

Maximizing Title I Funds: The Schoolwide Program Model

The schoolwide program model has long been a part of federal law. It was designed to facilitate whole school improvements to increase academic achievement, although it has rarely been implemented to its full potential. Additionally, the schoolwide model can be a powerful tool used to increase fiscal flexibility for schools, particularly for those implementing comprehensive improvement and turnaround strategies.

What is a Schoolwide Program Model?

The schoolwide program is authorized under Title I, Part A. It is a service delivery model for Title I schools that allows schools to support costs associated with whole school improvement to raise the achievement of all students, particularly those most academically at-risk.

Targeted Assistance vs. Schoolwide Model

Unlike a Targeted Assistance school where funds may *only* be spent on Title I students, a schoolwide program school may use Title I funds flexibility to upgrade its entire educational program. If a service or good is indicated as needed based upon the school's needs assessment and is consistent with the schoolwide plan it typically can be paid for using Title I funds.

Additionally, unlike a Targeted Assistance School, a schoolwide program school does not need to show individual Title I funded activities are extra. The usual three presumptions of supplanting do not apply to schoolwide program schools. Instead, a "supplemental funds" test applies. Under the supplemental funds test, a schoolwide program school must receive all of the state and local resources it would be entitled to receive if it did not participate in Title I. In other words, a school district may not reduce a schoolwide program school's state and local funding because the school received Title I funds.

How do I Implement a Schoolwide Program Model?

- Conduct a comprehensive needs assessment
- Create a schoolwide plan
- Conduct an annual review of the effectiveness of the schoolwide program and revise the plan as necessary.

Additionally, the district must satisfy the supplemental funds test referenced above.

Conclusion

The schoolwide program model gives eligible schools the opportunity to use funds in a broader way. If a school has selected to operate the schoolwide program model, has conducted a comprehensive needs assessment, has developed a schoolwide plan, and satisfies the supplemental funds test, it can make use of Title I funds in a variety of ways.

OVERVIEW

Which Schools Are Eligible to Operate Schoolwide Programs?

Eligibility Criteria for Various Title I Schools

Steps to Create a Schoolwide Program

- Comprehensive Needs Assessment
- Schoolwide Plan
- Annual Evaluation

Ways a School might use Title I funds in a Schoolwide Program

How to Meet Fiscal Requirements

- Supplemental Funds Test
- Comparability
- Maintenance of Effort
- Time and Effort

How Can Districts and Schools Maximize Flexibility?

- Examples of potential uses of funds

Which Schools Are Eligible to Operate Schoolwide Programs?

Title I schools may operate a schoolwide program if at least 40 percent of the students in the school are from low-income families. Additionally, any Title I school that has been designated as a *priority or focus* school may operate a schoolwide program. As defined by Louisiana’s ESEA Flexibility waiver, a *priority* school is a school that has been transferred to the Recovery School District (RSD). A *focus* school is any school earning an “F” Letter Grade or any high school with a cohort graduation rate below 60 percent.

Summary of the Eligibility Criteria for Various Title I Schools

School Status	Poverty Threshold
Priority School	None
Focus School	None
Priority High School; graduation rate below 60%	None
Other Title I Schools	40%

Steps to Create a Schoolwide Program

1. Conduct a **comprehensive needs assessment** to determine how students are performing academically and what factors are preventing success;
2. Develop a **schoolwide plan** that identifies specific goals and describes the strategies the school will use to meet the needs identified through the needs assessment.
3. Conduct an **annual evaluation** of the schoolwide plan.

Comprehensive Needs Assessment

The goal of the comprehensive needs assessment is to determine:

- How students are performing academically on statewide assessments
- Where teaching and learning needs to be improved in order to help students meet state standards
- What students need in order to achieve academically

This process helps schools identify performance trends so academic leaders can prioritize the needs of their children before they design strategies to improve academic outcomes.

The comprehensive needs assessment must consider the academic performance of all students including the following subgroups:

- Economically disadvantaged students
- Students from major racial and ethnic groups
- Students with disabilities
- Students with limited English proficiency
- Migrant students

The school must consider student performance on the state assessment, but should also consider other data including enrollment counts, dropout rates, graduation rates, school demographics, classroom observations and/or surveys of students, teachers, parents and community attitudes and perceptions.

The comprehensive needs assessment must be developed with the participation of individuals who will carry out the schoolwide program plan. This includes but is not limited to principals, assistant principals, teachers, counselors, school social workers and paraprofessionals. The school must document how it conducted the needs assessment, the results it obtained, and the conclusions it drew from those results.

Schoolwide Plan

Once the school has identified its needs, it must develop a plan describing how it will address them. If your school has already created a schoolwide plan, formerly referred to as a school improvement plan by LDOE, a new plan is not needed! If your school has not completed this process, please reference the Schoolwide Plan Checklist in the

appendices. The plan is no longer required to be submitted and approved by LDOE, but must be kept on file at the district.

A school may not operate a schoolwide program unless it has a schoolwide plan in place. The plan should be aligned to the results of the needs assessment.

As required by Section 1114 of ESEA, schoolwide plans must include the following 10 components:

1. **A comprehensive needs assessment.**
2. **Schoolwide reform strategies** that provide opportunities for all students to meet state standards. These strategies should be research-based and designed to:
 - Strengthen the core academic program in the school;
 - Increase the amount and quality of learning time;
 - Provide an enriched and accelerated curriculum;
 - Meet the educational needs of historically underserved populations;
 - Address the needs of all students in the school, particularly low-achieving students; and
 - Be consistent with state and local improvement plans, if any.
3. Plans for ensuring **instruction by highly qualified teachers.**
4. Plans for providing **high-quality and ongoing professional development** for teachers, principals, paraprofessionals and, if appropriate, pupil services personnel, parents, and other staff to enable all students in the school, particularly low-achieving students; and
5. Strategies to **attract high-quality highly qualified teachers to high-need schools.**
6. Strategies to increase **parental involvement.**
7. Plans for **assisting preschool children transition from early childhood programs.**
8. Measures to **include teachers in decisions regarding the use of academic assessments** to provide information on, and to improve, the achievement of individual students and the overall instructional program.
9. Activities to provide **effective, timely additional assistance to struggling students**, including measures to ensure students' difficulties are identified on a timely basis and to provide sufficient information on which to base effective assistance.
10. **Coordination and integration of federal, State, and local services and programs**, including programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

Incorporating the required components into the schoolwide plan may require coordination with the district level leadership. For example, a district may carry out professional development activities that can be incorporated into component 4. Similarly, districts may conduct teacher recruitment, hiring and placement activities that can be incorporated into components 3 and 5. The plan should reflect all resources supported by the schoolwide plan, whether those resources are delivered by the district or by the school.

Annual Evaluation

The school must conduct an annual review of the strategies in the schoolwide plan to determine if they are contributing to the desired outcomes. One way these desired outcomes may be considered is in terms of improvement in student

achievement. Another way is in terms of increases in other activities that lead to increased student achievement, such as greater parental involvement or more high-quality professional development. Using the annual evaluation results for making data-based decisions may increase the effectiveness of the plan.

Ways a school might Use Title I Funds in a Schoolwide Program?

The goal of the schoolwide model is to provide Title I schools with the flexibility necessary to support improved academic achievement based on student needs. To achieve this goal, federal law permits schoolwide program schools to spend their Title I funds to upgrade their educational programs. For example, Title I schoolwide funds should be spent consistently with the school's schoolwide plan and address needs identified through the comprehensive needs assessment.

Title I funds can be used to implement activities identified in Louisiana's ESEA Flexibility Waiver, provided they are identified through the needs assessment and are consistent with the school's schoolwide plan. These activities may include, for example, professional development in the common core standards or preparation for advanced placement courses.

[NOTE TO LDE: It may be helpful to give a list/examples of other permissible costs – for example, upgraded curricular materials, school climate, etc. Also, some impermissible costs, and the reasoning as to why they are impermissible, might be helpful as well.]

What Must a District Do To Meet Fiscal Requirements?

- **Supplemental funds test for schoolwide programs**

In a Title I targeted assistance school, compliance with Title I's supplement not supplant requirement is tested on a cost-by-cost basis to make sure each cost charged to Title I provides something "extra" for Title I students. However, schoolwide programs are governed by a different test – the law calls this test a "supplemental funds" test. In a schoolwide program, Title I funds must supplement the funds that would, in the absence of Title I, be made available from state or local sources for the school. To meet this test, the district must demonstrate that each Title I schoolwide program school is receiving all of the state and local funds it would receive in the absence of Title I. A district may do this by showing it used its regular procedures for distributing funds and resources for all of its schools, and did not reduce a school's state or local allocation because it received Title I funds.

Once a district satisfies this supplemental funds test, a schoolwide program school may use Title I funds to support any educational cost consistent with its needs assessment and schoolwide plan. **The three presumptions of supplanting do not apply to schoolwide schools;** therefore, the fact that a cost relates to a state or local mandate, was previously supported with non-federal funds, or benefits all students, **does not necessarily constitute supplanting in a schoolwide program school.** The school does not have to show a specific cost is supplemental or one the school would not have supported with state and local funds.

Supplemental Funds Test - Examples

School districts allocate state and local money to schools in many different ways. Here are two examples based on two different allocation methods. (Both examples are simplified versions of allocation formulas for illustration purposes only.)

Example 1 – Allocations Based on Staffing/Supply Assumptions

A district allocates funds using following assumptions:

- 1 teacher per 25 students (teacher position = \$50,000)
- 1 principal per building (principal position = \$75,000)
- \$25 per student for technology costs
- \$50 per student for instructional materials

If a school has 300 students, the school would be expected to receive \$697,500 in state/local funds based on the following calculation:

Calculation	Category	Amount
12 x \$50,000	Funding for 12 teacher positions	\$600,000
1 x \$75,000	Funding for 1 principal position	\$75,000
300 x \$25	Per pupil allocation for technology	\$7,500
300 x \$50	Per pupil allocation for instructional materials	\$15,000
		\$697,500.00

To meet the supplemental funds test the district would have to show it applied the formula to all of its schools, regardless of whether a school receives federal funds or not.

A district would violate supplemental funds test, for example, if it gave Title I schools less per pupil for, or increased the teacher/student ratio allocation because it could fund expenses with Title I funds.

Example 2 – Allocations Based on Weighted Per-Pupil Formula

A district allocates funds using the following formula:

- Basic per-pupil allocation: \$5,000
- Additional allocation per Low Income/At-Risk student: \$500
- Additional allocation per Limited English Proficient student: \$700
- Additional allocation per special education student: \$1,500

If a school has 500 students, including 250 low income students, 100 English Language Learners, and 50 students with disabilities, the school would be expected to receive \$2,770,000 in state/local funds based on the following calculation:

Calculation	Category	Amount
500 x \$5,000	Base funding amount for 500 students	\$2,500,000
250 x \$500	Funding based on additional allocation for 250 students that are low-income/at-risk	\$125,000
100 x \$700	Funding based on additional allocation for 100 students that are English Language Learners	\$70,000

50 x \$1,500	Funding based on additional allocation for 50 students served by special education	\$75,000
		\$2,770,000.00

To meet the supplemental funds test the district would have to show it applied the formula to all of its schools, regardless of whether a school receives federal funds or not.

A district would violate supplemental funds test, for example, if it only gave a Title I school the base amount per student of \$5,000, and denied the school the extra \$700/per student for English Language Learners because the school received Title I funds.

- **Comparability**

Districts must comply with comparability requirements in a schoolwide program school. Districts should submit a written assurance to LDOE verifying that it has established and implemented the following: (1) District-wide salary schedule; (2) Policy to ensure equivalence among schools in teachers, administrators, and other staff; and (3) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. Districts must keep records to document that the salary schedule and policies are implemented annually and result in equivalence among schools.

- **Maintenance of Effort**

The district must continue to maintain the level of state and local funds yearly for Maintenance of Effort requirements to receive its full Title I allocation.

- **Time and Effort**

Districts must maintain time and effort records to demonstrate the amount of time spent on grant activities. The programs included in the schoolwide plan constitute a single cost objective because the schoolwide plan is a single initiative to upgrade the school’s education program. An employee working only on schoolwide plan activities (single cost objective) must keep a semi-annual certification. If an employee works on schoolwide plan activities and other program activities not in the schoolwide plan (multiple cost objectives), a monthly PAR must be maintained.

How Can Districts and Schools Maximize Flexibility?

Title I schools operating a schoolwide program may consolidate funds under Title I, Part A with other federal, state, and local funds to upgrade the school’s entire educational program. Consolidating funds in a schoolwide program permits schools to spend other federal funds flexibly based upon school need. For example, a district may choose to allocate Title II funds to schools to support schoolwide initiatives (as opposed to retaining the Title II funds at the central level). If a schoolwide school then consolidates Title II funds with its Title I funds, the school would be permitted to use those

consolidated funds on costs indicated as necessary by the school's needs assessment and schoolwide plan. In other words, if Title II funds are consolidated, those funds can be used more flexibly provided they are designed to upgrade the school's education program (and could include costs that typically would not be permitted under the Title II statute).

Consolidated schoolwide programs are **not required** to:

- Meet most statutory and regulatory requirements of the specific federal programs included in the consolidation as long as the intent and purposes of those programs are met;
- Distinguish among funds received from different sources when accounting for their use
- Maintain separate fiscal accounting records by federal program that identify the specific activities supported by those funds.

Examples of Flexibility in Action

To further highlight the potential of the schoolwide model, provided below are examples of how a schoolwide program school could *potentially* use Title I funds. While these following examples are specific, the concept remains the same. If a cost can be traced back to a school's schoolwide plan, Title I funds *may* be used to cover some or all of the cost.

1. **Compass:** A school conducts a teacher survey and identifies that teachers are not provided regular, meaningful feedback on their performance to foster continuous improvement. Compounding the problem further, evaluators are using hardcopy evaluations that are not always returned to teachers and are often misplaced. To address this problem, the schoolwide plan states that the, "school will make use of technology to provide teachers timely feedback on their Compass observations and annual evaluations." The school decides to purchase iPads for evaluators that contain an evaluation tool aligned with the Compass evaluation system which will be emailed to the teacher as soon as the observation/evaluation is complete. Providing teachers timely, meaningful feedback affects their performance and thus, the academic performance of their students. Because the school identified this as a need in their comprehensive needs assessment, the purchase of iPads would be consistent with the schoolwide plan, and therefore could be paid for using Title I funds.
2. **Common Core:** Another school is struggling with transitioning to the rigorous CCSS in 4th grade Math. It recognizes that current 4th grade math curriculum is aligned with former Grade Level Expectations and needs to be upgraded to support current CCSS. During the comprehensive needs assessment the school reviews 4th LEAP data and formative benchmark assessments that identified areas of weakness in skills formerly acquired in 6th grade. As a result, the school decides to upgrade the entire 4th grade math curriculum to address the gaps and shifts in content. In this case, the school may use Title I funds to cover costs associated with upgrading the Math curriculum.
3. **PARCC:** A school has completed the Technology Footprint readiness tool and results reveal that the Title I computer lab needs to be upgraded to ensure digital readiness in five areas: devise specification readiness, devise-to-test readiness, network and technical infrastructure readiness, staffing and training readiness, and facility readiness to accommodate newly mandated PARCC assessments. Some of the computers in the lab were

purchased with general funds. The school could use Title I funds to pay for upgrades for all computers in the Title I lab regardless of the original funding source.

4. **Professional Development:** A high school has administered a survey to teachers regarding the relevance of district-wide PD activities. The survey revealed that most PD is focused on ELA/Math or general instructional practices. The survey also indicated that teachers struggling with content shifts to more rigorous standards need additional college coursework to master subject matter. The school could use Title I and Title II funds to support teacher-driven professional development activities.

The schoolwide model provides a framework for schools to use when developing a student achievement plan that responds to the unique circumstances of each school. The Department's role is to make the planning process easier for meaning it provides greater flexibility around the use of funds in order to ensure students' needs are met.

For further information or technical assistance, please contact your IDEA or NCLB Point of Contact.