

A young girl with a pink headband is sitting on a woman's shoulders in a gymnasium. She is holding a red Wilson basketball. The woman is smiling and looking up. In the background, another woman is also looking up. A basketball hoop is visible in the upper left corner. The scene is brightly lit with overhead gymnasium lights.

Bipartisan Safer Communities Act Stronger Connections Grant Program Frequently Asked Questions



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Introduction

The **Bipartisan Safer Communities Act (BSCA)** of 2022 provides historic funding to support State educational agencies (SEAs), local educational agencies (LEAs), and schools in establishing safe, healthy, and supportive learning opportunities and environments. This includes \$1 billion through Title IV, Part A of the Elementary and Secondary Education Act (ESEA) for SEAs to competitively award subgrants to high-need LEAs to establish safer and healthier learning environments and to prevent and respond to acts of bullying, violence, and hate that impact our school communities at individual and systemic levels, among other programs and activities.

The Department has designated this component of the BSCA the Stronger Connections Grant Program in recognition of the fact that local evidence-based school safety and climate plans, along with other evidence-based strategies for creating safe, healthy, and supportive schools, depend on meaningful engagement between school and LEA leaders and students, parents, families, and community members, and strong relationships between students and adults. These connections are vital for ensuring that school safety and climate plans are tailored to local conditions, lived experiences, and needs; well-designed; effectively implemented; and clearly communicated, including to families. LEA plans to create safe, healthy, and supportive schools should reflect a comprehensive set of evidence-based components. Examples of critical components include those related to safety assessments and corresponding safety plans and strategies (e.g., emergency operation plans), positive school culture and climate (e.g., Positive Behavioral Interventions and Supports (PBIS)), and student wellness (e.g., integrated student supports).

The following Frequently Asked Questions (FAQs) are designed to assist SEAs and LEAs in guiding effective use of Stronger Connections funds to create safe, healthy, and supportive learning environments and respond to inquiries the Department has received from SEAs, LEAs, and students and families, about program implementation. The Department encourages LEAs to work collaboratively with SEAs, parents and families, community leaders, youth and youth-serving systems, and institutions of higher education in guidance around the use of these funds.

A. Overview of the Stronger Connections Grant Program

A-1. What is the Stronger Connections program?

On June 25, 2022, President Biden signed the Bipartisan Safer Communities Act (BSCA), which provides \$1 billion in funding to State educational agencies (SEAs) to be distributed under Title IV, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). The BSCA specifies that SEAs must make competitive subgrants to high-need local educational agencies (LEAs), as determined by the SEA, for activities to support safe and healthy students under [section 4108](#) of the ESEA. The Department has designated BSCA section 4108 funds as the Stronger Connections grant program to distinguish it from the regular Title IV, Part A, Student Support and Academic Enrichment Grants program, which funds a broader range of activities, including activities to support well-rounded educational opportunities and the effective use of educational technology. The Department announced allocations and awarded Stronger Connections funds to SEAs on September 15, 2022.

A-2. How does Stronger Connections relate to the existing Title IV, Part A formula grant program?

Congress provided funding in the BSCA for the Stronger Connections grant program under Title IV, Part A of the ESEA, but established some requirements unique from the typical Title IV, Part A program. Under Stronger Connections, an SEA must make subgrant awards on a competitive basis to high-need LEAs, as determined by the SEA,^a and funds may be used only for activities authorized under section 4108 of the ESEA. Funds allocated under the program must be administered and tracked separately from an SEA's or LEA's regular Title IV, Part A formula allocation.

Because each SEA included Title IV, Part A in its approved ESEA consolidated State plan, an SEA is not required to amend its ESEA consolidated State plan to implement the Stronger Connections program. The fundamental requirements of Title IV, Part A also apply to these funds, including the supplement, not supplant, requirement (ESEA section 4110); the maintenance of effort requirement (ESEA section 8521); and the requirement to provide equitable services to private school students and personnel (ESEA section 8501 et seq.), as described further in Section E.

These FAQs address only the Stronger Connections funds under the BSCA; they do not address the general Title IV, Part A formula grant program.

A-3. How may an SEA conduct an LEA competition for Stronger Connections?

An SEA's Stronger Connections LEA subgrants competition must seek applications from high-need LEAs to use funds for activities under section 4108 of the ESEA. However, as described below, an SEA may design its Stronger Connections LEA subgrant competition in a manner that prioritizes a certain scope of LEA activities within the breadth of one or more specific allowable activities (e.g., the SEA might conduct a competition for subgrants to support conducting school safety assessments and creating safety plans, increasing access to integrated student supports, implementing Multi-Tiered Systems of Support (MTSS) or Positive Behavioral Interventions and Supports (PBIS), or improving meaningful family engagement opportunities, or other allowable activities) as described further in Section C.

A-4. Are there reporting requirements for this program?

Yes, Stronger Connections includes reporting requirements unique to this program. By drawing down the BSCA funds awarded to an SEA^b under the Grant Award Notification, the SEA assures to the Department that it will provide the following information no later than 90 days after receipt of the grant award:

- The SEA's definition of "high-need LEA" for purposes of the Stronger Connections program. The SEA has the authority to define "high-need LEA" and may define the term, for example, as an LEA with a high rate of poverty and with one or more of the following characteristics: high

^a Because Hawaii, Puerto Rico, and the Outlying Areas (American Samoa, Commonwealth of the Northern Mariana Islands, Guam, and the Virgin Islands) largely have unitary systems (i.e., a single SEA/LEA and only two LEAs in the case of the Virgin Islands), they are not required to award Stronger Connections funds competitively, nor are they required to define high-need LEA. Throughout this document, references to required SEA subgrant competition to high-need LEAs exclude these entities.

^b These requirements do not apply to Hawaii and Puerto Rico, which have unitary systems (i.e., a single SEA/LEA), or to the Outlying Areas American Samoa, Commonwealth of the Northern Mariana Islands, Guam, and Virgin Islands. Rather the assurances in their Grant Award Notification indicate that they must submit to the Department, no later than 90 days after the SEA receives its award, an update on implementation of the Stronger Connections program, containing such information as the Department may require.

student-to-mental health professional ratio; high rates of chronic absenteeism, exclusionary discipline (e.g., suspension, expulsion, seclusion, or restraint), referrals to the juvenile justice system, bullying/harassment, community and school violence, or substance use; or has experienced a natural or manmade disaster or traumatic event. See suggested considerations for defining “high-need LEA” in Question B-5.

- Whether the SEA provided the public with notice and a reasonable opportunity to comment and provide input on its definition of “high-need LEA” and a description of any such notice and opportunity.
- Whether the SEA prioritized the use of Stronger Connections funds by LEAs in the SEA’s competitive subgrant process and a description of any such priorities.
- Whether the SEA specifically prohibited one or more of the allowable uses of Stronger Connections funds by LEAs in the SEA’s competitive subgrant process in addition to any statutory prohibitions and a description of any such prohibitions.
- Whether the SEA provided the public with notice and a reasonable opportunity to comment and provide input on the design of its competitive subgrant process and a description of any such notice and opportunity.
- Whether the SEA will require LEAs to describe in their application how they have engaged or plan to engage with families, educators, and the local community (including community-based organizations and youth-serving entities) in determining how these funds will be used.

If the SEA is unable to respond in full to the information requested above by the reporting deadline, the SEA must provide, by that deadline, an update on its status related to these items.

In addition, the SEA must submit other information to the Department as the Secretary may later require, such as (1) the identification of LEAs awarded Stronger Connections subgrants; (2) how the SEA and its LEAs are using Stronger Connections funds; and (3) whether the SEA will evaluate the effectiveness of its implementation of the Stronger Connections program, including the effectiveness of LEA use of Stronger Connections funds and, if so, how it will do so. Further, the SEA must ensure that any LEAs that receive Stronger Connections grants will participate, as requested, in any Department evaluation of the Stronger Connections program and will cooperate with any audit or examination of records with respect to such funds. The Department encourages SEAs to publish the information required above on their website so that families can provide feedback and better understand the use of Stronger Connections Funds in their local context.

B. Uses of Funds, Period of Availability, External Engagement

B-1. How must SEAs and Outlying Areas use their funds?

SEAs must use at least 95 percent of Stronger Connections funds to make awards on a competitive basis to high-need LEAs, as determined by the SEA, to support activities related to safe and healthy students under [section 4108](#) of the ESEA and may reserve up to 5 percent of their allocation for State purposes. Specifically, an SEA may reserve up to 1 percent of its allocation for SEA administration of the program and may use any remaining reserved funds for State-level activities to support safe and healthy students under section 4108 of the ESEA, including providing technical assistance and other supports to LEAs implementing Stronger Connections subgrants.

Hawaii, Puerto Rico, and the Outlying Areas (American Samoa, Commonwealth of the Northern Mariana Islands, Guam, and the Virgin Islands) are not required to award Stronger Connections funds competitively nor are they required to define high-need LEA. Rather they may reserve up to 1 percent of funds for administration and must use the remaining funds to implement allowable activities under section 4108 of the ESEA. For more information on considerations related to uses of funds, see Section C.

B-2. What is the time period for which Stronger Connections funds are available for obligation by SEAs and LEAs?

Stronger Connections funds are available for obligation by SEAs and LEAs through September 30, 2026. This period includes the additional 1-year period of fund availability provided under section 421(b) of the General Education Provisions Act (GEPA) (the “Tydings Amendment”).

B-3. How must an SEA award Stronger Connections funds to LEAs?

Each SEA must competitively award Stronger Connections funds to high-need LEAs^c as determined by the State. In awarding Stronger Connections funds competitively, an SEA must follow the same policies and procedures as it would with State funds distributed by a subgrant competition. 2 CFR 200.403(c). SEAs must report to the Department whether the SEA provided or will provide the public with notice and a reasonable opportunity to comment and provide input on the design of its competitive subgrant process and a description of any such notice and opportunity.

Because Hawaii, Puerto Rico, and the Outlying Areas (American Samoa, Commonwealth of the Northern Mariana Islands, Guam, and the Virgin Islands) largely have unitary systems (i.e., a single SEA/LEA and only two LEAs in the case of the Virgin Islands), they are not required to award Stronger Connections funds competitively, nor are they required to define high-need LEA. Throughout this document, references to required SEA subgrant competition to high-need LEAs exclude these entities.

B-4. Is a charter school eligible to receive Stronger Connections funds?

A charter school that is an LEA, as defined in section 8101(30) of the ESEA, may receive a Stronger Connections subgrant like any other LEA. A charter school that is not an LEA may not receive a subgrant, but it may receive support under Stronger Connections through the LEA of which it is a part. As indicated in B-7, LEAs should consult with charter schools that are part of their LEA when developing their application.

^c “Local educational agency” is defined under the ESEA as a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or of or for a combination of school districts or counties that is recognized in a State as an administrative agency for its public elementary schools or secondary schools. If a regional educational service agency meets the SEA’s definition of “high-need,” it would be eligible to compete in the State’s Stronger Connections competition either directly or on behalf of other LEAs in its region that meet the definition of “high-need LEA,” so long as the regional education service agency meets the ESEA definition of LEA.

B-5. What does it mean for SEAs to “make awards on a competitive basis”?

The BSCA requires SEAs to make Stronger Connections grant awards on a competitive basis to high-need LEAs, as determined by the SEA. A “competitive basis” generally means a process to differentiate which applications warrant funding based on factors such as need for assistance and quality of proposed activities, as opposed to a process that awards funding to all applicants regardless of the quality of their proposed plans for using the requested funds (e.g., awarding funds by formula).

In designing the competition, SEAs may require or encourage LEAs to conduct a needs assessment prior to applying for the funds or as a condition of receiving funds. For example, an SEA’s competition could require LEAs to conduct and submit an assessment of local needs related to creating safe, healthy, and supportive schools and other learning settings. Assessments may include school safety assessments, culture and climate assessments, multilingual support assessments, capacity assessments, site assessments, and assessment of need for supportive programming before or after the school day. SEAs might also require LEAs to identify gaps between the current state and the desired state of the student and staff experience using school-specific disaggregated data, drawn from school climate surveys and/or surveys of school organizational conditions and other measures, on family, student, and staff perceptions of school safety and climate.

SEAs may also require LEAs to describe their process for meaningful culturally and linguistically centered student, parent, family, educator, staff, and community engagement and evidence of how that engagement informed their school safety and climate plans, related policies, and strategies. SEAs may also require LEAs to provide the underlying evidence base for selected strategies and approaches for which Stronger Connections funds will be used to demonstrate their likely effectiveness. SEAs may also ask LEAs to describe how they will collect or use existing data to monitor the impact of these policies on underserved students (e.g., through required school discipline data).

B-6. What might an SEA consider in defining “high-need LEA”?

The BSCA requires an SEA to define “high-need LEA” for the purposes of eligibility for Stronger Connections funds. In defining “high-need”, the Department encourages States to consider definitions that focus on LEAs with high concentrations of poverty and with one or more of the following characteristics: (1) need for additional mental health staff, which may be demonstrated by a high student-to-mental health professional ratio; (2) high rates of chronic absenteeism, exclusionary discipline, referrals to the juvenile justice system, bullying/harassment, community and school violence, students experiencing homelessness, students in foster care, or substance use; or (3) where students recently experienced a natural or manmade disaster or a traumatic event. The Department encourages a measurement of poverty that considers LEAs with high numbers of students living in poverty, as well as LEAs with high percentages of students living in poverty (e.g., at least 40 percent).

B-7. How should an SEA support meaningful student, family, educators, school staff, and community engagement when designing the competitive grant program?

The Department encourages SEAs to provide the public with notice and a reasonable opportunity to comment and provide input on the design of its competitive subgrant process, including on the definition of “high-need LEA,” to maximize the impact of these funds in providing a safe, healthy, non-discriminatory, and supportive learning environment for schools and students most in need of services.

SEAs might do this by engaging educators, parents, families, and community partners, paying close attention to hearing from a diverse set of community members and from communities that face systemic barriers. Experts suggest that family engagement may be associated with more positive outcomes when it brings diverse partners together to create policies, practices, and strategies that achieve mutually agreed upon school climate outcomes for students, schools, and communities.¹

For example, engagement with educators and staff (including their unions), students, families, and the school community is key. School representatives could include administrators, teachers, specialized instructional support personnel, related service providers, early childhood education providers, school counselors, school social workers, school psychologists, nurses, and family services representatives. Strategic planning should include student and family representatives,² and individuals and organizations that represent the interests of students, staff, and parents with disabilities and limited English proficiency. To that end, SEAs should also conduct active and specific engagement with underserved students and families -- including parents of students of color, low income students, multilingual learners, students with disabilities, American Indian, Alaska Native, and Native Hawaiian students, students in foster care, immigrant and unaccompanied migrant youth, students in correctional facilities, and students experiencing homelessness – to gather information and address circumstances that may prevent students from accessing safe, healthy, non-discriminatory, and supportive learning environments.

If an SEA chooses to provide the opportunity for public comment, an SEA must translate or otherwise provide meaningful access to relevant materials to engage English learners as well as families and other individuals who have limited proficiency in English.³

B-8. How should the LEA engage educators and other school staff in subgrant application development and implementing the grant?

SEA, LEA, and school leaders should provide ongoing and meaningful opportunities for educators and staff to be involved in the selection of evidence-based strategies and activities implemented to increase student, educator, and staff safety and well-being. Communication and collaboration between LEA and school leadership and educators and other school staff is crucial to supporting the effective use of funds, and Section 4108 specifically authorizes activities or programs that promote the involvement of parents and families.

These resources can also be used to support educator and staff health and well-being. For example, many educators and staff face challenges similar to those faced by their students and may also struggle as they watch students they serve and care deeply about going through challenging experiences. It is important to hear directly from educators about what their students need to feel safe, seen, and cared for and what they themselves need to create safe and inclusive environments for teaching and learning. Planning for the use of funds should allow for educators and staff to contribute substantively to the process, feel that their voices are valued, and allow LEA and school leaders to identify ways to delegate and share responsibilities for implementation. For example, funds may be used to support educator and school staff surveys, convenings, and other opportunities to hear directly from educators and other school staff. The Institute of Education Sciences' Regional Education Laboratories Program offers a series of resources educators can use to develop [high-quality surveys](#). Additional resources are available through the [Safer Schools and Best Practices Clearinghouse](#).

B-9. How should the LEA engage students, parents, families, and the community in the subgrant application development and implementing the grant?

Engaging students, parents, families, and community members is critical to the successful implementation of activities supported by Stronger Connection funds. It is essential that local leaders and educators consistently engage students, parents,⁴ and community partners, paying close attention to communities who face systemic barriers and how they are experiencing the implementation of selected policies, strategies, and activities. These funds can be used to support consistent and accessible family outreach, including systems to support one-on-one conversations among school leaders, teachers, and families and sharing accurate and up-to-date information about how students are doing in school.

Actively seeking and incorporating feedback from diverse parties also can expand the engagement of community members (including underserved students and families) and increase their ability to inform decision-making that influences policy and practice. For example, school and LEA leaders can better elicit and understand parent and caregiver priorities and concerns by holding town halls (in-person and virtually); [using high-quality school climate surveys](#) and/or surveys of school organizational conditions; conducting community needs and asset mapping; and bringing schools to families by hiring a parent outreach coordinator, supporting home visits, and having school representatives provide resources and training. Additionally, school and LEA leaders can conduct outreach to community-based youth serving organizations and parent organizations, establish youth or family advisory boards, and host focus groups and listening sessions with these communities.

To ensure that all families can fully engage and participate in their child's education, local leaders must communicate in accessible formats, such as ensuring that documents posted on school websites are accessible to individuals with disabilities and that communication with families is provided in languages those families can understand.^d Local leaders should also ensure that communication is available during times and in locations that are accessible for the entire school community. For additional considerations in determining allowable uses of Stronger Connections funds, see Question B-10.

B-10. What requirements must be met for certain activities to be allowable under the Stronger Connections Grant Program?

For a use of funds to be permitted, the grantee or subrecipient must determine if that activity is allowable under Stronger Connections – i.e., (1) authorized under [section 4108](#) of the ESEA; (2) reasonable and necessary for the performance of the grant; (3) allocable to the grant; (4) supplements, and does not supplant, other non-Federal funds that would otherwise be used to pay for authorized activities; (5) not one of the prohibited activities in ESEA [section 4001\(b\)](#) or [section 8526](#); and (6) consistent with any other applicable Uniform Guidance provisions (see 2 CFR 200 *et seq.*, in particular [2 CFR Part 200, Subpart E](#)). For an LEA, use of funds must also be consistent with the design of the SEA's Stronger Connections grant program and the LEA's approved subgrant application.

^d Title VI of the Civil Rights Act of 1964 requires school districts to ensure meaningful communication with parents with limited English proficiency, in a language they can understand and to adequately notify such parents of information about school programs, services, and activities.

B-11. How might an SEA use its State reservation?

An SEA must use its State reservation of up to 5 percent of Stronger Connections funds on activities that will support LEAs to advance safe, healthy, and supportive learning environments. It may do so, for example, by creating an advisory board to advise the SEA on issues, policies, and practices related to school safety, climate, and discipline. Membership on boards should reflect a diverse range of representation (i.e., students, parents, educators, community leadership, health professionals, first responders, and academics). SEAs may consider using their State reservation of funds for evaluations, such as for evaluation of the efficacy and impact of the grant program.⁵ SEAs may use funds to support State and local convenings that bring together schools, community organizations, and institutions of higher education to help establish partnerships that support the creation of safe, healthy, and supportive learning environments, for example through the establishment of State and local partnerships for student success. See question C-20 for additional information on such partnerships.

SEAs may also consider designing and offering regional, virtual, and in-person professional development for all educators and school staff on creating safe, healthy, and supportive learning environments. Such professional development should be evidence-based and may include:

- Creating and maintaining a comprehensive school emergency operations plan (EOP), including by conducting routine emergency exercises;
- Integrating and working with support staff and community partners (e.g., health specialists, specialized instructional support personnel, professional school counselors, psychologists, social workers, nurses, behavior specialists, restorative practice coordinators, expanded or out-of-school-time providers) to provide timely supports and interventions;
- Identifying trauma and providing trauma-informed care, trauma-informed de-escalation, culturally and linguistically responsive practices, early intervention, mentoring, recovery support services, responding to conflict within the school community, and, where appropriate, rehabilitation referral;
- Using effective classroom management strategies, creating a safe and healthy classroom environment, and preventing challenges;
- Developing and sustaining trusting relationships between students, families, community members, and educators (e.g., effectively using home visits, parent-teacher conferences, and advisory groups);
- Engaging with community partners to plan and prepare for emergencies, including engaging emergency responders;
- Providing interventions that support positive and trusting relationships, empathy, persistence, and other aspects of positive social and emotional well-being; and
- Using strategies like restorative practices, violence prevention, education, early identification, and supporting and responding to student behavior.

An SEA may also consider using its State reservation to ensure continuous technical assistance and supports are available to subgrantees as they implement their Stronger Connections grants. Additionally, Stronger Connections grants provide an opportunity for SEAs to strengthen school climate-related data collection from LEAs, such as exclusionary discipline data, to target additional intervention and supports to LEAs who could benefit from improvement in building healthier and more positive school climates.

C. Additional Allowable Uses of Funds

ESEA [section 4108](#) allows funds to be used for activities that foster safe, healthy, supportive, and drug-free environments and support students' academic achievement. To this end, there are a variety of evidence-based approaches that LEAs can consider as part of a comprehensive plan for creating safe, supportive, and healthy schools. This work begins with providing safe and welcoming teaching and learning environments and taking purposeful steps to be prepared to respond to different types of emergency situations. School preparedness is fortified by [prevention](#), [protection](#), [mitigation](#), [response](#), and [recovery](#) activities. These efforts are a shared responsibility between local school and community leaders, including leaders in the following spaces: schools, emergency responders, public health, and mental and behavioral health. The following questions and answers in this section address policy considerations for how Stronger Connections funds can be used to develop and implement a comprehensive, evidence-based approach to safe, supportive, and healthy schools.^e

C-1. How may funds be used to design and implement high-quality, comprehensive emergency operations plans (EOPs) and emergency drills?

The Department encourages grantees to use funds for activities that foster safe, healthy, supportive, and drug-free environments, including the development and implementation of an EOP. Comprehensive, high-quality EOPs that address the needs of all staff and students, including those with physical and mental disabilities, can help schools and LEAs plan for the variety of threats and hazards they may face, including threats such as active shooter incidents.⁶ School preparedness is fortified by [prevention](#), [protection](#), [mitigation](#), [response](#), and [recovery](#) activities. This planning also requires communication and shared responsibility between local school and community leaders, including leaders in the following spaces: schools, emergency responders, public health, and behavioral health.

To implement high-quality, comprehensive EOPs, schools should regularly practice and update their EOPs by conducting emergency exercises, ranging from discussion-based tabletop exercises to drills and functional exercises. Collaboration with a broad range of partners, professionals, and agencies will help develop and maintain a shared vision for emergency management and establish a long-term commitment to implement, practice, sustain, and update EOPs.

Best practices for emergency exercises also include creating an after-action report to help school staff reflect on lessons learned and to revise the school's EOP based on any gaps or weaknesses identified through the exercise. Differentiated approaches are recommended for assailable drills for students and school staff and must be age appropriate. For more information about age-appropriate strategies and recommendations of high-quality, comprehensive EOPs, please see the [REMS TA Center's District Guide](#) in Developing High Quality School Emergency Plans. Finally, the Department encourages LEAs to share EOPs with parents and caregivers of students so that they are familiar with the plan and can support their children in the event of an emergency.

C-2. How may funds be used to support safety and violence prevention programs?

ESEA section 4108 specifically authorizes SEAs and LEAs to use funds for programs and activities to prevent violence through the creation of safe, healthy, and supportive learning environments that positively impact student well-being and academic outcomes. The Department recommends that

^e All uses of funds must meet the threshold considerations for allowability, as discussed in Question B-10.

schools take a comprehensive approach by implementing school-based violence prevention programs in coordination and alignment with broader evidence-based community violence prevention strategies. These activities can be coordinated with community-based services and prevention programs and may include a wide variety of activities (including before, after, or summer school activities and programs) designed to meet students' physical, social, emotional, mental health, and academic needs and improve school safety and climate, such as:

- Social and emotional development and academic growth, including interventions that are culturally affirming and support positive relationships, resilience, self-control, empathy, persistence, and other aspects of positive social and emotional well-being;
- Professional development and training for all school staff and interested community members in violence prevention, education, early identification, and supporting and responding to student needs;
- Professional development and training for all school staff in trauma identification and trauma-informed care, culturally and linguistically responsive practices, intervention, mentoring, recovery support services and, where appropriate, rehabilitation referral;
- Improving instructional practices for developing relationship-building skills, such as effective communication, and improving safety through the recognition and prevention of coercion, violence, or abuse, including teen and dating violence, stalking, domestic abuse, and sexual violence and harassment; and
- Violence prevention and intervention activities and programs that are culturally and linguistically inclusive, such as individual and group counseling; age-appropriate information to prevent dating and gender-based violence; bystander intervention training; crisis management; [restorative practices](#);7 trauma-informed practices; and conflict resolution.

C-3. What should SEAs and LEAs consider in selecting evidence-based strategies supported by Stronger Connections funds?

SEAs and LEAs are strongly encouraged to invest Stronger Connections funds on evidence-based interventions that have been shown to significantly improve student safety and health as well as academic outcomes.

ESEA section 8101(21) defines the term “evidence-based” and the definition includes four tiers of evidence. Specifically, “evidence-based,” when used with respect to an SEA, LEA, or school activity, means an activity, strategy, or intervention that demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on:

- Strong evidence from at least one well-designed and well-implemented experimental study (“tier 1”);
- Moderate evidence from at least one well-designed and well-implemented quasi-experimental study (“tier 2”);
- Promising evidence from at least one well-designed and well-implemented correlational study with statistical controls for selection bias (“tier 3”); or
- Demonstrating a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes and includes ongoing efforts to examine the effects of such activity, strategy, or intervention (“tier 4”).

SEAs can review the Department’s [guidance on evidence](#). The Department’s [What Works Clearinghouse](#) identifies the tier of evidence that reviewed studies meet, as applicable. The Substance Abuse and Mental Health Services Administration (SAMHSA) [Evidence Based Practice Resource Center](#) has additional resources that may be helpful. The Department also encourages grant recipients to connect with their regional [Comprehensive Center](#), which provides high-quality capacity building services that help State clients to identify, implement, and sustain effective evidence-based practices.

C-4. How may funds be used to create and implement anti-bullying and harassment plans?

The Department encourages funds to be used to implement plans to prevent and address bullying and harassment, including identity-based bullying and harassment.^f ESEA section 4108 specifically authorizes SEAs and LEAs to use funds for programs and activities that “help prevent bullying and harassment.” The website [StopBullying.gov](#) provides information on what bullying is, what cyberbullying is, who is at risk, and how SEAs and LEAs can prevent and respond to bullying. Plans to prevent bullying and harassment could include:

- (1) Integrating anti-bullying practices (e.g., PBIS, mental health supports, [anti-hate programs](#))⁸ or programs in school to enhance learning and help prevent bullying and harassment;⁹
- (2) Improving instructional practices for developing relationship-building skills and the prevention of harassment and identity-based violence; and
- (3) Providing job-embedded, ongoing, and high-quality training for school personnel, including specialized instructional support personnel, related to bullying and harassment prevention.

LEAs and schools may use grants to establish clear practices and policies with an emphasis on:

- Inclusion and the prevention of bullying and harassment;
- Comprehensive systems for monitoring student well-being;
- Expanding access to integrated social, emotional, and mental health supports for students involved in bullying;
- Reducing exclusionary disciplinary practices and implementing fair and inclusive dress and grooming codes; and
- Engaging communities and families, including those targeted by identity-based harassment, on an ongoing basis to assess and revise policies or practices with a connection to bullying or harassment, such as strict dress codes and grooming policies.

A comprehensive system for monitoring student wellbeing (e.g., well-being assessments or climate surveys) can help educators and other school staff support students, allow for referrals to services, and learn about bullying and harassment. Surveys should allow for data disaggregation, without disclosing personally identifiable information, to identify any trends across student groups and to identify any inequitable practices or targeted instances of bullying and harassment. Such data should also allow for cross-tabulation within demographic categories, without disclosing personally identifiable information, to identify intersectional trends, practices, or instances of bullying or harassment that may affect students with overlapping identities (e.g., Black girls, Latino students with disabilities). More information

^f At least 22 percent of students 12-18 years old are bullied and 15 percent report being cyberbullied (National Center for Education Statistics (2019)). Bullying has been shown to increase the risk of students experiencing depression, anxiety, and low self-esteem, with sustained exposure to bullying associated with increased frequency of discipline issues, substance use, and aggressive behavior both in and out of school.

on high-quality measurement tools can be found at <https://safesupportivelearning.ed.gov/topic-research/school-climate-measurement>.

C-5. How may funds be used to develop and implement positive and fair discipline policies and practices?

Section 4108 (5)(F) specifically authorizes funds to be used for “designing and implementing a locally-tailored plan to reduce exclusionary discipline practices.” Plans should be “consistent with best practices,” to include “strategies that are evidence-based,” and to be “aligned with the long-term goal of prison reduction through opportunities, mentoring, intervention, support, and other education services.” The statute also allows funds to be used for the “implementation of schoolwide positive behavioral interventions and supports.” The Department encourages LEAs to use Stronger Connections funds for either of these purposes as they work to develop and implement positive and fair discipline policies and practices that can ultimately help eliminate the school to prison pipeline. Positive and fair discipline policies and practices support all students, and especially underserved students who are disproportionately impacted by exclusionary discipline.

Positive and fair school disciplinary practices create safer learning environments and are those that are evidence-based, effective, equitable, implemented school-wide, and clearly understood including by students, parents, and families. School disciplinary practices should be consistently applied to improve pro-social behaviors, teach alternative strategies, and incorporate family involvement. Effectively implementing positive disciplinary strategies may require significant time, coaching/training, and the hiring of high-quality support staff (such as restorative practice coordinators, a full-time community school coordinator, behavior specialists, mental health professionals, and social workers).

Existing school discipline policies and practices should be periodically reexamined (e.g., every year) using relevant data and feedback from students, parents, families, and educators. Ongoing inclusion of students, families, and educators in the reexamination process helps build trust and collective buy-in that supports successful implementation of these policies and practices.

LEAs may consider the use of collaborative community advisory boards for school climate, which can help all parties feel included and invested in the success of a new school discipline plan. Community advisory boards may:

- Examine the use of current exclusionary discipline practices,
- Consider the potential disparate impact on different groups of students,
- Study how policies and practices affect a school’s culture, and
- Make recommendations for policy changes, resources, training, and steps needed to change practices and improve climate.

In addition to reducing exclusionary discipline and ensuring the safety of all students, LEAs should aim to help educators create a positive climate that teaches students essential skills. In fact, research demonstrates that exclusionary discipline for non-violent behavior – especially repeated suspensions – has little effect in changing the behavior.¹⁰ Relatedly, the Department is not aware of any evidence that restraint or seclusion is an effective strategy in modifying a child’s behavior.¹¹ Rather than focusing on changing behavior through punishment or removal from the learning environment, school leaders should consider adopting practices that will help educators better support students by identifying the root cause of the behavior and developing effective strategies to eliminate or mitigate it. Building a

school culture of a curiosity and growth mindset that prioritizes solution-based thinking may encourage pro-social behavior (e.g., sharing, collaborating, empathizing, and behaviors that reduce stereotypes) and has the potential to play an important role in decreasing student discipline.¹² School communities may consider the adoption of or strengthening the implementation of the following activities:

- Implementing multi-tiered support systems like PBIS;
- Meeting student social, emotional, and academic needs through strong core instructional design;
- Increasing opportunities to support students' strengths and interests through civic engagement and service-learning, where students can apply their academic learning to solve real-world challenges;
- Phasing out exclusionary discipline practices for non-violent behavior in exchange for investments in training or programs that teach conflict resolution practices for educators and students;
- Hiring, retaining, and integrating certified, trained, and when needed bilingual, school-based psychologists, counselors, social workers, community intervention specialists, and other mental health professionals;
- Using methods that help students cope with trauma and emotional regulation such as an art program, mindfulness, and body movement activities; and
- Taking a whole-school restorative approach that includes teachers, administrators, parents, and students – including regular staff training and using practices like community building circles that encourage students to take responsibility for their actions and repair relationships with others.¹³ For additional information, please refer to the [Center on PBIS](#).

C-6. How may funds be used to implement Multi-Tiered Systems of Support to support and respond to student needs?

Stronger Connections subgrants may be used to develop, implement, and evaluate comprehensive programs and activities to establish safe, healthy, and supportive learning environments that enhance students' learning and academic success. This also includes implementing a data-based framework for decision-making and determining when and how to provide the right supports to students when they need them. Implementing evidence-based practices within an MTSS can be an effective way to organize services to students, integrate school programs into a comprehensive delivery system, determine professional development needs for educators, and engage parent and community supports.

MTSS is an integrated implementation framework for organizing a continuum of evidence-based practices to support each student's educational, social, emotional, and behavioral needs. Supports and practices are typically organized in three or more tiers of layered supports that increase in intensity based on student needs. "Tier 1" or "universal practices" establish positive, predictable, and safe environments and routines for all students and staff. These practices represent the culture of the school and the common shared values for students and staff, setting the stage for safe and positive experiences. "Tier 2" or "secondary interventions" provide targeted support for students who are not successfully meeting school expectations and continue to experience academic, social, emotional, and/or behavioral risk. Targeted support is more intensive than universal support and may be delivered in smaller groups. "Tier 3" are the most intensive and individualized supports. Supports and interventions at this level are typically provided by professionals, or members of the school team with specialized areas of expertise, involve greater collaborative efforts and partnerships with additional

community resources, and require more family engagement. For additional information about MTSS, please refer to the [Center on PBIS](#).

C-7. How may Stronger Connections funds be used to meet the social and emotional needs of students?

Stronger Connections funds may be used to support a schoolwide implementation of strategies to meet students' social, emotional, and academic needs. This includes evidence-based strategies that focus on building trusting relationships, and strategies that improve academic outcomes through teaching strategies that provide relevant and engaging learning opportunities, consistent classroom and other routines and practices to provide stability, and culturally and linguistically responsive practices that create personalized and inclusive learning environments. School leaders should consider professional development for all school staff that emphasizes a whole-child approach; this requires understanding students' cultural, linguistic, and family backgrounds as well as any potential adverse childhood experiences that create unique barriers to access and participate in their learning. Research shows that the right supports integrated consistently into classroom and school-wide activities, including asset-oriented approaches and developing strong and trusting relationships, can mitigate the impact of adverse experiences.¹⁴

LEAs should consider incorporating and fostering student voice and choice in how they learn wherever possible. This can promote student connectedness to school, and research shows that students who feel connected are more likely to exhibit healthy behavior.¹⁵

LEAs are encouraged to consider instructional practices that promote social and emotional skills, and embed opportunities for students to practice these skills in other classroom and school-wide activities. This includes:

- Explicitly meeting students' social and emotional (student self-awareness, self-management, social awareness, relationship skills, and responsible decision-making) and academic needs, which may, as appropriate, include restorative circles¹⁶ or mindful moments;
- Providing time for regular check-ins with students (one-on-one or in small-group settings) and with families;
- Establishing morning or closing meetings, or other routines within each school day;
- Creating an evidence-based whole school framework for meeting students' social, emotional, behavioral, and academic needs;
- Actively engaging students in meaningful and culturally and linguistically relevant learning experiences rooted in high academic expectations for all students;
- Providing specific and supportive feedback to students to encourage growth across all domains;
- Establishing building-level wellness teams to address the needs of both students and staff; and
- Using student engagement surveys and responding to those results by providing integrated student supports, professional development, mental health services, and other practices as needed.

For additional considerations in determining allowable uses of Stronger Connections funds, please see Question B-10.

C-8. How may funds be used to meet the mental health needs of students?

Stronger Connections subgrants may be used to increase access to mental health services, as authorized by ESEA section 4108(5)(B). In addition to hiring and preparing professionals and placing them in schools and programs, LEAs should implement a comprehensive mental health system that includes identification and referral systems that are specific to a student’s needs. Students who experience substance use, familial or community violence, or hate-based harassment—both as victims and witnesses—need individualized interventions to help them thrive.

In addition to the \$1 billion in Stronger Connections funds that were awarded by formula to SEAs, the Department will grant \$1 billion in competitive BSCA funds to eligible entities over the next 5 years to increase the number of highly qualified mental health professionals in schools via the School Based Mental Health Services Grant Program and School Based Mental Health Service Professionals Demonstration Grant Program.

Students from low-income backgrounds, students of color, students with disabilities, and English learners often face barriers to diagnosing and treating mental health issues that reach beyond whether there are services available.¹⁷ LEAs and schools should be responsive to the research that shows that for students of color, mental health issues are often more likely to be met with discipline rather than be treated.¹⁸ Even where mental health services are available, any stigma or bias associated with mental health or provision of services only in English may serve as barriers to accessing these services. Funds can be used to help reduce negative attitudes, beliefs, and behaviors and help ensure services are language accessible and inclusive with regard to race, ethnicity, culture, language, disability, and for students who identify as LGBTQI+. For example, providing educational resources for students about what mental health is and what it means to care for it, may help bridge a divide. School staff who can model openly talking about mental health, the future, and anxiety, can help normalize seeking and receiving care. LEAs can consider using funds on professional development for these purposes.

Another way subgrants might be used is through providing school-based mental health services in partnership with community-based organizations, consistent with section 4108 (5)(B), which permits school-based mental health services provided through partnership programs with a public or private mental health entity or health care entity that “provide[s] comprehensive school-based mental health services and supports and staff development for school and community personnel working in the school that are based on trauma-informed practices that are evidence-based.”

C-9. How may funds be used to support strategies that meet the needs of students with disabilities?

Funds may be used for a range of activities to meet the needs of students with disabilities and support their safety, health, learning, and success. The Individuals with Disabilities Education Act (IDEA) and its implementing regulations¹⁹ require LEAs to meet the individualized needs of children with disabilities, including their social, emotional, and behavioral needs.⁸ Many LEAs implement MTSS as a strategy to

⁸ This document does not substantively address Federal disability law, which includes the requirement that LEAs provide a free appropriate public education to eligible students with disabilities that includes special education and related services designed to meet their unique needs, consistent with the student’s individualized education program (IEP) developed under the Individuals with Disabilities Education Act (IDEA) or a plan developed under Section 504 of the Rehabilitation Act of 1973 (504 plan). This document also does not substantively address civil rights laws enforced by the U.S. Department of Education and critical to ensuring educational equity, including the Americans with Disabilities Act of 1990, Title VI of the Civil Rights Act of 1964, and Title IX of the Education Amendments of 1972.

collect data, assess students' needs, and provide real-time supports to students in a variety of areas such as academics or social, emotional, or behavioral health. MTSS can be an essential tool to provide appropriate strategies, services, and supports to students with disabilities, although it cannot be used as a substitute or a basis for delaying an evaluation of a student for needed special education and related services under the IDEA. Similarly, employing strategies that provide students with opportunities to develop and practice social, emotional, and cognitive skills that are designed to be accessible can help LEAs meet their obligations to students with disabilities. See Question C-6 for more information on MTSS. Strategies such as MTSS and universal design for learning (UDL) can be used in schools to support meaningful inclusion of children with disabilities and appropriate access to the general education curriculum in accordance with IDEA.

Additionally, IDEA requires parental involvement in a variety of ways, including through participation in the IEP Team and in educational placement decisions. These funds may be used for family and community engagement, which is a critical component to successful partnerships between schools and families. Investing in the development and implementation of clear practices and policies relating to engaging families and providing professional development for school leaders, teachers, and other educators on effective communication with families, and on an understanding of the rights of students with disabilities, can greatly benefit students with disabilities and make for stronger collaboration between families and schools.

Finally, students with disabilities experience disproportionately negative outcomes (e.g., suspension, expulsion, seclusion, and restraint) that can be addressed through these funds and specific resources are available to LEAs to support students within the context of both general and special education.²⁰ For example, students with disabilities may be more likely to experience bullying and harassment based on their disability and are disproportionately impacted by exclusionary discipline practices in schools. Therefore, the use of funds to prevent bullying (see Question C-4), promote inclusion, and implement positive disciplinary practices (see Question C-5) would be especially important to the success of students with disabilities and for appropriate and effective implementation of Federal laws.

C-10. May funds be used to support preschool students?

Stronger Connections funds may be used to support preschool aged students who are served by the LEA through a range of allowable activities that encourage the healthy growth and development of preschool-aged students. Therefore, Stronger Connections funds can be used to invest in developmentally appropriate approaches tailored to the needs of our youngest learners. For example, LEAs may use funds to create safe, supportive, and healthy climates that use early interventions and supports; develop clear, appropriate, and consistent expectations; and ensure fairness, equity, and continuous improvement. One way of pursuing this is through the reduction of exclusionary discipline in preschool settings, such as eliminating the use of suspension and expulsion. Many of the strategies described in Question C-6 can be implemented in preschool settings.

LEAs may also consider using funds to address the mental health needs of preschool-aged students served by the LEA, particularly as the social, emotional, and behavioral needs of students may have increased since the start of the pandemic. This can also help to support their successful transition into kindergarten. Strategies may include ensuring identification and referral through age-appropriate developmental and behavioral screening. Further, LEAs may also consider utilizing these resources to build strong partnerships with families and community-based organizations serving pre-kindergarten students and into the early grades, including through the provision of integrated systems of support.

C-11. How may funds be used to increase student connections and a sense of belonging at school?

The Department encourages LEAs and schools to consider ways to increase student connections and a sense of belonging at school to further the creation of a safe, healthy, supportive, and drug-free environment that supports student well-being, academic success, and other positive outcomes. Creating student connections and a sense of belonging at school requires each student to feel personally accepted, respected, included, and supported by others in the school social environment. Research shows that student belonging is correlated with improved academic outcomes, less absenteeism, and less misconduct.²¹ To support student belonging, schools and districts are encouraged to:

- Invest in high-quality teaching and learning, including by implementing culturally and linguistically responsive teaching practices;
- Use school climate surveys and/or surveys of school organizational conditions to gain a deeper understanding of school instruction, culture, and climate;
- Schedule time for one-on-one or small group check-ins with trusted adults; and
- Provide job-embedded and ongoing professional development and coaching opportunities to educators to support relationship building between students and teachers.

In addition, it is critical that schools create a safe place for students and their diverse and intersectional identities; this may include creating space for students to share about their interests, developing opportunities for students to exercise their voices and leadership, and completing a comprehensive review of school discipline policies to ensure they are fair and nondiscriminatory.

C-12. May funds be used to promote student physical fitness?

ESEA section 4108(5)(C)(ii) provides that funds under this section may be used for “programs or activities that support a healthy, active lifestyle.” Accordingly, using BSCA funds to establish, promote, or expand physical fitness and recreational activities is allowable. Physical activity that is age-appropriate, inclusive, and enjoyable, supports positive [physical](#) health outcomes and may promote a sense of belonging, when well-structured.²² Funds available under the Stronger Connections grant may support building programs, developing partnerships with local community-based programs that use evidence-based practices to combine physical wellness with mental and social well-being, and providing professional development on classroom physical activity or incorporating physical activity before and after school, among other possibilities.

C-13. How may funds be used to prevent or respond to identity-based hate and harassment?

Consistent with Federal civil rights laws,^h schools have a responsibility to adequately address discrimination, including harassment, based on race, color, national origin, sex, and disability in educational programs. As such, the Department encourages funds to be used to implement plans to prevent and respond to identity-based hate and harassment. Discrimination can take many forms

^h See Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.*; Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 *et seq.*; Section 504 of the Rehabilitation Act of 1975, 29 U.S.C. § 794 *et seq.*; and Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12131 *et seq.*

including verbal and non-verbal communications and harassment that are meant to ridicule, hurt, discriminate, single out, or exclude someone based on their identity, including race/ethnicity, national origin, disability, religion, gender, culture, language, sexual orientation, and more. Identity-based hate can range from microaggressions to blatant name calling or harassment. When adults encounter hate-based bullying or other harms based on prejudice, they have a responsibility to respond and should receive ongoing training and coaching to properly do so. Not responding to identity-based hate can disrupt learning, create unsafe learning environments, inflict short and long-term social and emotional harm, and make students feel unwelcome in schools and classrooms. Therefore, the Department encourages schools to:

- Ensure educators and students know what it means to be respectful, including knowing what it looks like and how it feels to be respected.
- Create schoolwide evidence-based definitions so students and educators can identify identity-based hate and have the tools to respond when a peer is in need.
- Teach students and educators how to ask for help when they experience bullying, harassment, or intimidation and cultivate [positive student-teacher relationships](#) to ensure each person has a trusted adult they can reach out to for help.
- Partner with families, community organizations representing historically marginalized populations and others to ensure the strategies are meeting the needs of all students.
- Create statements of support grounded in equity, prepare for and facilitate constructive classroom discussions, address harmful language and actions, and create space for ongoing learning.

Schools should also [implement MTSS](#), [PBIS](#), and other tools to prevent and respond to identity-based harassment. See Questions C-4, C-6, and C-11 for more information.

C-14. How may funds be used to provide related professional development to educators?

Stronger Connections funds may be used to provide teachers with ongoing professional development consistent with section 4108 of the ESEA. The Department encourages use of funds for programs that support educators in providing safe, welcoming, and inclusive learning environments, including a focus on how to build strong and trusting relationships with students. For example, educators should be trained in using evidence-based strategies²³ to create and sustain school safety and discipline policies that take a holistic, non-punitive, and non-exclusionary approach to supporting and responding to students' social, emotional, behavioral, mental health, and academic needs and address any trauma. Further, professional development can support educators in identifying and addressing any biases that may exist in themselves and in their school communities and help school teams to replace exclusionary discipline practices with supports that meet students' social, emotional, and mental health needs, including restorative practices²⁴ and positive behavioral intervention and supports.²⁵

To further support students' needs, LEAs are encouraged to provide educators job-embedded and ongoing professional development on topics such as:

- Establishing safe, healthy, and supportive environments for teaching and learning;
- Intervening in an appropriate manner to address bullying and harassment;
- Explicitly developing students' social, emotional, and academic skills, such as emotional self-regulation;

- Implementing a high-quality restorative practice program through training (e.g., one-on-one coaching, shadowing, learning through feedback program for teachers and administrators) to understand specific restorative techniques, the reasoning behind the shift from punitive to restorative approaches, and peace building activities;
- Actively engaging students in meaningful culturally and linguistically relevant learning experiences rooted in high academic expectations for all students;
- Providing supportive and specific feedback to encourage skill growth across all domains;
- Collaborating with colleagues within the school to ensure access and support from school counselors, psychologists, and trusted staff members;
- Collaborating with colleagues and professionals outside of school, such as youth workers and program staff from community-based partner organizations;
- Engaging students and their families in two-way communication and implementing practices that promote student agency and students' exercising their voices;
- Building routines during the school day, such as morning or closing meetings; and
- Regularly collecting, analyzing, and acting on data to identify key areas of risk and resilience, plan to support students, and recognize and address mental health risk factors.

Given that students connect throughout the school day with school support staff other than teachers, and that support staff can also model positive behavior and send positive messages to students,²⁶ professional development opportunities should be available for all staff. Professional development activities should provide uniform direction and messaging for all school staff and set conditions for whole-school approaches to nurturing safe and supportive learning environments. School support staff are essential to those efforts and can foster positive, trusting relationships with students and improve school climate by encouraging the involvement of parents and families in their child's education.

C-15. How may funds be used to provide professional development to support trauma-informed practices?

The Department encourages grantees to use funds for professional development that supports programs and activities that are allowable under ESEA section 4108. Section 4108(5)(B)(ii)(aa) specifically refers to trauma-informed practices in school-based mental health partnership programs, and section 4108(5)(D)(ii) supports "high-quality training for school personnel, including specialized instructional support personnel, related to effective and trauma-informed practices in classroom management." More broadly, trauma-informed practices directly support most of the activities identified in section 4108.

While the experience of trauma already was widespread before the pandemic, the impact of COVID-19 has been an additional traumatic event for many children and adults. SAMHSA's [Concept of Trauma and Guidance for a Trauma-Informed Approach](#) describes individual trauma as resulting from "an event, series of events, or set of circumstances that is experienced by an individual as physically or emotionally harmful or life threatening and that has lasting adverse effects on the individual's functioning and mental, physical, social, emotional, or spiritual well-being." In developing a trauma-informed approach consistent with the SAMHSA Guidance "a program, organization, or system that is trauma-informed realizes the widespread impact of trauma and understands potential paths for recovery; recognizes the signs and symptoms of trauma in clients, families, staff, and others involved with the system; and responds by fully integrating knowledge about trauma into policies, procedures, and practices, and

seeks to actively resist re-traumatization.” A trauma-informed approach refers to incorporating these principles into the overall organizational culture.

Trauma-informed practices include a wide-range of approaches. The SAMHSA Guidance includes six key principles: (1) Safety; (2) Trustworthiness and transparency; (3) Peer support; (4) Collaboration and mutuality; (5) Empowerment, voice, and choice; and (6) Appropriate practices based on cultural, historical and gender considerations, as well as disability. Many resources exist for building trauma-informed schools, including resources from the Department’s [National Center on Safe Supportive Learning Environments](#) and from the [Center on PBIS](#).

C-16. How may funds be used to provide related professional development to principals and other school leaders?

Stronger Connections funds may be used to provide professional development related to activities permissible under section 4108. Research is clear that principals are core to building and maintaining a strong school climate.²⁷ To implement and sustain evidence-based strategies school-wide, such as trauma-informed care, principals must have access to high-quality, research-based professional development that effectively positions them to implement this work. Research shows high-quality professional learning opportunities for principals can strengthen their ability to lead across a full range of responsibilities, empowering them to foster school environments in which adults and students thrive.²⁸ Examples of such job-embedded professional development include simulation-based training, cohort-based learning and network opportunities facilitated by the LEA, coaching and mentoring for novice principals, and using problems of practice as a process of inquiry. As with all high-quality professional development, these learning opportunities provided to principals should include ongoing feedback and be sustained.

Educators may also receive professional development on how to use a variety of data sources to identify areas of need related to the safety and health of students and where progress is being made. These areas may include:

- Chronic absenteeism;
- Bullying and harassment;
- Hate-based and other discriminatory incidents;
- School, campus, and family survey results;
- School visits to school specialists;
- Calls to community crisis centers;
- Supporting families in the community affected by substance use, immigration, incarceration, or domestic abuse;
- Grade retention;
- Improving learning outcomes, including credit accumulation;
- Community health factors; or
- Other indicators, such as a universal screening process to look for early indicators of social, emotional, and behavioral strengths and concerns.

C-17. How may funds be used to provide integrated support services for students?

LEAs are encouraged to use Stronger Connections funds to establish partnerships within the community to provide resources (e.g., mental and physical health services, parent engagement classes, housing assistance, recreational and youth development programs, and nutrition programs) and support for schools and strengthen relationships between schools and communities in order to improve student success. Integrated student services can provide a comprehensive response to children and youth who are experiencing serious mental health or behavioral challenges. Integrated student services are typically provided as the most intensive and individualized part of a MTSS and involve additional community collaborations. SEAs and LEAs may use an integrated student support liaison to help identify, secure, and coordinate these services and may consider seeking receive technical assistance through the [National Partnership for Student Success](#).

C-18. How may funds be used to develop early detection, screening, or warning systems to identify students who may be at risk or those in need of additional supports?

The Department encourages grantees to use funds to develop early detection, screening, or warning systems to identify students who may be at risk, a danger to themselves or others, or in need of additional supports, which are often part of implementing MTSS to proactively determine needs for student support. These early detection, screening, and warning systems are designed to collect data to identify students who may need additional supports to meet school expectations or students whose behavior, attendance, or academic performance indicate they may be at risk of not graduating.²⁹

More specifically, early warning indicator (EWI) systems can promote targeted engagement strategies in response to data from EWI systems.³⁰ EWI systems can track attendance, assignment completion, and grades. When viewed at the classroom and student levels, these data can strengthen a school's ability to provide specific and timely interventions. LEAs and schools also can collect data on students' successful transitions from preschool to elementary school, elementary school to middle school, middle school to high school, and high school to postsecondary education. For example, on-track indicators³¹ may assess how well students are making the transition into high school so that the schools can provide additional supports. Schools may want to consider implementing or enhancing MTSS that typically include: (1) school-wide supports; (2) progress monitoring; (3) tiered systems of academic and behavioral interventions; and (4) the use of evidence-based instructional and behavioral interventions.

C-19. How may funds be used to hire mental health professionals and other critical student support staff?

ESEA section 4108 allows funds to be used to "develop, implement, and evaluate comprehensive programs and activities" that foster safe, healthy, supportive, and drug-free environments that support student academic achievement. Therefore, Stronger Connections funds may be used to hire professionals who are necessary to implementing such programs. For example, ESEA section 4108(5)(B) describes school-based mental health services "which may be provided by school-based mental health services providers." These providers might include school psychologists, school counselors, social workers, or other professionals to supplement other such staff funded with non-Federal funds. In addition, ESEA section 4108(5)(F) and (G) describe activities such as designing and implementing plans to reduce discipline or implement positive behavioral supports in schools. These types of activities might

also require the involvement and specialized expertise of behavior specialists or other professionals. This may also include other professionals and school-based staff who provide mentoring and counseling or a site resource coordinator.

C-20. May funds be used to support mentors, integrated student support coordinators, post-secondary education transition coaches and student success coaches?

To the extent that such individuals will provide services that support K-12 student mental health and well-being, Stronger Connections funds may be used to hire staff into these roles, contract with external service-providers, train current staff, and support recruitment efforts. Research shows that high-quality programs that place trained adults in these roles can help to foster supportive learning environments and improve student engagement and overall wellbeing.³² LEAs pursuing these strategies may want to consider technical assistance offered through the [National Partnership for Student Success \(NPSS\)](#), which is partnering with the Department of Education and AmeriCorps to help expand, launch, and improve these programs, including by providing technical assistance to schools, LEAs, and organizations supporting schools in implementing high-quality programs that place and train caring adults in these roles to support students. The NPSS provides [technical assistance](#) and has published resources outlining how [States](#) and [districts](#) can establish partnerships to support these roles, as well as [voluntary quality standards](#) for these programs. The hiring of any additional personnel must comply with the statutory requirements described in Question B-10.

C-21. May funds be used for school-based police officers, law enforcement, or school resource officers (SROs)?

Yes. If an LEA chooses to use funds for this purpose, as a recipient of Federal funds, LEAs must ensure school-based officers (e.g., law enforcement, security, or school resource officers and others with arresting powers), like all school employees or other individuals with whom a recipient contracts or otherwise exercises some control over, comply with Federal civil rights laws that prohibit discrimination on the basis of race, color, national origin, sex, or disability.ⁱ

Across the country, there is wide variation in the roles of school-based police. Schools that choose to include or expand the presence of school-based police using Stronger Connections funds should implement high-quality practices in the training and use of SROs in schools, consistent with [the Guiding Principles for SROs](#) published by the U.S. Department of Justice. The Department encourages school officials to make decisions regarding whether to place school-based police in schools only after receiving significant community input. Schools that choose to use security or law enforcement personnel on school grounds should:

- Conduct a comprehensive vetting process that includes an interview panel that selects candidates from a diverse pool of high-quality security or law enforcement personnel who have

ⁱ Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin by recipients of Federal financial assistance. 42 U.S.C. §§ 2000d–2000d-7. Title IX of the Education Amendments of 1972 prohibits discrimination based on sex by recipients of Federal financial assistance. 20 U.S.C. §§ 1681 – 1688. Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990 both prohibit discrimination based on disability, the former by recipients of Federal financial assistance, the latter by State and local governments, regardless of whether they receive Federal funds. 29 U.S.C. § 794; 42 U.S.C. §§ 12131 –12134.

volunteered for the position and who have experience working with children and youth, as well as training as outlined below;

- Provide training and ongoing professional development on MTSS, de-escalation, alternatives to arrests, conflict resolution, restorative practices, proper referrals to educators and mental health professionals, child and adolescent development, civil rights, disability, emergency response, and more;
- Establish clear roles for law enforcement to ease the burden on officers so that they do not respond to situations that may not merit law enforcement intervention, such as prohibiting involvement in school disciplinary incidents that could otherwise be handled by school staff. Law enforcement should only be engaged in serious threats to school safety or serious criminal behavior that cannot be safely addressed through the school discipline process or as required by law. Doing so not only enhances public safety, but also public trust;
- Conduct community and family engagement, including by soliciting feedback on how to increase safety, and meaningfully responding to that feedback; and
- Implement accountability measures and data-driven annual evaluations of the program (See also [Guiding Principles for SROs](#)), including by collecting, maintaining, and analyzing data *and reporting disaggregated data including* by a student's race, ethnicity, age, sex, type of offense, English language learner status, and disability, regarding student interactions with law enforcement, *including referrals of students, arrests, and citations*, to ensure nondiscrimination based on disability, race, color, national origin, gender, or another protected class.

Schools that choose to include or expand the presence of school police should consider developing clear guidelines that address the above considerations, such as [memoranda of understanding](#) (MOUs). Stronger Connections funds may be used by an LEA to develop and implement such guidelines. Schools should also consider providing training for school-based police and educators on students' civil rights, on distinguishing behavior that can be properly handled by educators from conduct that cannot be safely addressed by the school's disciplinary process, and on developmentally appropriate strategies for building trusting relationships with students and families. Finally, LEAs should ensure accurate collection and reporting of disaggregated data regarding student referrals, arrests, and citations by school-based policy and other school staff.

As schools consider the use of funds for this purpose, they may choose to examine research suggesting that the presence of school-based officers can be associated with negative outcomes like increased chronic absenteeism, suspensions, expulsions, referrals to the criminal legal system, and arrests, especially for Black students and students with disabilities.³³ In the interest of mitigating such potential outcomes, schools and SROs should take proactive steps to regularly solicit feedback and collectively problem-solve with students, families, and community members to address concerns. Schools should consult the [Guiding Principles for SROs](#) published by the U.S. Department of Justice.

C-22. May funds be used for equipment such as surveillance cameras, metal detectors, and other physical or infrastructure-related security equipment or minor remodeling?

Yes. In determining whether Stronger Connections funds may be used for infrastructure-related security, SEAs must consider whether items meet the Federal regulatory definition of "equipment": "tangible personal property (including information technology systems) having a useful life of more than 1 year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established

by the non-Federal entity for financial statement purposes, or \$5,000.” 2 CFR 200.1. SEAs and LEAs must comply with 2 CFR 200.313 and 200.439 if such items meet the definition of “equipment.”

For the cost of installation of security equipment or minor remodeling to be considered allowable, it must meet the definition of “minor remodeling” under [34 CFR 77.1](#) and not require construction, renovation, or repair, which is a prohibited use of Stronger Connections funds. “Minor remodeling” means minor alterations in a previously completed building or the extension of utility lines, such as water and 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 alterations to buildings, building maintenance, or repairs.

If an LEA chooses to use Stronger Connections funds to install surveillance cameras, the LEA should have a clearly established policy on the use of video systems on school property. The LEA has a responsibility not to discriminate on the basis of race, color, national origin, sex, disability, age, or other protected classes when conducting surveillance and other security or safety activities using video systems. Furthermore, the LEA must comply with all applicable laws related to record maintenance and retention, and with data privacy and limitations on disclosure and use. As a best practice, the LEA should develop the policy surrounding the use of video systems in consultation with students, their families, and educators so that uses of the video systems are widely understood and privacy concerns are considered in the development of the policy. For additional information regarding video and privacy policies, please see [“FAQ on Photos and Videos under FERPA”](#) and [“School Resource Officers, School Law Enforcement Units, and the Family Educational Rights and Privacy Act \(FERPA\).”](#)

C-23. May funds be used to implement threat assessment systems or teams?

Yes, an LEA may choose to use Stronger Connections funds for this purpose. An LEA should consider evidence-based school safety interventions as part of a multifaceted, comprehensive school climate plan designed to improve student safety, health, well-being, and academic development. The Department encourages LEAs to take a comprehensive approach to school safety which should include meeting the needs of the whole child through strategies outlined prior to this section, which may include creating well-trained and diverse multidisciplinary teams. These teams should include certified mental health professionals as well as educators with significant knowledge of requirements under IDEA and civil rights protections. The approach should include providing the supports and interventions students need when they need them.

As a part of these efforts, LEAs should also provide early intervention and supports in a developmentally appropriate and preventative manner, to avert behavioral challenges before a potential threat of harm arises. This is especially important for underserved students which some research has suggested are more likely to be referred for threat assessments, such as students of color and students with disabilities.³⁴ When implemented well, early intervention and supports prevent threats rather than solely respond to them. An LEA might consider reframing this approach as an “early response” or “early intervention” model. To do so, it is important that any LEAs implementing such a system have a strong MTSS in place, which may include implementing a PBIS plan schoolwide. These frameworks are essential to ensuring that students who might be struggling or at-risk of harming themselves or others receive appropriate supports, services, and interventions before any potentially harmful or threatening behavior occurs.

Finally, LEAs implementing threat assessment models must comply with all Federal civil rights and education laws, including IDEA and Section 504 of the Rehabilitation Act. [Under IDEA](#) and Section 504, the procedural safeguards and right to a free appropriate public education (FAPE) for a child with a disability must be protected throughout any threat or risk assessment process. States and LEAs should ensure that school personnel involved in screening for, and conducting, threat or risk assessments of a child with disabilities are aware that the child has a disability and are sufficiently knowledgeable about the LEA's obligation to ensure FAPE to the child, including IDEA's discipline provisions and Section 504's obligations applicable to discipline.

D. Prohibited Uses of Funds

D-1. May Stronger Connections funds be used to arm teachers or other individuals, or to provide training in the use of weapons?

No. Section 13401 of the BSCA amended Section 8526 of the ESEA to prohibit the use of ESEA funds, including those under Stronger Connections, to provide to any person a dangerous weapon or training in the use of a dangerous weapon. A "dangerous weapon" as defined in section 930(g)(2) of title 18 of the United States Code is a weapon, device, instrument, material, or substance, animate or inanimate, that is used for, or is readily capable of, causing death or serious bodily injury, except that such term does not include a pocketknife with a blade of less than 2 1/2 inches in length. Accordingly, funds may not be used, for example, to purchase a firearm or to train teachers to use a firearm.

D-2. May funds be used for school construction?

No. BSCA Stronger Connections grants are appropriated for carrying out activities under subpart 1 of Part A of Title IV of the ESEA, specifically for activities under ESEA section 4108. ESEA section 8526(1) prohibits using funds under the ESEA "for construction, renovation, or repair of any school facility, except as authorized under [the ESEA]," and there is no specific authorization for construction, renovation, or repair in ESEA Title IV, Part A. Accordingly, Stronger Connections funds may not be used for school construction.

D-3. May an SEA or LEA that receives Stronger Connections funds transfer those funds, in whole or in part, to an authorized ESEA program consistent with section 5103 of the ESEA?

No. An SEA or LEA that receives a Stronger Connections award may not transfer funds out of that award to another authorized program. The State and Local Transferability Act, codified in Title V, Part A of the ESEA, provides authority for States and LEAs to transfer funds allotted under certain ESEA formula grant programs, including Title IV, Part A. However, Stronger Connections was enacted solely for the purpose of supporting the safety and health of students. Accordingly, the statute requires SEAs and LEAs to use funds to support activities under section 4108 of the ESEA. Moreover, such LEA transfers would undermine the competitive award process by allowing a subgrantee to avoid implementing the activities in its "winning" application.

E. Equitable Services

E-1. Must an SEA that reserves Stronger Connections funds for State-level activities and an eligible LEA receiving funds provide for the equitable participation of private school children and educators?

Yes. Because this funding was provided through Title IV, Part A, each SEA reserving funds for State-level activities under the Stronger Connections program and each eligible LEA receiving a Stronger Connections subgrant must, after timely and meaningful consultation with appropriate private school officials, provide eligible private school students and educators services and other benefits that are equitable in comparison to services and other benefits provided with Stronger Connections funds to public school students and educators. (ESEA section 8501(a)(1), (3)(A)). After timely and meaningful consultation, as described further in Questions E-2 and E-3, an SEA or LEA makes the final decisions with respect to the services it will provide to eligible private school students and educators (34 C.F.R. § 299.7(b)(3)).

E-2. When and with whom must an SEA consult regarding equitable services?

If an SEA reserves Stronger Connections funds for State-level activities, it must consult with private school officials regarding the equitable services it will provide to eligible students with those funds before the SEA makes any decision that impacts the participation of private school students and teachers in the program (ESEA section 8501(a)(1) and (c)(3)). Generally, an SEA should approach the provision of equitable services with State-level funds under Stronger Connections in the same manner as an SEA provides equitable services under Title IV, Part A, except that the services provided by the SEA must specifically support activities under section 4108 of the ESEA. An SEA has discretion in determining who are appropriate private school officials with whom to consult at the State level. For example, an SEA might reach out to State-level private school organizations that fairly represent private schools in the State to assist it in these efforts.

E-3. When and with whom must an LEA consult regarding equitable services in developing its subgrant application?

An eligible LEA applying for a Stronger Connections subgrant must consult with appropriate private school officials before the entity makes any decision that affects the opportunities of eligible private school children and educators to participate (ESEA section 8501(c)(3)). Such consultation might include a brief survey of non-public schools or other information gathering to indicate the schools' interest in participating and the population to be served. Such consultation will allow the LEA to consider the needs of all students and educators—both public and private—in developing its application, and to include the projected costs for equitable services in the application.

If an LEA is successful in receiving a Stronger Connections subgrant, it must continue to consult with interested private school officials on the specific services the LEA will provide students and educators, consistent with the LEA's approved application, including any limitations or priorities established by the SEA.

E-4. How do limitations or priorities established by an SEA affect the provision of equitable services?

Any limitations or priorities that an SEA establishes for its Stronger Connections competition may affect the students eligible for equitable services, the types of services available, and the private schools in which those services may be provided. For example, if an SEA limits the Stronger Connections competition to support the provision of mental health services to students and educators, then the provision of equitable services would be circumscribed in a similar manner and consultation would focus on the mental health needs of students and educators in private schools. Likewise, if an SEA limits services to public schools that have directly experienced a violent event, such limitation would also apply to private schools.

E-5. How does an LEA determine the amount of funds to request for equitable services to private school students and educators in its subgrant application?

Section 8501(a)(4) of the ESEA requires an LEA to ensure that its expenditures for equitable services for eligible private school students and educators under covered ESEA programs are equal on a per-pupil basis to the expenditures for participating public school students and educators, taking into account the number and needs of the eligible private school students and educators. After timely and meaningful consultation with appropriate private school officials, an LEA could choose to calculate equal expenditures strictly on the basis of the relative enrollments of public and private schools in the LEA on the assumption that these numbers accurately reflect the relative needs of children and educators in public and private schools. Alternatively, an LEA could choose to use other factors relating to the needs of public and private school children and not base its equal expenditures only on relative enrollments. For example, if an SEA targets services to a specific group of schools such as those that experienced a violent event, then the LEA would determine expenditures for equitable services consistent with that targeting.

Endnotes

- ¹ Mapp, K. L., & Kuttner, P. J. (2013). Partners in Education: A Dual Capacity-Building Framework for Family-School Partnerships. SEDL.
- ² SEAs are encouraged to review the [National Standards for Family-School Partnerships](#) for evidence-based resources to help SEAs and LEAs engage with families.
- ³ Title VI of the Civil Rights Act of 1964.
- ⁴ SEAs can find additional resources related to evidence-based practices when engaging with families by reviewing the National Standards for Family-School Partnerships.
- ⁵ A number of resources exist to support SEAs in designing evaluations. Examples include (a) U.S. Department of Education (2014). Evaluation Matters: Getting the Information You Need from Your Evaluation. Office of Elementary and Secondary Education. <https://www2.ed.gov/about/offices/list/oesse/sst/evaluationmatters.pdf> and (b) the Regional Educational Laboratories' *Program Evaluation Toolkit* at <https://ies.ed.gov/ncee/rel/Products/Region/central/Resource/100644>.
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- ²¹ See: Return to School Roadmap: Development and Implementation of Individualized Education Programs in the Least Restrictive Environment (Sept. 30, 2021). Also, OSEP DCL: Implementation of IDEA Discipline Provisions (2022); OSERS Q&A: Addressing the Needs of Children with Disabilities and IDEA's Discipline Provisions (July 19, 2022); and OCR DCL: Restraint and Seclusion of Students with Disabilities (2016).
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