



U.S. Department of Education
Office of State Support
Office of Elementary and Secondary Education

SUPPORTING SCHOOL REFORM BY LEVERAGING FEDERAL FUNDS IN A SCHOOLWIDE PROGRAM

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Title I, Part A

- Provides Supplemental Federal funds to ensure all students have **fair, equal, and significant** opportunities to obtain a high-quality education and reach at minimum proficiency on challenging state academic achievement standards and state academic assessments.
- Focused on improving the academic achievement of **low-achieving students in schools with high concentrations of children from low-income families** and is governed by statutory and regulatory requirements of Title I, Part A of ESEA.



Title I – Fast Facts

- Was initiated in 1965 as part of the War on Poverty.
- Serves more than 24 million students nationwide.
- Serves students Pre-K through 12th grade.
- Is the single largest pre-college Federal education program with over \$14 billion allocated in recent years.
- Approximately 66,000 schools nationwide operate Title I schools. 70% of those schools operate schoolwide programs.



Two Types of Title I Programs

- **Targeted Assistance**
 - Supplemental education services to eligible students with the greatest need.
- **Schoolwide**
 - Comprehensive program designed to upgrade the entire educational program in order to improve achievement of the lowest-achieving students.
 - a school with poverty percentage of 40% or more.



Targeted and Schoolwide

Targeted Assistance Schools

- **Services must be targeted to specific at-risk students**
- **Only eligible students may participate in Title I-funded services**
- **Use of funds must be consistent with specific Title I rules**

Schoolwide Program Schools

- All students may participate in Title I-funded initiatives
- Maximizes flexibility in using Federal funds
- Serves as a vehicle for whole-school reform with focus on improving achievement of lowest-achieving students
- Addresses student needs through a schoolwide plan based on a comprehensive needs assessment



Benefits of a Schoolwide Program

- Serving all students
- Providing services that need not be supplemental
- Consolidating Federal, State, and local funds



Implementing a Schoolwide Program

There are three basic components of a schoolwide program that are essential to effective implementation:

- Conducting a comprehensive needs assessment of the entire school,
- Preparing a comprehensive schoolwide plan; and
- Annually reviewing the schoolwide plan.



Dispelling the Myth

Myth	Explanation of Law
<p>Title I funds may only be used to support reading and math instruction.</p>	<p>Title I funds may be used in a schoolwide program to support academic areas that the school's needs assessment identifies as needing improvement.</p>



Dispelling the Myth

Myth

Title I funds may only be used to provide remedial instruction.

Explanation of Law

The purpose of a schoolwide program is to upgrade the entire educational program in the school in order to raise the achievement of the lowest-achieving students. At times, this may be best achieved by preparing low-achieving students to take advanced courses



Dispelling the Myth

Myth	Explanation of Law
<p>Title I funds may only be used to serve low-achieving students.</p>	<p>Title I funds may be used to upgrade the entire educational program in a school and, in doing so, all students may benefit from the use of Title I funds. However, consistent with the purpose of Title I, the reason to upgrade the entire educational program in a school is to improve the achievement of the lowest-achieving students.</p>



Dispelling the Myth

Myth

If a school does not consolidate funds, Title I funds may only be used to provide services in a pull-out setting.

Explanation of Law

A school need not use Title I funds to provide services only in a pull-out setting, although this practice is not prohibited either.



Dispelling the Myth

Myth	Explanation of Law
<p>Title I funds may only be used for instruction.</p>	<p>Title I funds may be used for activities and strategies designed to raise the achievement of low-achieving students identified by a school's needs assessment and articulated in the school's comprehensive schoolwide plan.</p>



Dispelling the Myth

Myth	Explanation of Law
<p>Title I funds may not be used to support activities that are “required by law,” were previously supported with State or local funds, or are provided to non-Title I students with State or local funds.</p>	<p>A schoolwide program school does not need to demonstrate that Title I funds are used only for activities that supplement, and do not supplant, those the school would otherwise provide with non-Federal funds.</p>



Dispelling the Myth

Myth

Title I funds may not be used to support children below kindergarten or the age of compulsory education.

Explanation of Law

A schoolwide program school may use Title I funds to operate, in whole or in part, a preschool program to improve cognitive, health, and social-emotional outcomes for children below the grade at which the LEA provides a free public elementary education. All preschool children who reside in the school's attendance area are eligible to participate.



Dispelling the Myth

Misunderstanding

Individuals with Disabilities Education Act (IDEA) Part B funds may not be consolidated in a schoolwide program.

Explanation of Law

A schoolwide program school may consolidate funds received under Part B of the IDEA. (Please see the discussion on consolidating Title I funds with other Federal, State, and local funds in a schoolwide program below regarding limitations on the amount of Part B funds that may be consolidated.) A school that consolidates funds under Part B may use those funds in its schoolwide program for any activities under its comprehensive schoolwide plan but must comply with all other requirements of Part B of the IDEA.



Safeguarding the Interests of Historically Underserved Populations

- A comprehensive schoolwide plan must include strategies for —
 - ✓ meeting the educational needs of historically underserved populations; and
 - ✓ addressing the needs of all students but particularly the needs of low-achieving students and those at risk of not meeting the State's standards who are members of the target population of any program included in the schoolwide plan.

- A schoolwide program must provide effective, timely additional assistance to students who experience difficulty mastering the State's academic achievement standards.



Safeguarding the Interest of Historically Underserved Populations

- An LEA must ensure that each schoolwide program school receives a basic level of funds or resources from non-Federal sources to provide services that are required by law for students with disabilities and English Learners before using Title I funds in the school.
- An LEA operating a schoolwide program must comply with all other applicable laws, including: civil rights laws; laws affecting the education of English Learners; and laws affecting the education of students with disabilities, such as the IDEA and Section 504 of the Rehabilitation Act of 1973.
- If a schoolwide program consolidates Federal funds, it must ensure that it meets the intent and purposes of each Federal program whose funds it consolidates.



Safeguarding the Interest of Historically Underserved Populations

- Before a schoolwide program school may consolidate Title I, Part C Migrant Education Program (MEP) funds, it must, in consultation with migrant parents, an organization representing those parents, or both, first meet the unique educational needs of migrant students that result from the effects of their migratory lifestyle, and those other needs that are necessary to permit these students to participate effectively in school. The school also must document that these needs have been met.
- Before a schoolwide program school may consolidate Title VII, Part A, Subpart 1 Indian Education Program funds, the LEA's parent committee must approve the inclusion of those funds .



Consolidating Federal, State, and Local Funds

- By consolidating funds in a schoolwide program, a school can more effectively design and implement a comprehensive plan to upgrade the entire educational program in the school as identified through a comprehensive needs assessment.
- When a school consolidates funds in a schoolwide program, those funds lose their individual identity and the school may use the funds to support any activity of the schoolwide program without regard to which program contributed the specific funds used for a particular activity.
- Each SEA must encourage schools to consolidate funds in a schoolwide program and must eliminate State fiscal and accounting barriers so that these funds can be more easily consolidated.



Advantages of Consolidating Funds

- Flexibility to allocate all available resources effectively and efficiently.
- A school is not required to meet most of the statutory and regulatory requirements of the specific Federal programs included in the consolidation, **provided it meets the intent and purposes of those programs.**
- A school is not required to maintain separate fiscal accounting records by Federal program that identify the specific activities supported by each program's funds.
- Simplified time and effort documentation.



Consolidating Funds & Part B of the IDEA

The IDEA provides a straightforward formula for LEAs and their schools that wish to consolidate a portion of their IDEA Part B funds in any fiscal year to carry out a schoolwide program—



Consolidating Funds & Part B of the IDEA

- First, the LEA determines the amount of funds it received under the IDEA section 611 and 619 programs.
- Second, the LEA must divide the total amount of its IDEA grants by the number of children with disabilities in the jurisdiction of the LEA.
- Third, the LEA then multiplies this figure by the number of children with disabilities who will be participating in the schoolwide program.



IDEA Conditions

IDEA places the following conditions on LEAs and schools that consolidate IDEA funds in a schoolwide program:

- ✓ The IDEA funds must still be counted as Federal funds for IDEA's excess cost and supplement not supplant calculations.
- ✓ Regardless of how the IDEA funds are expended, children with disabilities in a schoolwide program school must:
 - receive services in accordance with a properly developed individualized education program (IEP); and
 - be afforded all of the rights and services guaranteed to children with disabilities and their parents under the IDEA.



Making a Difference: Using Federal Funds to Supplement School Reform

- The supplement not supplant requirement does not apply to a schoolwide program school.
- The presumptions used to determine if supplanting has occurred do not apply to the use of Title I funds in a schoolwide program school.
- However, in order for Federal funds to make a difference in supporting school reform in a schoolwide program, they must supplement those funds the school would otherwise receive.



Making a Difference: Using Federal Funds to Supplement School Reform

- To ensure that Federal funds have the opportunity to make a difference, a schoolwide program relies on the equitable distribution of non-Federal funds.

- Equitable distribution of non-Federal funds requires that—
 - ✓ **A schoolwide program school shall use Title I funds only to supplement the amount of funds that would, in the absence of the Title I funds, be available from non-Federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and English Learners.**

This requirement ensures that the Federal funds a schoolwide program school receives do not replace non-Federal funds the school would otherwise receive if it were not operating a schoolwide program.



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Examples of Equitable Distribution of Non-Federal Funds



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Example 1: Distribution of non-Federal resources based on characteristics of students

This form of equitable distribution is generally referred to as a “weighted per pupil” funding formula.



Example 1

Assume:

- Allocation/student = \$7,000
- Additional allocation/student from a low-income family = \$250
- Additional allocation/English Learner = \$500
- Additional allocation/student with a disability = \$1,500
- Additional allocation/preschool student = \$8,500

In a school of 450 students, including 200 students from low-income families, 100 English Learners, 50 students with disabilities, and 20 preschool students, the school would be expected to receive \$3,495,000 in non-Federal resources based on the following calculations:



Example 1

Category	Calculation	Amount
Allocation/student	$450 \times \$7,000$	\$3,150,000
Allocation/student from low-income family	$200 \times \$250$	\$50,000
Allocation/English Learner	$100 \times \$500$	\$50,000
Allocation/student with a disability	$50 \times \$1,500$	\$75,000
Allocation/preschool student	$20 \times \$8,500$	\$170,000
		\$3,495,000



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Example 2: Distribution of non-Federal resources based on staffing and supplies



Example 2

Assume:

- 1 teacher per 22 students (\$65,000/teacher)
- 1 principal/school (\$120,000)
- 1 librarian/school (\$65,000)
- 2 guidance counselors/school (\$65,000/guidance counselor)
- \$825/student for instructional materials and supplies (including technology)

In a school of 450 students, the school would be expected to receive \$2,051,250 in non-Federal resources based on the following calculation



Example 2

Category	Calculation	Amount
1 principal	1 x \$120,000	\$120,000
1 librarian	1 x \$65,000	\$65,000
2 guidance counselors	2 x \$65,000	\$130,000
21 teachers	21 x \$65,000	\$1,365,000
Materials, supplies	450 x \$825	\$371,250
		\$2,051,250



A Word of Caution...

There are two situations in which an LEA's use of Title I funds would likely not be supplemental even if the LEA distributes non-Federal funds according to the examples above. As a result, the LEA would not be able to use Title I funds to operate a schoolwide program.

- An LEA does not have sufficient non-Federal funds to provide even the most basic education program in all its schools.
- An LEA is required by State or local law to provide funding for a specific purpose for all students.



Exclusion of Non-Federal Funds from Supplanting Determinations

LEAs may exclude from supplanting determinations *supplemental* non-Federal funds expended in any school for programs that meet the intent and purposes of Title I.

- A program meets the intent and purposes of Title I if it either —
 - ✓ Is implemented in a school with at least 40 percent poverty;
 - ✓ Is designed to promote schoolwide reform and upgrade the entire educational operation of the school;
 - ✓ Is designed to meet the educational needs of all students in the school, particularly those who are not meeting State standards; and
 - ✓ Uses the State's assessment system to review the effectiveness of the program;

OR

- ✓ Serves only students who are failing, or most at risk of failing, to meet State standards;
- ✓ Provides supplementary services to participating students designed to improve their achievement; and
- ✓ Uses the State's assessment system to review the effectiveness of the program.



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Examples of the Exclusion Provision in a Schoolwide Program School



Examples of Exclusion

- An LEA offers after-school tutoring for any student who scores below proficient on the State's mathematics assessment.
- Paying for eligible students in a schoolwide program school with Title I funds and eligible students in a non-Title I school with supplemental local funds would not violate the schoolwide program supplement not supplant requirement.
- This is true even though the schoolwide program would not receive its share of the supplemental local funds to provide tutoring to eligible students.
- Rather, the local funds to provide tutoring in the non-Title I school would qualify for the exclusion because they are supplemental and benefit students who, by virtue of being non-proficient in mathematics, are failing to meet the State's mathematics standards.



Examples of Exclusion

- An SEA identifies in its ESEA flexibility request all “F” schools in the State as priority schools.
- An LEA would not violate the schoolwide program supplement not supplant requirement if it uses Title I funds to implement interventions consistent with the turnaround principles in its Title I priority schools and uses supplemental non-Federal funds to provide the same interventions in its non-Title I priority schools.



Examples of Exclusion

This exclusion provision applies even if the activity is required by State or local law. For example:

- A State law requires all third-grade students to meet the State's proficient achievement standard in reading/language arts in order to be promoted to fourth grade.
- Any student who is not proficient at the start of third grade must be provided 90 minutes of supplemental services designed to improve his/her reading proficiency.
- An LEA would not violate the schoolwide program supplement not supplant requirement if it uses Title I funds to implement the required-by-law reading services in a schoolwide program school and uses supplemental non-Federal funds to provide the same services in its non-Title I schools.
- Non-Federal funds to provide the reading services would qualify for the exclusion because they are supplemental and benefit only students who are failing to meet the State's reading/language arts standards.
- This is true even though the schoolwide program school would not receive its share of non-Federal funds to meet the State law requirement. This example is distinguishable from the second example under "a word of caution" above because the required-by-law services are supplemental and targeted at only at-risk students — *i.e.*, those for whom Title I is intended — rather than all students.



Existing Guidance on Schoolwide Programs

- *Title I Fiscal Issues* (Feb. 2008) (available at <http://www2.ed.gov/programs/titleiparta/fiscalguid.pdf>) (provides information on how supplement not supplant operates in a schoolwide program and information on consolidating funds in a schoolwide program).
- *Notice Authorizing Schoolwide Programs to Consolidate Federal Education Funds and Exempting Them From Complying With Statutory or Regulatory Provisions of Those Programs*, 69 FR 40360-64 (July 2, 2004) (available at <http://www.gpo.gov/fdsys/pkg/FR-2004-07-02/pdf/04-15121.pdf>) (provides information regarding what Federal education programs may be consolidated in a schoolwide program and how a school can ensure that it meets the intent and purposes of the Federal programs included in the consolidated schoolwide program).
- *Using Title I, Part A ARRA Funds for Grants to Local Educational Agencies to Strengthen Education, Drive Reform, and Improve Results for Students* (Sept. 2009) (Available at: <http://www.ed.gov/policy/gen/leg/recovery/guidance/titlei-reform.pdf>.) (Provides information regarding factors to consider in selecting how to use Title I funds (regular and ARRA) to carry out a Title I program.)



Existing Guidance on Schoolwide Programs

- *Designing Schoolwide Programs* (Mar. 2006) (provides details on conducting a comprehensive needs assessment, developing and implementing a schoolwide plan, and revising a schoolwide program) (available at <http://www.ed.gov/policy/elsec/guid/designingswpguid.doc>).
- *Serving Preschool Children Through Title I Part A of the Elementary and Secondary Education Act of 1965, as Amended* (Oct. 2012) (available at <http://www2.ed.gov/policy/elsec/guid/preschoolguidance2012.pdf>).
- *Supporting School Reform By Leveraging Federal Funds in a Schoolwide Program* (July , 2015) (Available at: www2.ed.gov/policy/elsec/guid/eseatitleiswguidance.pdf)



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