st</sup> Century Community Learning Centers), and V-A (innovative approaches to reform education and improve schools). <https://www.govinfo.gov/content/pkg/PLAW-107publ110/html/PLAW-107publ110.htm>.

<sup>7</sup> This carryover flexibility similarly existed for several NCLB programs that were related to the areas covered by the current Title IV-A ESSA program.

<sup>8</sup> Nearly one fourth of districts (24 percent) did not spend any of their FY 2021 Title IV-A allocations during the 2021-22 school year as a result of transferring their funds to other programs or carrying over their funds (Appendix Exhibit C-4).

<sup>9</sup> Of the \$164 million transferred to other programs, only \$8 million was from districts that transferred up to 50 percent of their FY 2021 Title IV-A allocations. The remaining \$156 million was from districts that transferred greater than 50 percent of their allocations.

<sup>10</sup> Office of Elementary and Secondary Education, U.S. Department of Education. (2023 August). *State and District Use of Title II, Part A Funds in 2021-22*, Exhibit B.41. <https://www.ed.gov/sites/ed/files/2023/08/Title-IIA-UseOfFunds-2021-22.pdf>.

<sup>11</sup> Findings on the extent to which districts carried over their funds are limited to the 719 districts (80 percent of the sample) that had funds available after allowable transfers.

<sup>12</sup> U.S. Government Accountability Office (2024). *School Districts Reported Spending Initial COVID Relief Funds on Meeting Students’ Needs and Continuing School Operations*. <https://www.gao.gov/assets/880/872053.pdf>.

<sup>13</sup> See Sections 4107, 4108, 4109 in the Every Student Succeeds Act. <https://www2.ed.gov/documents/essa-act-of-1965.pdf>.

<sup>14</sup> More specifically, the only districts for which the study has a complete picture of how they spent their FY 2021 Title IV-A funds are the 436 districts (49 percent of the sample) that had funds available after allowable transfers and spent all funds in the 2021-22 school year. The population of districts represented by this sample of 436 received a total Title IV-A appropriation of approximately \$400 million in FY 2021, did not receive additional transfers from Title II-A, and transferred \$19 million of those funds to other programs.

<sup>15</sup> To help alleviate challenges resulting from the COVID-19 pandemic, for FY 2019 and FY 2020 funds, states could waive the requirements for high-allocation districts to spend at least 20 percent on providing students with a *well-rounded education*, at least 20 percent on fostering *safe and healthy students*, and at least some funds on the *effective use of technology*. However, the requirement for high-allocation districts to meet the minimum spending levels was back in place for FY 2021, the year that is the focus of this study.

<sup>16</sup> Although mental health activities could be considered part of *well-rounded education* or *safe and healthy students*, district respondents on the survey were instructed to categorize each of their mental health activities into just one of the two content areas, to avoid being double counted.

<sup>17</sup> The Title IV-A non-regulatory guidance refers to the following broad stakeholder groups: school administrators and other school leaders; school staff, including teachers and support staff; parents; students; community-based organizations, local government, or businesses; Tribes or Tribal organizations; or other stakeholders. <https://www2.ed.gov/policy/elsec/leg/essa/essassaagrantguid10212016.pdf>.

<sup>18</sup> Program expectations for a comprehensive needs assessment include examining local needs for improvement of (i) access to, and opportunities for, a well-rounded education for all students; (ii) school conditions for student learning in order to create a

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healthy and safe school environment; and (iii) access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.

<sup>19</sup> Findings on the extent to which districts targeted their funds to high-need schools are limited to the 436 districts (49 percent of the sample) that had funds available after allowable transfers and spent all funds in the 2021-22 school year.

<sup>20</sup> The survey questions about whether districts targeted funds to particular schools were limited to the activity within each content area on which districts reported spending the most funds. Therefore, findings on the types of schools districts targeted are also limited to 65 districts (7 percent of the sample) that had funds available after allowable transfers, spent all funds in the 2021-22 school year, and reported spending differently across schools.

<sup>21</sup> Findings on the extent to which districts consulted stakeholders and administered comprehensive needs assessments are limited to the 677 districts (75 percent of the sample) that had funds available after allowable transfers and spent any funds in the 2021-22 school year.

<sup>22</sup> To help alleviate challenges resulting from the COVID-19 pandemic, for FY 2019 and FY 2020 funds, states could waive the requirements for districts to conduct a needs assessment. However, the requirement was back in place for FY 2021, the year that is the focus of this study.

<sup>23</sup> That said, districts that transferred funds out of Title IV-A could still have spent those funds on Title IV-A types of activities, as many similar activities are also allowable under Title I-A or Title II-A.

<sup>24</sup> This appears to be the case despite Congress still encouraging districts to spend broadly under Title IV-A, as evidenced by the fact that (1) many high-allocation districts did not meet the minimum spend requirements in all three content areas, (2) most districts elected to spend all of their funds in a single content area, (3) districts typically funded only a small number of activities. That said, since the amount of funding available from Title IV-A is lower than the typical amount that would have been available from a given discretionary grant under NCLB, some of the preferences in spending patterns may be at least partially driven by the grant size rather than just the degree of spending flexibility.

<sup>25</sup> These are estimates based on data from annual appropriations for programs identified to be aligned to Title IV-A content (see Appendix Exhibits C-27 and C-28). Appendix B.5.2 provides additional information about the method used to estimate NCLB funding patterns.

<sup>26</sup> See Table 1 in the Title IV-A non-regulatory guidance.  
<https://www2.ed.gov/policy/elsec/leg/essa/essassaegrantguid10212016.pdf>.