

Section Five

Program Design

- 5.1 Schoolwide Programs
- 5.2 Targeted Assistance

SCHOOLWIDE PROGRAMS

Timeline: When an LEA decides to serve a school under Title I, Part A. Should be re-evaluated regularly.

Other Resources: Profiles of Successful Schoolwide Programs

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Overview

LEAs may operate two types of Title I programs: schoolwide programs (SW), and targeted assistance programs. Each has specific advantages.

Section 1114 outlines how a local educational agency may consolidate and use Title I funds with other federal, state, and local funds in order to upgrade the entire educational program of a school where at least 40 percent of the children are from low-income families. The Title I funds must supplement the amount of funds that would in the absence of Title I funds be used to provide services that are required.

The decision to operate a schoolwide program versus a targeted assistance program should be made by the school with guidance from the district. No school participating in a schoolwide program shall be required to identify particular children as eligible to participate in a schoolwide program or to provide services to such children that are supplementary as required by targeted assistance programs (Section 1120A(b)).

Components of a Schoolwide Program

1. Comprehensive Needs Assessment
2. Schoolwide Reform Strategies
3. Instruction by Highly Qualified Teachers
4. High quality and ongoing professional development for teachers, principals, and paraprofessionals and other appropriate staff
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 in the transition from early childhood programs
8. Measures to include teachers in the decisions regarding the use of academic assessments
9. Activities to ensure that students who experience difficulty mastering the proficient or advanced levels of academic achievement standards shall be provided with effective, timely additional assistance
10. Coordination and integration of federal, state, and local services and programs

Any eligible school that desires to operate a schoolwide program must develop or amend an existing plan in consultation with the LEA and its school support team or other technical assistance provider. This comprehensive plan for reforming the total instructional program in the school should:

- Describe how the school will implement the components listed above;
- Describe how the school will use Title I resources and other sources to implement those components;
- Include a list of SEA and LEA programs and other Federal programs that will be consolidated in the SW program; and
- Describe how the school will provide individual assessment results in a language the parents can understand to the parents of a child who participates in the required assessments.

This plan must be developed during a one-year period unless the LEA determines that less time is needed or if the school was already operating a schoolwide at the time of the enactment of NCLB of 2001.

A school that is eligible for SW may use Title I funds to establish or enhance prekindergarten programs for children below the age of six, such as Even Start or early reading programs.

TARGETED ASSISTANCE SCHOOLS

Timeline: When an LEA decides to serve a school under Title I, Part A. Should be re-evaluated regularly.

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Overview

Section 1115 states that in eligible schools with a poverty level less than 40 percent or schools that choose not to operate a SW program, the LEA may use Title I funds to provide targeted services to eligible children identified as having the greatest need for special assistance.

Eligible children are those identified by the school as failing or most at risk of failing, to meet the State's challenging student academic achievement standards on the basis of multiple, educationally related, objective criteria established by the LEA.

The 2001 law expanded the categories of children who are automatically eligible for the Title I program to include students served in the previous two years under the Migrant Education Program. Also, *automatically* eligible is:

- Any child who participated in Head Start, Even Start, the Early Reading First program, or Title I preschool services at any time within the previous two years;
- Any child attending a community day program or living in a state or local institution for neglected or delinquent children; and
- Any child who is homeless and attending any school served by the LEA.

Students in Kindergarten through Grade 2 are to be selected solely on teacher judgment, parent interviews, and developmentally appropriate measures. Use of the selection criteria should result in a score or weight for each student, so that students may be ranked in order of their need. If resources do not allow for services for all eligible students, students should be selected in rank order.

Children to be included on the same basis as other children selected for services:

- Economically disadvantaged
- Students with disabilities
- Migrant children
- Limited English proficient children

Schools within a district may differ in the type of Title I services offered, including grade levels to be served, subject area, and curriculum.

Components of a Targeted Assistance School Program

1. Use the program's resources to help participating children meet the state's challenging standards expected for all children.
2. Ensure that planning for these students is incorporated into existing school planning.

3. Use effective methods and instructional strategies that are based on scientifically based research that strengthens the core academic program of the school.
4. Coordinate with and support the regular education program.
5. Provide instruction by highly qualified teachers.
6. Provide opportunities for professional development in accordance with the law for staff working with participating children.
7. Provide strategies to increase parental involvement.
8. Coordinate and integrate federal, state and local services and programs.

Title I paid staff may participate in general professional development and school planning activities and may assume limited duties that are assigned to similar personnel who are not Title I funded. The duty time must be the same proportion of total work time as for similar personnel at the same school.

The following table (excerpted from the Providing Title I Services in Schoolwide and Targeted Assistance Programs technical assistance paper) outlines the requirements and characteristics of each type of program. Following the table is the complete technical assistance paper (which also includes the table).

APPENDIX I: COMPARISON OF PROGRAM REQUIREMENTS¹

Provision	Schoolwide Program Requirements	Targeted Assistance Program Requirements
Eligibility	Schools with at least 40% poverty.	Any school in the LEA down to 35% poverty or the LEA poverty average, whichever is less. Schools conducting the year-long schoolwide planning process may also choose to operate a targeted assistance program.
Identification of Students	None	Schools must use multiple, educationally related, objective criteria to identify eligible students to receive Title I services.
Delivery of Supplemental Instructional Support Services	All students in a schoolwide program are eligible to receive services.	Only the most educationally needy students and those that participated at any time in the two preceding years in Head Start, Even Start, Early Reading First, migrant education, or those students that are neglected, delinquent, or homeless may receive services.
Plans	Schoolwide plans must include the required 10 components.	Targeted assistance plans must include the required 8 components.
Highly Qualified Teachers	All teachers must be highly qualified.	All teachers must be highly qualified.
Highly Qualified Paraprofessionals	All instructional paraprofessionals working in a schoolwide program must be highly qualified.	All instructional paraprofessionals who are paid with Title I funds must be highly qualified.
Parent Involvement	Parent involvement activities must be conducted for all parents. All parents must receive statutorily required notifications.	Parent involvement activities must be conducted for parents of participating students. All parents must receive statutorily required notifications.
Professional Development (in accordance with Section 1119)	All teachers in a schoolwide program may participate in Title I-funded professional development.	Priority for Title I funded professional development activities must be given to Title I funded teachers.
Services to Preschool Students	If a preschool program is part of a Title I schoolwide school, identification of children to receive services is not necessary. All teachers and paraprofessionals must meet the highly qualified requirements of PL 107-110, Section 9101(23).	Only the most educationally needy children may be selected to receive services in a preschool program Title I targeted assistance school. All teachers and those paraprofessionals funded with Title I must meet the highly qualified requirements of PL 107-110, Section 9101(23).
Control of Property	The LEA must maintain appropriate controls over equipment purchased with Title I funds.	The LEA must ensure that only Title I participating students use equipment purchased with Title I funds, unless use by ineligible students does not interfere with the Title I program and does not decrease the value of the equipment.

¹ Source: PL 107-110, Sections 1114 and 1115 and USDE Non-Regulatory Guidance

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**JEANINE
BLOMBERG**
*Commissioner of
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Technical Assistance Paper



Providing Title I Services in Schoolwide and Targeted Assistance Programs

Summary:

This guidance provides the requirements for Title I schoolwide and targeted assistance programs.

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INTRODUCTION

All Local Educational Agencies (LEAs) in Florida receive Title I funds to carry out supplemental instructional activities that ensure all children, and especially children attending schools with high poverty rates, have a fair and equal opportunity to obtain a high-quality education and reach Florida’s challenging academic achievement standards. Under the Title I statute [PL 107-110, Sections 1114 and 1115], LEAs may choose between two instructional delivery models to achieve this goal: schoolwide and targeted assistance programs. Schoolwide programs allow LEAs to upgrade the entire educational program of a Title I school, ensuring that all children have access to effective, research-based instructional strategies that will help them attain challenging academic content. Targeted assistance programs are designed to assist the most academically needy children selected within a school in reaching Florida’s academic content and achievement standards. LEAs notify the Florida Department of Education (FDOE) of the type of program model that will be implemented in each of its Title I schools in the annual project application.

This technical assistance paper provides guidance to LEAs on the requirements for schoolwide and targeted assistance programs, as required in PL 107-110, Sections 1114 and 1115 and the Code of Federal Regulations, Title 34, Chapter II, Part 200, Sections 200.25 through 200.29. Many of the questions and answers were taken from the US Department of Education’s (USDE) non-regulatory guidance, “Designing Schoolwide Programs” (<http://www.ed.gov/policy/elsec/guid/designingswpguid.doc>), and the archived policy guidance, “Targeted Assistance Schools” (http://www.ed.gov/legislation/ESEA/Title_I/target.html).

OVERVIEW

A-1. What are the main differences between targeted assistance and schoolwide programs?

A targeted assistance program provides services to a select group of children - those identified as failing, or most at risk of failing, to meet Florida's challenging content and student performance standards - rather than to all children, as in the schoolwide program. In addition, schools operating a targeted assistance program must maintain records that Title I, Part A funds are spent on supplemental activities and services for only those eligible students. In schoolwide programs, Title I, Part A funds may be used to upgrade the entire educational program by providing supplemental educational support services to all students, not just those identified as most at risk of failing to meet Florida’s achievement standards. Please see Appendix I for a comparison of the requirements for schoolwide and targeted assistance programs [PL 107-110, Sections 1114 and 1115].

A-2. How does an LEA determine which program model to implement?

When determining which program model to implement, an LEA must first consider the percent of students ages 5-17 in poverty. If an LEA provides Title I, Part A funds to schools with poverty rates of less than 40%, then those schools must operate as targeted assistance programs [PL 107-110, Section 1115(a)]. However, any school, regardless of poverty level, can operate as a targeted assistance model. In addition, if an LEA elects to fund a new Title I school, it may choose to open the school as a targeted assistance program while undertaking the comprehensive planning process necessary to implement a schoolwide program. Only schools with poverty rates of 40% or higher are eligible to operate a schoolwide program. Schoolwide programs provide greater flexibility, as they are designed to upgrade the entire educational program to assist all children in meeting Florida's academic content and achievement standards [PL 107-110, Section 1114(a)].

A-3. Who decides whether a school should operate as a targeted assistance or schoolwide program?

The school may make the decision about whether to implement a targeted assistance or schoolwide program based on discussion with the LEA, staff, and parents. However, each LEA should provide technical assistance to Title I-eligible schools regarding their program model options [USDE non-regulatory guidance].

A-4. What requirements must a school meet to be eligible to operate a schoolwide program?

A Title I school may operate as a schoolwide program only if at least 40% of the students in the school, or residing in the attendance area served by the school, are from low-income families. In addition, schools wishing to operate a schoolwide program must conduct a year of comprehensive planning (see sections C and D), unless the LEA determines that less time is needed [PL 107-110, Section 1114(a)(1) and (b)(2)(B)].

A-5. May an LEA allocate a greater per-pupil amount to schoolwide program schools than to targeted assistance schools since schoolwide programs serve all children in the school?

No. The Title I statute requires allocations to be based on the total number of low-income children in a school attendance area or school. Therefore, poverty is the only factor on which an LEA may determine funding. In other words, an LEA may not allocate funds based on the instructional model, educational need, or any other non-poverty factor [PL 107-110, Section 1113(a)(5)].

TITLE I SCHOOLWIDE PROGRAMS

B-1. What are the advantages of operating as a Title I schoolwide program?

A schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school. Its primary goal is to ensure that all students, particularly those who are low achieving, demonstrate proficient and advanced levels of achievement on Florida's state academic standards.

The emphasis in schoolwide program schools is on serving all students, improving all structures that support student learning, and combining all resources, as allowed, to achieve a common goal. Schoolwide programs maximize the impact of Title I and provide greater flexibility by allowing supplemental instruction to all students in the school [PL 107-110, Section 1114(b)(1)].

B-2. How does a school develop a schoolwide program?

The development of a schoolwide program requires a year long planning process, unless the LEA determines that less time is required [PL 107-110, Section 1114(b)(2)(B)]. The planning process includes:

- Conducting a comprehensive needs assessment;
- Identifying and committing to specific goals and strategies that address those needs;
- Creating a comprehensive plan; and
- Conducting an annual review of the effectiveness of the schoolwide program and revising the plan as necessary.

B-3. Who should be involved in the development of the schoolwide program?

Typically, the principal or another instructional leader establishes the planning team, which should consist of school and LEA administrators, teachers and other professional staff in the school such as guidance counselors and curriculum specialists, parents and other community members, students (in a secondary school), and if appropriate, other federal program administrators [34 CFR, Section 200.27]. The team should be knowledgeable about Title I, Part A programs and their regulatory requirements. An existing team or committee, such as the school advisory council, may comprise this planning team; however, the school should ensure that all representatives required by the statute participate. Please see Appendix II (page 18) for a suggested list of team members and their roles.

After the team has been established, it should begin to collect the data that comprise the comprehensive needs assessment. The needs assessment forms the basis for the schoolwide plan [USDE non-regulatory guidance].

COMPREHENSIVE NEEDS ASSESSMENT

C-1. What is a comprehensive needs assessment?

A comprehensive needs assessment is a data analysis tool that assists schools in prioritizing program services. The needs assessment guides the development of the comprehensive schoolwide plan and its evaluation, and is closely linked to all aspects of schoolwide program implementation. The needs assessment is based on academic information about all students in the school, including economically disadvantaged students, students from major racial and ethnic groups, students with disabilities (SWDs), English language learners (ELLs), and migrant students.

The comprehensive needs assessment helps schools understand the subjects and skills for which teaching and learning need to be improved. In addition, it assists schools in identifying the specific academic needs of students and groups of students who are not yet achieving Florida's academic proficiency standards [34 CFR, Section 200.26(a)].

C-2. Who provides technical assistance to schools in developing the needs assessment and understanding the data?

The LEA should provide technical assistance to schools in developing and interpreting the data used for the needs assessment [PL 107-110, Section 1112(c)(1)(B) and (c)(1)(C)].

C-3. What data should be analyzed when conducting the comprehensive needs assessment?

The school, in conjunction with the LEA, should analyze data from a variety of sources, including, but not limited to:

- Student and staff demographic data;
- Achievement data from multiple assessments and over multiple administrations;
- The quantity and quality of instructional activities, materials, and technology;
- Professional development evaluations;
- The extent of family and community involvement; and
- School climate indicators such as those reported through the School Environmental Safety Incident Reporting system [34 CFR, Section 200.26(a)].

Please see Appendices III –V (pages 19-26) for sample needs assessment indicators.

C-4. Is the needs assessment that is included in the school improvement plan sufficient for meeting the comprehensive needs assessment requirement?

No. In general, the needs assessment that is included in the school improvement plan is not sufficient for meeting the comprehensive needs assessment requirement, as it does not provide a comprehensive picture of the school. Some of the components included in the school improvement plan may be used in the comprehensive needs assessment, but additional data should be gathered. LEAs and schools may already have conducted similar needs assessments that provide sources of data, such as school climate surveys, parent involvement evaluation results, the LEA educational technology plan, the school public accountability reports, and the LEA in-service plans.

C-5. Once the school has gathered all the data for the comprehensive needs assessment, what should be done next?

Once the data have been gathered, the planning team should determine how the school is currently performing based on the results of the data analysis and its vision of where it wants to be. Data obtained from the needs assessment provide the foundation for the goals of the comprehensive schoolwide plan and help identify the needs of the school [USDE non-regulatory guidance].

C-6. Should a school try to address all the identified needs in the initial schoolwide plan?

No. Schools should prioritize the major issues that have been identified and address no more than three of the most important in the first year. Once priority needs have been identified, the planning team should describe them in detail and generate discussion among staff members and other stakeholders about strategies to address them. Strategies must be aligned with the Sunshine State Standards, based on scientific research, comprehensive, and span all grades and subjects [USDE non-regulatory guidance].

DEVELOPING THE SCHOOLWIDE PLAN

D-1. What are the general requirements for the schoolwide plan?

The schoolwide plan should be a comprehensive plan for reforming the entire educational program of the school. The plan must:

- Include all ten components listed in question D-2;
- Describe how the school will use its fiscal resources to implement those components;
- Include a list of other federal, state, and local programs that will be implemented in the school; and
- Describe how the school will provide individual academic assessment results, including the interpretation of those results, to parents in a language parents can understand [PL 107-110, Section 1114(b)(2)].

D-2. What are the required components of a comprehensive schoolwide plan?

PL 107-110, Section 1114(b)(1) identifies the following ten components of a schoolwide plan:

1. A comprehensive needs assessment of the entire school;
2. Schoolwide reform strategies that:
 - a. provide opportunities for all children to meet Florida's proficient and advanced levels of student achievement described in Section 1111(b)(1)(D);
 - b. use effective methods and instructional strategies that are based on scientifically based research that:
 - i. strengthen the core academic program in the school;
 - ii. increase the quality and amount of learning time, such as providing an extended school year, before and after school, summer programs opportunities, and help provide an enriched, accelerated curriculum; and
 - iii. include strategies for meeting the educational needs of historically underserved populations.
3. Instruction by highly qualified teachers, as defined in PL 107-110, Section 9101(23);

4. High quality, ongoing professional development for teachers, principals, and paraprofessionals and, if appropriate, pupil services personnel, parents, and other staff to enable all children in the school to meet Florida's student academic achievement standards;
5. Strategies to attract high quality, highly qualified teachers to high need schools;
6. Strategies to increase parental involvement in accordance with Section 1118, such as family literacy services;
7. Plans for assisting preschool children in the transition from early childhood programs, such as Head Start, Even Start, Early Reading First, or voluntary prekindergarten, to local elementary school programs;
8. Measures to include teachers in the decisions regarding the use of academic assessments described in Section 1111(b)(3) in order to provide information on, and to improve, the achievement of individual students and the overall instructional program;
9. Activities that ensure that students who experience difficulty mastering the proficient or advanced achievement levels required by Section 1111(b)(I) are provided with effective, timely, additional assistance; and
10. Coordination and integration of federal, state, and local services and programs, such as violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

D-3. When should the comprehensive plan be written?

The development of the schoolwide plan begins once the planning team has completed a needs assessment, analyzed results, identified priorities, created program goals, and selected strategies for carrying out those goals. Planning is generally a year long process, unless the LEA determines that less time is needed [PL 107-110, Section 1114(b)(2)(B)].

D-4. Can the school improvement plan serve as the comprehensive schoolwide plan?

Yes, a completed Florida Department of Education school improvement plan template may serve as the schoolwide plan, as long as the school supplements the needs assessment provided in the plan, as described in question C-4, and provides an addendum to address coordination and integration of federal, state, and local services and programs. The school improvement plans are located on the Bureau of School Improvement's website at <http://www.bsi.fsu.edu>, but should also be locally maintained by the school and LEA.

D-5. Must every school spend an entire year planning before implementing a schoolwide program?

No. According to PL 107-110, Section 1114(b)(2)(B), every school that wishes to operate a schoolwide program is required to spend an entire year conducting the planning process. However, an exception to this general rule can be made if the LEA determines, after considering the recommendation of technical assistance providers, that the school needs less time to develop and implement its schoolwide program. In addition, a new school may consider the year prior to opening as the planning year, if it has indeed participated in a comprehensive planning process.

D-6. Are parents involved in the development and review of the schoolwide plan?

Yes. Parents as well as members of the community must be involved in the development of the schoolwide plan. In addition, the plan must be made available to all parents and the

public in an understandable and uniform format, and to the extent practicable, in a language that parents can understand [PL 107-110, Section 1114(b)(2)(B)(ii) and (iv)].

D-7. Should planning be a continuous activity even after the initial planning year?

Yes. Although the comprehensive needs assessment as described in this section is required only during the planning year preceding the implementation of the schoolwide program, effective programs incorporate planning into a continuous cycle of improvement. Schools should regularly monitor and adjust their plans using updated school profile information, a reassessment of needs, and the results of the required annual evaluation [34 CFR, Section 200.26]. One model to consider is the Florida's Continuous Improvement Model (FCIM). Training on FCIM is available through the Bureau of School Improvement.

IMPLEMENTATION

E-1. Who will monitor the implementation of the schoolwide plan?

The LEA approves and monitors the implementation of each schoolwide program plan [PL 107-110, Section 1112(c)(1)(C)]. At the school level, a school team consisting of the principal, teachers, parents, external technical assistance providers, and other representatives from the school and community may be established to monitor implementation. However, it is the responsibility of the LEA to continuously monitor and assess whether the schoolwide program strategies are effective in improving student achievement and whether the plan should be revised.

E-2. How long does the schoolwide plan remain in effect?

Once written, the schoolwide plan remains in effect as long as the school chooses to be a schoolwide program. However, the original schoolwide plan should be revised over time as changes occur inside and outside of the school. A school should review and revise its plan as necessary, evaluating it at least annually. These activities are likely to result in modifications that address changing student needs or new instructional approaches [PL 107-110, Section 1114(b)(2)(B)(iii) and 34 CFR, Section 200.26(c)].

E-3. Can “non-Title” funds be utilized in the implementation of the schoolwide plan?

Yes. The schoolwide plan must contain a budget that identifies all of the resources that will be available to implement the schoolwide program. In the spirit of Title I schoolwide programs, the budget should reflect a commitment to using all available resources, as allowed, to improve the achievement of all students [34 CFR, Section 200.25].

E-4. Can Title I, Part A funds be used to establish or enhance prekindergarten programs?

Yes. A school operating a schoolwide or targeted assistance program may use Title I, Part A funds to enhance prekindergarten programs for children below the age of 6, such as Even Start, Early Reading First, or voluntary prekindergarten programs [PL 107-110, Section 1114(c)]. Teachers and paraprofessionals working in a Title I prekindergarten program must meet the highly qualified requirements of Section 1119.

EVALUATION

F-1. What is the purpose of an annual evaluation?

The purpose of the annual evaluation of the schoolwide program is to ensure that the program described in the schoolwide plan is implemented as designed and that its implementation has a positive effect on student achievement. Thus, unsatisfactory results of the annual review should not be perceived as a sign that the school should develop a new plan. Instead, the school should revise its existing plan and redirect its efforts in order to implement a schoolwide program that helps all students achieve at high levels [34 CFR, Section 200.26(c)].

F-2. What are the steps in the annual evaluation?

LEAs may consider the following six components to guide the evaluation process, as provided in the US Department of Education's non-regulatory guidance pertaining to schoolwide programs:

1. Identify the purpose and intended audiences. The purpose may include a determination of the percentage of students who reach proficiency on Florida's annual assessments. The intended audience for the annual review should include all stakeholders, both internal and external to the school.
2. Outline the program review process. Program review begins at the same time that the schoolwide program is being designed through the comprehensive needs assessment.
3. Identify the data collection instruments. Reviewers will determine how data that answer each question will be collected. Examples of data collection instruments include document reviews, tallies, questionnaires, interviews, surveys, observations, assessments, attitude inventories, and focus groups.
4. Collect the data. Data collectors should be carefully trained, and there should be consistency in instructions and data collection procedures so that results are reliable across surveys.
5. Analyze and interpret the results. The information that emerges from the data analysis should clearly describe the progress the school has made implementing its program and increasing the student achievement and indicate areas where the revision or additional work is needed.
6. Report. The report should be clearly and concisely written and available to all stakeholders. The report typically includes background information, the evaluation question(s), an explanation of how the data were analyzed, findings, and a conclusion with recommendations.

F-3. Who should conduct the evaluation/annual review?

The school, with the assistance of the LEA, should decide whether the review will be conducted internally (by the school staff) or externally (by a person or persons outside of the school, such as staff from the LEA, a regional educational laboratory, an institution of higher learning, or any other technical assistance provider). This decision should be made collaboratively between schools and LEAs. The availability of resources and staff, outcomes of prior reviews, and the experience of the school with implementing schoolwide programs are all factors that should be taken into account. LEAs and schools are strongly encouraged to use outside reviewers whenever possible.

If resources do not permit the use of outside reviewers on an annual basis, LEAs and schools might consider using an outside reviewer every few years [USDE non-regulatory guidance].

F-4. Why must schoolwide program schools conduct an additional review after they have been evaluated for Adequate Yearly Progress (AYP)?

Results from state assessments indicate whether the school has made AYP and if they are successful in moving all students to the proficient or advanced levels of achievement in reading/language arts and math. The annual review of the schoolwide program should go beyond this measure to examine all aspects and goals of the schoolwide plan. The annual review is designed to reveal areas of strength within the program and areas that need revision in order to better position the school to continue improving and to make AYP [USDE non-regulatory guidance].

F-5. What if the annual review indicates that a particular strategy is not being fully implemented or not having the intended impact on student achievement?

If data show that a particular strategy is not being fully implemented or not having the intended impact on student achievement, it is an indication that changes are needed. In such cases, the school should identify and address the issues that prevented the strategy from being fully implemented, and revise its existing plan to address the needs, as appropriate [USDE non-regulatory guidance].

F-6. Once the annual evaluation is completed, what is the next step?

First, the findings should be widely disseminated to school staff, parents, and the community and input requested. LEAs may disseminate this information through newsletters, mail-outs, school websites, or public notices. Once this has occurred, the schoolwide planning team identifies which recommendations will be incorporated into the existing school plan. The school should [USDE non-regulatory guidance]:

1. Review the strategies and action steps originally proposed in the schoolwide plan;
2. Use the findings and recommendations to identify the parts of the schoolwide plan that have been implemented ineffectively or not at all;
3. Solicit the input of all stakeholders in identifying more effective strategies to achieve identified goals;
4. Identify any additional training that is needed to improve implementation;
5. Determine if additional resources are needed to implement the revised improvement plan and how they will be obtained;
6. Re-establish responsibilities and timelines for implementing the revised plan;
7. Communicate to all stakeholders what has been incorporated into the revised plan; and
8. Review how the plan was implemented and make changes as appropriate to reflect modifications to the plan.

TARGETED ASSISTANCE PROGRAMS

G-1. What are the essential components of targeted assistance programs?

According to PL 107-110, Section 1115(c)(1), targeted assistance programs must incorporate the following eight components:

1. Use program resources to help participating children meet Florida's academic achievement standards;
2. Ensure that planning for participating students is incorporated into existing school planning;
3. Use effective methods and instructional strategies based on scientific research that strengthen the core academic program and:
 - i. Give primary consideration to providing extended learning time such as an extended school year, before and after school, and summer programs and opportunities;
 - ii. Help provide an accelerated, high-quality curriculum; and
 - iii. Minimize removing children from the regular classroom during regular school hours for Title I instruction.
4. Coordinate with and support the regular education program, which may include--
 - i. Counseling, mentoring, and other pupil services;
 - ii. College and career awareness and preparation;
 - iii. Services to prepare students for the transition from school to work; and
 - iv. Services to assist preschool children's transition to elementary school from early childhood programs such as Head Start, Even Start, Early Reading First, or voluntary prekindergarten programs.
5. Provide instruction by highly qualified teachers;
6. Provide professional development opportunities with Title I and other resources, to the extent feasible, for administrators, teachers, paraprofessionals, and if appropriate, with parents and other school staff who work with participating children;
7. Provide strategies to increase parental involvement, such as family literacy services; and
8. Coordinate and integrate federal, state, and local services and programs, including programs supported under the Title I Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

G-2. Which students are eligible to receive Title I, Part A services in a targeted assistance program?

Eligible children are those under age 21 who are entitled to a free public education in grades 1 through twelve and those children who are not yet at a grade level for which the LEA provides a free public education.

In addition, certain students are automatically eligible for Title I, Part A services. These students include:

- Those who participated in a Head Start or Even Start program at any time in the two preceding years;
- Those who received services under a program for migrant children and youth at any time in the two preceding years;
- Those who are in a local institution for neglected or delinquent children or attending a community day program; and
- Homeless children attending any school in the LEA [PL 107-110, Section 1115(b)].

G-3. How does a school identify which students receive services?

From the universe of eligible children in a targeted assistance school, the school selects those children who have been identified as failing, or most at risk of failing, Florida's academic achievement standards. Student selection within the school must be based on multiple, educationally related, objective criteria established by the LEA and supplemented by the school. Students in grades 3-12 may be selected based on Florida Comprehensive Assessment Test (FCAT) or approved alternate assessment results together with other objective criteria. Students from preschool through grade 2 must be selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures that determine which children are failing, or most at risk of failing, to meet the Sunshine State Standards and student performance standards. School staff, in consultation with the LEA, must use their best professional judgment in making these choices [PL 107-110, Section 1115(b)(1)(B)].

G-4. May an LEA or school use Title I, Part A funds to identify at-risk students?

No. It is the responsibility of the LEA and school to identify at-risk students using state or local resources. Once students are identified for services, Title I, Part A funds may be used to select those students who are most in need or to ascertain specific educational needs of eligible students [USDE non-regulatory guidance].

G-5. Are English language learners (ELL) and students with disabilities (SWD) to be served in a targeted assistance program?

SWDs and ELLs are eligible for Title I, Part A services on the same basis as other children who are selected for services. However, they are also entitled to services required by law because of their disability or their limited proficiency in English. To avoid supplanting, a targeted assistance school may not use Title I, Part A funds to provide the level of services necessary to meet federal, state, or local requirements for ELLs or SWDs. Title I, Part A funds may be used, however, to coordinate and supplement these services as well as to provide additional direct services to these students [USDE non-regulatory guidance].

G-6. Are migrant children eligible to be served in targeted assistance programs?

Yes. Migrant children are eligible for Title I, Part A services on the same basis as other children who are selected to receive services. Because LEAs that currently receive migratory children normally do so on a regular basis, LEAs should plan for their arrival and consider their needs when planning, or helping schools to plan, Title I, Part A services [PL 107-110, Section 1115(b)(2)].

G-7. May a school provide services to particular children for less than a full school year?

Yes. Because student needs may change throughout the year, students may enter and/or exit the program during the school year. Written procedures should be established that identify how students may exit the program. Records that indicate entry and exit dates and criteria should also be carefully maintained at the school [USDE non-regulatory guidance].

G-8. May non-Title I students participate in the targeted assistance program?

Yes. Because of the instructional method, setting, or time of a particular Title I, Part A service, it is not always reasonable or desirable for a school to serve only children who have been selected to participate in a Title I program. This may be particularly true if a school is providing Title I services in the regular classroom. A school may provide, on an incidental basis, Title I services to children who have not been selected to participate in the Title I program. According to USDE non-regulatory guidance, this would be allowable only if the Title I program:

- Is designed to meet the special educational needs of the children who are failing, or most at risk of failing, to meet Florida's challenging student performance standards and is focused on those children; and
- The inclusion of non-Title I, Part A children does not:
 - Decrease the amount, duration, or quality of Title I services for Title I children;
 - Increase the cost of providing the services; or
 - Result in the exclusion of children who would otherwise receive Title I services.

G-9. What instructional strategies and models are appropriate for targeted assistance programs?

Instructional strategies and models in a targeted assistance school must focus on enabling participating students to meet Florida's academic achievement standards. The selection of instructional models to use in a targeted assistance school should be made by each school based on the needs of participating students. Although extended-time strategies are strongly encouraged by the US Department of Education, other strategies such as in-class models and collaborative teaching among Title I and regular classroom teachers can also benefit participating children [USDE non-regulatory guidance].

G-10. May an LEA use a pull-out model for providing instructional support services?

Yes. However, the use of pull-out programs to provide instructional support services is strongly discouraged. Title I, Part A requires that targeted assistance programs use effective teaching strategies that give primary consideration to extended learning time and an accelerated, high-quality curriculum.

Because there are situations in which a school is unable to provide extended-time services, pull-out models are allowable strategies, with certain considerations.

Students pulled out from regular instruction must be provided support services in the same subject from which they were pulled. For example, if a student has been identified as needing additional support in mathematics, that student should be provided the support through the pull-out model only during the regularly scheduled mathematics class. In addition, if a paraprofessional provides support services, they must be under the direct supervision of the teacher [PL 107-110, Section 1115(c)(1)(C)].

G-11. How often should the LEA and schools review the progress of participating children?

The LEA and schools must review, on an ongoing basis, the progress of participating children and should revise, as necessary, the services provided [PL 107-110, Section 1115(c)(2)(B)]. This may be accomplished through the LEA's progress monitoring schedule.

G-12. May services such as health, nutrition, and other social services be provided to students in a targeted assistance program?

Yes. Title I, Part A funds may be used to provide:

- Basic medical equipment, such as eyeglasses and hearing aids;
- Compensation of a coordinator; and/or
- Professional development necessary to assist teachers, pupil services personnel, other staff, and parents in identifying and meeting the comprehensive needs of eligible children.

Such comprehensive services, according to PL 107-110, Section 1115(e), may be provided if:

1. Health, nutrition, and other social services are not otherwise available to participating children in a targeted assistance school;
2. The school, if appropriate, has conducted a comprehensive needs assessment;
3. The school has established a collaborative partnership with local service providers; and
4. Funds are not reasonably available from other public or private sources.

G-13. Must parent compacts be implemented in schools with targeted assistance programs?

Yes. Parent-school compacts are written agreements between the school and the parents of children participating in Title I, Part A programs that identify the activities that the parents, the entire school staff, and the students will undertake to share the responsibility for improved student academic achievement. Compacts must be completed annually for each student receiving Title I services, following the requirements of PL 107-110, Section 1118(d).

G-14. Must all paraprofessionals in a targeted assistance school meet the “highly qualified” requirements?

Only those paraprofessionals paid with Title I, Part A funds in a targeted assistance program, including targeted assistance prekindergarten programs, must meet the highly qualified requirements.

Paraprofessionals are considered highly qualified if they have completed at least two years of study at an institution of higher education, obtained an associates degree or higher, or passed a formal assessment that measures their knowledge of, and ability to assist in, instruction. Paraprofessionals who are not paid with Title I, Part A funds do not have to meet the requirements [PL 107-110, Section 1119(c)-(g)].

G-15. May Title I, Part A funds be used to assist non-highly qualified teachers of core academic subjects in targeted assisted schools who do not work in the Title I program?

Yes. According to a US Department of Education policy letter dated January 15, 2003, Title I, Part A funds may be used to help teachers of core academic subjects who teach in schools with targeted assistance programs but are not funded with Title I, Part A, become highly qualified as provided in PL 107-110, Section 9101(23), if the following conditions have been met:

- All Title I funded teachers in the targeted assistance programs are “highly qualified” or given first priority in obtaining professional development services paid for with Title I funds;
- The funds are used only to help teachers of core subject academic subjects in the school with a targeted assistance program become highly qualified; and
- The funds will not be used to help teachers of core academic subjects in non-Title I schools.

G-16. How may the Title I and regular school staff work together?

To promote the coordination and integration of Title I staff and participants into the regular school program, overall school planning, and improvement efforts, Title I paid personnel may participate in general professional development and school planning activities [PL 107-110, Section 1115(d)]. Title I paid personnel may also collaboratively teach with regular classroom teachers if such teaching directly benefits participating children. In addition, Title I teachers may work closely with regular education teachers, special education teachers, or teachers of English language learners (ELL), if appropriate, to ensure that each eligible student’s educational needs are addressed [USDE non-regulatory guidance].

G-17. How is this coordination and integration documented?

Coordination may be documented through meeting notes, lesson plans, student records, and/or schedules [USDE non-regulatory guidance].

G-18. May Title I materials and equipment be used by non-Title I teachers and students?

According to USDE non-regulatory guidance, materials and equipment purchased with Title I, Part A funds are to be used with Title I children.

Title I equipment may not be purchased or used for the general benefit of all children in a class, unless a user fee is paid to Title I. However, under very specific guidelines, Title I equipment may be used for non-Title I activities on a part-time basis without the user fee if the following conditions are met:

- The equipment is part of a Title I project that has been properly designed for eligible children with the greatest risk;
- The equipment is reasonable and necessary to operate the Title I project, without regard to any use in non-Title I activities;
- The project was designed to make maximum appropriate use of equipment for Title I purposes;
- The use of the equipment in non-Title I activities does not decrease the quality or effectiveness of the Title I services provided to Title I children with the equipment;
- The use of the equipment does not increase the cost or shorten the useful life of the equipment;
- The use of the equipment does not result in the exclusion of Title I children who would otherwise have been able to use the equipment; and
- The non-Title I use does not exceed 10% of the time the equipment is used in Title I activities unless a user fee has been paid and prior approval has been granted.

G-19. May Title I funds be used in a targeted assistance program to pay for Title I students' participation in an extended-day kindergarten program?

Yes. If the Title I program is designed to extend the time that a Title I eligible student is in kindergarten, Title I, Part A funds may be used. For example, the district provides morning instruction through state and local funds to all students, including Title I students. Students identified as in need of academic support are then served in the afternoon through Title I funds by an appropriately licensed teacher [USDE non-regulatory guidance].

G-20. What children are eligible for participation in a Title I-supported preschool program in a Title I targeted assistance school?

To be eligible to attend a Title I preschool program in a targeted assistance school, preschool-age children, like school age children, must be failing or most at risk of failing to meet Florida's challenging student academic achievement standards as determined by multiple, educationally related, objective criteria. For preschool children, this determination should be made on the basis of criteria such as teacher judgment, interviews with parents, and developmentally appropriate measures of child development. In addition, children who participated in a Head Start, Even Start, Early Reading First, or Title I preschool program at any time during the two preceding years, homeless children, and children in institutions for neglected or delinquent children are automatically eligible for Title I preschool and to continue into Title I school programs (PL 107-110, Section 1115(b)(2)(B)).

G-21. What responsibilities do targeted assistance programs have with respect to assisting preschool children in the transition from preschool to local elementary school?

Targeted assistance programs must coordinate with and support the school's regular education program, which may include services to assist preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or voluntary prekindergarten programs to elementary school programs (PL 107-110, Section 1115(c)(1)(D)).

APPENDIX I: COMPARISON OF PROGRAM REQUIREMENTS¹

Provision	Schoolwide Program Requirements	Targeted Assistance Program Requirements
Eligibility	Schools with at least 40% poverty.	Any school in the LEA down to 35% poverty or the LEA poverty average, whichever is less. Schools conducting the year-long schoolwide planning process may also choose to operate a targeted assistance program.
Identification of Students	None	Schools must use multiple, educationally related, objective criteria to identify eligible students to receive Title I services.
Delivery of Supplemental Instructional Support Services	All students in a schoolwide program are eligible to receive services.	Only the most educationally needy students and those that participated at any time in the two preceding years in Head Start, Even Start, Early Reading First, migrant education, or those students that are neglected, delinquent, or homeless may receive services.
Plans	Schoolwide plans must include the required 10 components.	Targeted assistance plans must include the required 8 components.
Highly Qualified Teachers	All teachers must be highly qualified.	All teachers must be highly qualified.
Highly Qualified Paraprofessionals	All instructional paraprofessionals working in a schoolwide program must be highly qualified.	All instructional paraprofessionals who are paid with Title I funds must be highly qualified.
Parent Involvement	Parent involvement activities must be conducted for all parents. All parents must receive statutorily required notifications.	Parent involvement activities must be conducted for parents of participating students. All parents must receive statutorily required notifications.
Professional Development (in accordance with Section 1119)	All teachers in a schoolwide program may participate in Title I-funded professional development.	Priority for Title I funded professional development activities must be given to Title I funded teachers.
Services to Preschool Students	If a preschool program is part of a Title I schoolwide school, identification of children to receive services is not necessary. All teachers and paraprofessionals must meet the highly qualified requirements of PL 107-110, Section 9101(23).	Only the most educationally needy children may be selected to receive services in a preschool program Title I targeted assistance school. All teachers and those paraprofessionals funded with Title I must meet the highly qualified requirements of PL 107-110, Section 9101(23).
Control of Property	The LEA must maintain appropriate controls over equipment purchased with Title I funds.	The LEA must ensure that only Title I participating students use equipment purchased with Title I funds, unless use by ineligible students does not interfere with the Title I program and does not decrease the value of the equipment.

¹ Source: PL 107-110, Sections 1114 and 1115 and USDE Non-Regulatory Guidance

APPENDIX II: SAMPLE SCHOOLWIDE PLANNING TEAM MEMBERS/ROLES²

Chair – Coordinates all aspects of the school’s planning; serves as a liaison with the committee, the principal (in cases where the chair is not the principal), the central office, and the school. The chair is often responsible for serving as a liaison with the school support team, identifying subcommittee chairs, and delegating responsibilities.

Assistant Chair – Supports the chair by guiding logistics and the committee’s planning activities. The assistant chair may be selected for a special skill, such as knowledge of federal programs, experience as a negotiator or an evaluator, or an experienced curriculum developer.

Data Coordinator – Identifies data collection instruments, designs new instruments, and/or modifies existing instruments, prepares data for analysis, leads the analysis and interpretation process.

Facilitator – Serves to help identify resources for planning and research-based instructional practices. This person may be a school insider, or an outside consultant, from the community, the district office, or nearby university.

Teacher Representatives – Staff representatives from grade teams and specialists in the school who are informed about meeting the educational needs of all students, especially those with special needs, grade and content specific curriculum, or regulations funded programs must follow.

Special Education Liaison – One of the special education teachers who can help coordinate regular and special education activities with regular program instruction to develop a full inclusion program that benefits all identified students with disabilities.

Paraprofessional Liaison – Selected from the pool of paraprofessionals who inform the planning committee, this individual is informed about paraprofessional roles, needs, skills, interests and suggestions.

Staff Development Representative – This staff member serves as liaison with colleagues to identify staff needs and helps plan the professional development program for teachers, paraprofessionals, parents and other staff.

Representatives of Programs from which Funds Have Been Consolidated – These representatives will assist in addressing how the schoolwide program will meet the intent and purposes of those programs.

Parent Representative(s) – This representative should be a member of a larger school parent association in order to report the activities of the schoolwide planning team to parents as a stakeholder group. This individual should also be an active participant and contribute to the work of the group.

² Source: US Department of Education’s *Designing Schoolwide Programs Non-Regulatory Guidance*

APPENDIX III: SAMPLE ASSESSMENT OF SCHOOL PROGRESS TOWARD SCHOOLWIDE IMPROVEMENT FOR USE IN THE NEEDS ASSESSMENT AND EVALUATION³

Schools might consider using a scale such as this to assess progress in implementing schoolwide improvement: Sustaining Ongoing Improvement-5; Continuing Progress-4; Evolving First Steps 3; Thinking About Change-2; Maintaining the Status Quo-1. Data may be used prior to implementing the schoolwide planning process, during implementation, and at the end of the year as part of the evaluation of program success.

Individual Rating ____

Consensus Rating ____

	Baseline Date	Benchmark Date	Benchmark Date
Standards-Based Curriculum The school's curriculum is aligned with state standards and is articulated across grades and subjects.	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation
Standards-Based Instruction Teachers use content and achievement standards and assessment information to identify curricular priorities and instructional materials and to design relevant and challenging learning experiences for all students, including those of diverse cultural backgrounds, and academic experiences.	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation
Standards-Based Assessment The school uses multiple classroom and district assessments, in addition to the FCAT, to monitor the achievement of individual students (including English language learners, and students with special needs). Achievement data are disaggregated and reported by all major subgroups.	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation

³ Source: US Department of Education's *Designing Schoolwide Programs Non-Regulatory Guidance*

	Baseline Date	Benchmark Date	Benchmark Date
<p>Data-Based Accountability and Evaluation The school has a fully implemented accountability system that includes a school improvement plan based on disaggregated achievement and other data.</p>	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation
<p>Structural Reform Strategies The school structures its schedule, organization, support mechanisms, and resources to provide all students equal access to resources and the support to achieve to high standards.</p>	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation
<p>Leadership and Governance The school improvement team, or other governance structure includes teachers, other non-instructional staff, parents, community members and students in a shared leadership structure to support and improve school programs.</p>	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation
<p>Professional Development The school has a structure and process for developing and implementing a professional development plan that is aligned with the schoolwide program goals; the plan is research based, and helps staff to better meet the needs of students.</p>	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation
<p>Culture and Climate The school's philosophy, norms, values, beliefs and shared vision reflect expectations for high achievement for all students, collaboration and collegiality among all staff, and mutual respect and trust among all individuals; the school is safe and orderly and is welcoming to students and their families.</p>	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation

	Baseline Date	Benchmark Date	Benchmark Date
<p>External Support and Resources The school accesses external support and resources from a variety of sources to implement, supplement and/or extend goals. Use of external resources is based on thorough research of their effectiveness and alignment with the schoolwide program plan.</p>	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation
<p>Parent and Community Involvement The school has active partnerships with parents and linkages to community organizations and institutions; the community is actively engaged and supports the activities of the school.</p>	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation
<p>Extended Learning Activities The school provides informal learning experiences and extracurricular activities, such as sports, music, art and clubs that appeal to diverse populations; these offerings are provided directly or through community partnerships.</p>	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation	<input type="checkbox"/> 5 <input type="checkbox"/> 4 <input type="checkbox"/> 3 <input type="checkbox"/> 2 <input type="checkbox"/> 1 Supporting Documentation

APPENDIX IV: SAMPLE INDICATORS FOR THE SCHOOL PROFILE FOR USE IN THE NEEDS ASSESSMENT⁴

This table contains possible indicators that can be used to complete the school profile as part of the needs assessment process. This tool may also be used to develop the schoolwide plan. Many of these data elements can be found in Florida's Automated Student Database, in the School and District Public Accountability Reports, in School Environment and Safety Incidence Reports, and locally generated reports from finance, human resources, and student information systems.

Student Demographics	Possible Indicators
<input type="checkbox"/> Enrollment	The number of students in the school; students in special programs (Title I, special education, gifted and talented), by ethnicity or other meaningful categories.
<input type="checkbox"/> Daily Attendance	Number of students attending school by grade, grade span, whole school, or other enrollment category. The percent of students tardy for classes.
<input type="checkbox"/> Mobility/Stability	The mobility rate is the percentage of children who move in and out of a school during a year. The stability rate refers to the percent of students who remain in the same building for the entire year.
<input type="checkbox"/> Socioeconomic Status	Percent of students receiving free and reduced lunch, parents' education level, parents' household income, unemployment rates in the attendance area, etc.
<input type="checkbox"/> Student Behavior	The number or percentage of discipline referrals or incidents; the number or percentage of student suspensions and expulsions; frequency of gang related, substance abuse or other at-risk behavior.
<input type="checkbox"/> Limited English Proficiency	The percentage of students who are English language learners. The percentage of families who speak English as a second language.
Student Achievement	Possible Indicators
<input type="checkbox"/> Academic Performance	FCAT and local tests; levels of proficiency attained (AYP); progress on desired outcomes: results of performance assessments or student portfolios, examples of student work, classroom assessments and grades.
<input type="checkbox"/> Other Performance based Data	Information from portfolios, exhibits, performance assessments that describe student standards based achievement.

⁴ Source: US Department of Education's *Designing Schoolwide Programs Non-Regulatory Guidance*

Student Achievement	Possible Indicators
<input type="checkbox"/> Multi Year Trends	Academic achievement data from several years.
<input type="checkbox"/> Completion Rates	Promotion/graduation rate, retention rates.
<input type="checkbox"/> Comparative Data	Performance of disadvantaged students against all other meaningful categories of students in the school or in the district; comparison of performances of students in various ethnic or programmatic subgroups (i.e., SWDs, ELLs, migrant students, etc.).
<input type="checkbox"/> Post Secondary	Number or percent of students attending and/or completing post-secondary schools; number or percent of students accepted into the armed forces.
Curriculum and Instruction	Possible Indicators
<input type="checkbox"/> Learning Expectations	Expectations that are communicated to the community, teachers, parents and students about what students can and should learn, including written standards, goals or benchmarks that reflect classroom and school practice and are based on the Sunshine State Standards.
<input type="checkbox"/> Instructional Program	Instructional activities, programs or strategies used to teach the Sunshine State Standards.
<input type="checkbox"/> Instructional Materials	The amount and quality of instructional materials, including textbooks, supplementary resources, publication dates of the grade level-adopted texts; the extent to which available materials are consistent with the Sunshine State Standards.
<input type="checkbox"/> Instructional Technology	The extent to which teachers use technology as a means to increase student achievement; type of computer system(s) available to students, faculty and administration for instructional purposes; availability of modern equipment, software and printers, especially appropriate adaptive devices and software tools to serve the needs of SWDs.

<input type="checkbox"/> Support Personnel	Supplementary use of paraprofessionals and other staff; available professional and paraprofessional staff to assist students, particularly the lowest achieving, to include SWDs and ELLs.
High-quality Professional Staff	Possible Indicators
<input type="checkbox"/> Staff Preparation	Number of teachers, administrators, years of teaching or administrative experience; types of certificates held, other special skills or knowledge.
<input type="checkbox"/> Staff Specialists and other Support Staff	Number of content or program specialists such as reading teachers, mathematics or science specialists, counselors or psychologists, social workers, health staff, etc.
<input type="checkbox"/> Professional Development	The existence of district and school level professional opportunities available to teachers; the number of professional days or district resources dedicated to professional development; evaluations of professional development sessions and the amount of teacher generated professional development.
<input type="checkbox"/> Staff Demographics	Ethnicity, gender breakdowns of staff and administration, retirement projections, and an analysis of whether the ethnicity of the school staff reflects the same ethnic groups as students.
<input type="checkbox"/> School Administrators	Number of administrators and roles; years of experience, specialized training and advanced degrees.
Family and Community Involvement	Possible Indicators
<input type="checkbox"/> Parental Involvement	Evidence of a parental involvement plan for volunteering, home learning activities, program review and development.
<input type="checkbox"/> Communication with Parents	Amount and frequency of information disseminated to parents, and the quality of information disseminated; use of multiple languages.
<input type="checkbox"/> Parent Community Roles	Amount and frequency of opportunities for parent and community involvement in decision making.
<input type="checkbox"/> Parent Training	Types of training opportunities offered to parents; parent workshop evaluations; evidence of teachers trained in parental involvement.

<input type="checkbox"/> Support for Families	Availability of information, training and services to adequately address the educational needs of students with learning disabilities or special educational needs as a result of poverty, ELL status, or migratory life style.
<input type="checkbox"/> Health Services	Availability of school linked health and social services for students and families, including counselors, psychologists, medical professionals, and nurse practitioners.
School Context and Organization	Possible Indicators
<input type="checkbox"/> School Mission/Vision	Statement of the underlying philosophy of the school.
<input type="checkbox"/> Average Class Size	Staff/child ratio, average class size, computed by grade or grade spans.
<input type="checkbox"/> School Climate	Quality of student-teacher interactions, student attitudes toward school, teacher job satisfaction, teacher expectations and beliefs about what students can accomplish.
<input type="checkbox"/> Coordination Plan	Description of the activities conducted to ensure that students' instructional day or program is coordinated so that student learning is not fragmented.
<input type="checkbox"/> Management and Governance	Presence of engaged principals, teacher input into decision making, the organization of teachers by teams.
<input type="checkbox"/> Student Discipline Policy	Clearly defined and articulated student management and discipline policy, including policies that pertain to SWDs.

APPENDIX V: SAMPLE DATA COLLECTION GUIDE FOR USE IN THE NEEDS ASSESSMENT AND THE EVALUATION⁵


The following chart is designed to help the school planning team collect and manage information collected for the comprehensive needs assessment. Fill in specific sources of information currently available, then list any additional information needed. Each focus area should have sufficient data to assist in making judgments about the status of each focus area.

Methods of Data Collection	Student Achievement	Curriculum and Instruction	High quality Professional Development	Family and Community Involvement	School Context and Organization
Self Assessment					
Observations					
Interviews and/or Surveys					
School Records					
Group Discussions					
Evaluation/Data Reports					
Student Work					
Other Information					

⁵ Source: US Department of Education's *Designing Schoolwide Programs Non-Regulatory Guidance*

**APPENDIX VI: CROSSWALK OF SCHOOLWIDE PLAN REQUIREMENTS
AND THE FLORIDA DEPARTMENT OF EDUCATION'S SCHOOL
IMPROVEMENT PLAN TEMPLATE FOR 2007-2008**

SCHOOLWIDE PLAN REQUIREMENTS (PL 107-110, Section 1114(b)(1)(A)-(J))	LOCATION IN THE SCHOOL IMPROVEMENT PLAN
(A) Comprehensive Needs Assessment	Throughout (however, schools and LEAs must include other sources of data in the needs assessment, as illustrated in Question C-3)
(B) Schoolwide Reform Strategies	Additional Requirements – Schoolwide Improvement Model
(C) Instruction by Highly Qualified Teachers	Quality Staff and Goals Sections
(D) High Quality and Ongoing Professional Development	Goals Section
(E) Strategies to Attract High Quality Highly Qualified Teachers to High Need Schools	Quality Staff Section
(F) Increasing Parent Involvement	Parent Involvement Section
(G) Preschool Transition	Additional Requirements Section
(H) Measures to Include Teachers in Decision-Making	School Advisory Council Section
(I) Effective, Timely Additional Assistance	Additional Requirements and Goals Sections
(J) Coordination and Integration of Federal, State, and Local Services and Programs	Must be included as an addendum to the School Improvement Plan




2008 National Title I Conference
"Changing Performance"

**Maximizing the Impact of
Schoolwide Programs on Improving
Student Achievement**

Sandy Brown & Bill McGrady,
Student Achievement and School Accountability,
U. S. Department of Education

Nashville, Tennessee
February 2, 2008

1




Session Topics

Overview/Introduction

Evaluation/Annual Review of
Schoolwide Programs

Consolidating Funds in Schoolwide
Programs

2




**Schoolwide Programs – Major
Monitoring Findings/Observations**

Major findings/observations over the last four+ years:

- Schoolwide plans did not consistently contain all of the ten required components (including those situations where school improvement and schoolwide plans were in a single document)
- Plans had not been reviewed on an annual basis (sometimes for several years)
- Specific elements were not readily identifiable

3




Schoolwide Programs – Major Monitoring Findings/Observations

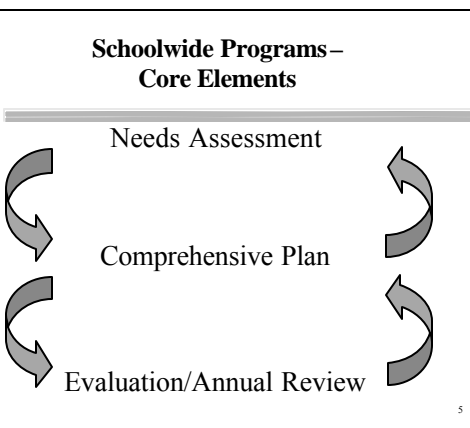
Major findings/observations (continued):

- School staff sometimes could not explain the intents and purposes of being a schoolwide program (why are we schoolwide?)
- Plans sometimes lacked clear direction, goals, objectives, reform strategies, and evaluation mechanisms or were so vague that it was not clear how these plans guided the school improvement process
- Plans did not address all of the grades in the school

4




Schoolwide Programs – Core Elements



```
graph TD; NA[Needs Assessment] --> CP[Comprehensive Plan]; CP --> EA[Evaluation/Annual Review]; EA --> NA;
```

5




Schoolwide Programs – 10 Required Components

Required Components:

- ✓ **Comprehensive** needs assessment
- ✓ Schoolwide reform strategies
- ✓ Instruction by highly qualified teachers
- ✓ **High-quality** and **ongoing** professional development
- ✓ Strategies to attract highly qualified teachers to high-need schools (new in NCLB)
- ✓ Strategies to increase **parental involvement**

6




Schoolwide Programs – The Comprehensive Plan

Required Components (continued):

- ✓ Plans for assisting **preschool students** in the successful **transition** from early childhood programs to local elementary schoolwide programs
- ✓ Measures to include teachers in the decisions regarding the use of academic assessments
- ✓ Activities to ensure that students who experience difficulty attaining proficiency receive **effective and timely additional assistance**
- ✓ **Coordination** and **integration** of Federal, State, and local services and programs (new in NCLB)

7




Schoolwide Programs – The Comprehensive Plan – Key Points

Key points to consider:

- Prioritize** major issues and address the most pressing ones initially
- Goals** (both achievement and operational) should be drafted
- Research-based strategies and action steps** should be developed to address the goals that were established

8




Schoolwide Programs – Program Evaluation/Annual Review – Statutory Requirement

Statutory Requirement – Annually evaluate the **implementation** of, and **results** achieved by, the schoolwide program using data from the State’s annual assessments and other indicators of academic achievement and revise the plan as necessary based on the results of the evaluation to ensure **continuous improvement** of students in the schoolwide school* (section 200.26(c) of the Title I regulations)

* For Title I purposes, evaluation means an annual review of the schoolwide strategies

9




Schoolwide Programs – Program Evaluation/Annual Review - Purposes

Purposes of Conducting an Annual Review*:

- ✓ Modify existing programs and track student achievement using data gathered throughout the year and at the end of the year
- ✓ Inform internal program management and help school leaders make informed decisions to improve the quality of their programs
- ✓ Answer stakeholder questions and help them better understand how effectively the school is meeting its stated goals
- ✓ Increase the understanding of specific strategies and help the school determine the usefulness of activities it has undertaken to increase student achievement

10




Schoolwide Programs – Program Evaluation/Annual Review - Purposes

Purposes (continued)*:

- ✓ Promote interest in and support of programs or activities by illustrating certain strategies, their outcomes in terms of improving student achievement, and increasing support for their use

* Excerpted from the North Dakota Department of Public Instruction's "Ongoing Evaluation and Annual Review" document (January 2008)

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Schoolwide Programs – Program Evaluation/Annual Review

Two types of questions to ask:

- Is the program being implemented as it was planned (**operational aspect**)?
 - *Did we increase the amount and quality of instructional time?*
 - *Did we devote sufficient resources toward implementing the professional development portion of the schoolwide plan?*

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Schoolwide Programs – Program Evaluation/Annual Review

➤ Did the achievement of students in meeting the State’s academic standards increase to the desired level (**achievement aspect**)?

- *Did each group of students meet the specified achievement goals established in each of the core curriculum areas*
- *Were there particular grade levels that were lagging or were there particular goals within a subject area that were problematic?*

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Schoolwide Programs – Program Evaluation/Annual Review – Action Steps

Steps to complete in conducting the annual review*:

1. Identification of purpose and intended audiences
2. Identification of issues and development of review questions
3. Identification of data collection instruments
4. Collection of data
5. Analysis and interpretation of data
6. Reporting

* Designing Schoolwide Programs, Non -Regulatory Guidance, March 2006 – U. S. Department of Education

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Schoolwide Programs – Program Evaluation/ Annual Review – How One State Does It

Steps to follow:

1. Determine progress
2. Review and disaggregate data (student achievement, demographic, perception and program data)
3. Review goals and needs
4. Timeline
5. Schoolwide components
6. Address issues

* Excerpted from the North Dakota Department of Public Instruction’s “Ongoing Evaluation and Annual Review” document (January 2008)

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Schoolwide Programs – Program Evaluation/ Annual Review – A Sample Process – Goal Review

Review of Goals – Steps to Complete for Each Goal:

1. List the data you may use to assess these activities and the achievement of your goal. Include student assessment data and implementation effectiveness data, and if possible, disaggregated information.
2. First data analysis.
3. Organize and graph the data.
4. Questions for further analysis.
“How are we doing”?

* Excerpted from the North Dakota Department of Public Instruction’s “Ongoing Evaluation and Annual Review” document (January 2008)

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Schoolwide Programs – Program Evaluation/ Annual Review – A Sample Process – Goal Review

Goal Summary:

Are we making progress toward reaching our schoolwide goals?


Do we need to gather more and better data?

Are there interactions among the goals, activities, and data that we have reviewed? Can we use this information to improve our schoolwide program?

What changes, based on all of the data reviewed, do we need to make to our schoolwide plan?

* Excerpted from the North Dakota Department of Public Instruction’s “Ongoing Evaluation and Annual Review” document (January 2008)

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Questions from USED Title I Non-Regulatory Schoolwide Guidance (March 2006)

D-1. Since the progress of all schools is evaluated using the results from State assessments to determine if they made AYP, why must schoolwide program schools conduct an additional annual review?

The annual review goes beyond this measure to examine all aspects and goals of the schoolwide plan. The annual review should examine information related to teacher quality, parental involvement, consolidation and coordination of funds and other components that directly and indirectly affect achievement. The annual review is designed to reveal areas of strength within the program and areas that need revision in order to better position the school to continue improving and make AYP.

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Questions from USED Title I Non-Regulatory Schoolwide Guidance (March 2006)

D-2 What if the review indicates that a particular strategy is not being fully implemented or not having the intended impact on student achievement?

This is an indication that changes are needed. In such cases, the school must identify and address the issues that prevented the strategy from being fully implemented or revise its existing plan to incorporate the revisions, as appropriate.

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Questions from USED Title I Non-Regulatory Schoolwide Guidance (March 2006)

D-3 May a school that is operating a schoolwide program which has not been effective in increasing the achievement of its students be required to discontinue the schoolwide program and operate a targeted assistance program?

If, over a period of time, a school that is operating a schoolwide program has not been effective in increasing the achievement of its students, the LEA may require the school to discontinue the schoolwide program and operate a targeted assistance program.

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U.S. Department of Education Websites

Designing Schoolwide Programs, Non-Regulatory Guidance, March 2006:
<http://www.ed.gov/policy/elsec/guid/designingswpguid.doc>

Implementing Schoolwide Programs, an Idea Book on Planning, volume I:
http://www.ed.gov/pubs/Idea_Planning/index.html

Implementing Schoolwide Programs, an Idea Book on Planning, volume II:
<http://www.ed.gov/PDFDocs/Implement2.pdf>

21

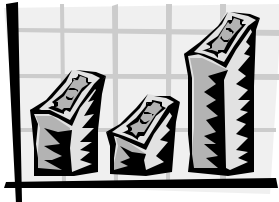
Disclaimer

The State examples shared in this presentation are merely illustrative of possible ways of annually evaluating/reviewing schoolwide programs. Use of these examples in this presentation does not constitute endorsement of these processes or materials, nor is there an implied requirement to use these processes or materials.


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And Now

Here's Sandy:



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2008 National Title I Conference
"Changing Performance"

**Consolidating Funds
Schoolwide Programs**

Sandy Brown & Bill McGrady,
Student Achievement and School Accountability,
U. S. Department of Education

Nashville, Tennessee
February 2, 2008


1



Introduction
Basic Schoolwide Provisions

- Schools with 40% or more poverty may use Title I, Part A funds along with other Federal, State, and local funds to upgrade the entire educational program in school to improve the academic performance of all students.
- A school must conduct a comprehensive needs assessment of the entire school and, using data from the needs assessment, develop a comprehensive plan.


2



Basic Schoolwide Provisions
(Continued)

- A school is not required to identify specific students as eligible to participate in a schoolwide program, or to demonstrate that the services provided in the school with Title I funds are supplemental to services that would otherwise be provided.
- A school may consolidate funds from Federal, State, and local sources to implement its comprehensive plan to upgrade its entire educational program.

3




Basic Schoolwide Provisions
(Continued)

In consolidating State and local funds with funds from Title I, Part A and most other Federal elementary and secondary programs administered by the Department—

- A school does not need to meet most of the statutory and regulatory requirements of the Federal programs included in the consolidation as long as it meets the intent and purposes of those programs.
- Is not required to maintain separate fiscal accounting records by program that identify the specific activities supported by program's funds in order to demonstrate that the activities are allowable under the program.

4




Basic Schoolwide Provisions
(Continued)

Each school, however, must—

- Identify the specific programs being consolidated, and the amount each program contributes to the consolidation.
- Maintain records that demonstrate that its schoolwide program addresses the intent and purposes of each of the Federal programs whose funds are being consolidated to support the schoolwide program.


5



Why Consolidate Funds?

- Helps a school to design and implement an effective comprehensive plan to upgrade the entire educational program in the school based on the school's needs identified through its comprehensive needs assessment.
- Enables a school to meet its needs using all of the resources available to it, thus giving the school more flexibility in how it uses available resources to meet the specifically identified needs of its students.

6




Why Consolidate Funds?

(Continued)

- Eases the requirements for accounting for specific program funds separately, because a schoolwide school is not required to distinguish among funds received from different sources when accounting for their use.
- Does not require a school to maintain separate fiscal accounting records, by Federal program, that identify the specific activities supported by each program's funds in order to demonstrate that those activities are allowable under the program.
- Does not require a school to meet most of the statutory and regulatory requirements of the specific Federal programs included in the consolidation --But the school must ensure that it meets the intent and purposes of the Federal programs included in the consolidation so that the needs of the intended beneficiaries are met.


7



What does it mean to consolidate funds?

- A schoolwide school treats the funds it is consolidating like they are a single "pool" of funds—in other words, funds from the contributing programs in the school lose their individual identity and the school has one flexible pool of funds.
- The school uses funds from this consolidated schoolwide pool to support any activity of the schoolwide program without regard to which program contributed the specific funds used for a particular activity.

8




What does it mean to consolidate funds?

(Continued)

- A schoolwide school must identify in its schoolwide plan which programs are included in its consolidation and the amount each program contributes to the consolidated schoolwide pool.
- Remember: an LEA must ensure that such a school meets the supplement not supplant requirement as it relates to a schoolwide program--i.e., each school operating a schoolwide program must receive all the State and local funds it would otherwise receive to operate its educational program in the absence of Title I, Part A or other Federal education funds.

9



Examples of procedures to account for funds that have been consolidated

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Example 1: LEA Creates a Single Schoolwide Account Pool with its Own Accounting Code

Program Contributing Funds to the Consolidated Schoolwide Pool						
School Building	Federal Funds				State & Local Funds	Total for Each Building
	Title I - A Disadvantaged	Title II - A Improving Teacher Quality	Title IV - A Safe & Drug Free Schools	IDEA - B		
A	\$182,535	\$25,000	\$10,685	\$94,462	\$2,048,115	\$2,360,797
B	115,455	25,000	20,071	27,709	1,380,884	1,569,119
C	181,780	25,000	23,686	69,272	1,940,161	2,239,899
D	141,900	110,437	22,351	93,202	1,999,902	2,367,792
E	229,460	110,437	27,546	61,715	1,936,291	2,365,449
F	169,860	110,437	23,796	54,158	1,525,307	1,883,558
Total Funds LEA Distributes to Individual Schools	1,020,990	406,311	128,135	400,518	10,830,660	12,786,614
Percent of Total	8%	3%	1%	3%	85%	100%

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Example 2: Distribution of Expenditures Based on Revenues

Source of Funds	Revenues	Percent of Total	Expenditures
Total	\$1,000,000	100.0%	\$950,000
State & Local Funds (included in schoolwide program)	520,000	52.0%	494,000
Federal Programs (included in schoolwide program)			
Title I, Part A	240,000	24.0%	228,000
Title II, Part A- Improving Teacher Quality	40,000	4.0%	38,000
IDEA Part B (Special Education)	50,000	5.0%	47,500
Title V, Part A	70,000	7.0%	66,500
Carl D. Perkins Career and Technical Education Act	80,000	8.0%	76,000


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Example 3: Sequence Charging of Schoolwide Expenditures

Source of Funds	Revenues	Total Expenditures (\$950,000) Charged to Federal, State, & Local Programs	Amount Remaining
Total	\$1,000,000		
State & Local Funds (included in schoolwide program)	520,000	- 520,000	
Federal Programs (included in schoolwide program)			
Title I, Part A	240,000	- 240,000	
Title II, Part A- Improving Teacher Quality	40,000	- 40,000	
IDEA Part B (Special Education)	50,000	- 50,000	
Title V, Part A	70,000	- 70,000	
Carl D. Perkins Career and Technical Education Act	80,000	- 30,000	50,000




Specific Questions and Answers



1. May a schoolwide program school consolidate only its Federal funds?

Yes, but remember this may not be as effective as when a school consolidates Federal, State, & local funds because it does not give the school the flexibility to use all of its available resources to meet the identified needs of its students.




1. May a schoolwide program school consolidate only its Federal funds?

Considerations:

- Federal funds included in a school’s comprehensive schoolwide program plan are part of a single Federal consolidated schoolwide pool.
- Funds from the contributing Federal programs lose their individual identity as part of a consolidated schoolwide pool are accounted for as part of that pool rather than by the individual programs that contribute to the consolidated schoolwide pool.
- School does not need to meet most of the statutory and regulatory requirements of the Federal programs included in the consolidation as long as it meets the intent and purposes of those programs.


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2. What activities in a schoolwide program may consolidated Federal funds, including Title I, Part A funds, support?

- Title I, Part A funds and other consolidated Federal funds must be used to address the specific educational needs of the school identified by the needs assessment and articulated in the comprehensive plan.
- Use of those funds is governed by the cost principles in Office of Management and Budget (OMB) Circular A-87.


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3. If a school operates a schoolwide program but does not consolidate its Title I, Part A funds with other Federal, State, and local funds, what activities may Part A funds support?

- A school must use its Title I, Part A funds to address the specific educational needs identified in the needs assessment and articulated in the comprehensive schoolwide plan.
- All children in the school may participate in activities funded with Part A funds (consistent with the school’s comprehensive schoolwide program plan), and the school does not need to demonstrate that those activities are supplemental to ones that would otherwise be provided by the school.

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3. If a school operates a schoolwide program but does not consolidate its Title I, Part A funds with other Federal, State, and local funds, what activities may Part A funds support?

Keep in mind:

- Use of Title I, Part A funds in this situation would be governed by the cost principles in OMB Circular A-87.
- Because Title I, Part A funds are not consolidated with other Federal, State, and local funds, the school and LEA must account for and track Title I, Part A funds separately, identifying the activities that the Part A funds support.

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4. May Title I, Part A funds in a schoolwide program school be used for basic operational expenses such as building maintenance and repairs, landscaping, and custodial services?

It depends:

- When Title I, Part A funds are consolidated with State & local funds as described in the Examples 1, 2 & 3, they lose their identity, and, thus, it is impossible to know on what specific activities Part A funds are spent.
- To meet the schoolwide supplement not supplant requirement, an LEA must ensure that each school operating a schoolwide program receives all the State and local funds it would otherwise need to operate in the absence of Federal funds (including State and local funds necessary to provide for routine operating expenses such as building maintenance and repairs, landscaping and custodial services).
- Thus, even though Title I, Part A funds are included in the consolidated pool of resources available to the school that may support, for example, building maintenance and repair, landscaping, or custodial services, there must also be sufficient State and local funds in that consolidated pool to cover non-educational activities.


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4. May Title I, Part A funds in a schoolwide program school be used for basic operational expenses such as building maintenance and repairs, landscaping, and custodial services?

- In the situation where just Title I, Part A funds (or Part A and other Federal funds) are included in a schoolwide consolidation, those funds must be used to address the educational needs of a school as identified by its needs assessment and articulated in its comprehensive schoolwide plan.
- In this situation, Part A (and other Federal education) funds included in the schoolwide consolidated pool may not be used for non-educational activities such as building maintenance and repairs, landscaping, and custodial services.
- Use of Part A funds is governed by OMB Circular A-87.


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5. How does an LEA document employee time and effort in schools that operate schoolwide programs?

Application of the OMB Circular A-87 requirements to employees in a school operating a schoolwide program varies depending on the extent to which Federal funds are consolidated.


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5. How does an LEA document employee time and effort in schools that operate schoolwide programs?
(Continued)

- **If a school operating a schoolwide program consolidates Federal, State, & local funds in a consolidated schoolwide pool, an employee who is paid with funds from that pool is not required to file a semi-annual certification.**
- **Because Federal funds are consolidated with State and local funds in a single consolidated schoolwide pool, there is no distinction between staff paid with Federal funds and staff paid with State or local funds.**


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5. How does an LEA document employee time and effort in schools that operate schoolwide programs?
(Continued)

However:
If a school operating a schoolwide program does not consolidate Federal funds with State and local funds in a consolidated schoolwide pool, an employee who works solely on a single cost objective (i.e., a single Federal program whose funds have not been consolidated or Federal programs whose funds have been consolidated but not with State and local funds) must furnish a semi-annual certification that he/she has been engaged solely in activities supported by the applicable source in accordance with OMB Circular A-87, Attachment B, paragraph 8.h(3).

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Disclaimer

The examples shared in this presentation are illustrative of possible ways to account for Federal funds in a schoolwide setting. Use of the examples in this presentation does not constitute endorsement of these processes, nor is there an implied requirement to use these processes.

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**PUBLIC LAW
AND
FEDERAL REGULATIONS**

PUBLIC LAW 107-110**“SEC. 1114. SCHOOLWIDE PROGRAMS.****“(a) USE OF FUNDS FOR SCHOOLWIDE PROGRAMS.—**

“(1) IN GENERAL.—A local educational agency may consolidate and use funds under this part, together with other Federal, State, and local funds, in order to upgrade the entire educational program of a school that serves an eligible school attendance area in which not less than 40 percent of the children are from low-income families, or not less than 40 percent of the children enrolled in the school are from such families.

“(2) IDENTIFICATION OF STUDENTS NOT REQUIRED.—

“(A) IN GENERAL.—No school participating in a schoolwide program shall be required—

“(i) to identify particular children under this part as eligible to participate in a schoolwide program; or

“(ii) to provide services to such children that are supplementary, as otherwise required by section 1120A(b).

“(B) SUPPLEMENTAL FUNDS.—A school participating in a schoolwide program shall use funds available to carry out this section only to supplement the amount of funds that would, in the absence of funds under this part, be made available from non-Federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency.

“(3) EXEMPTION FROM STATUTORY AND REGULATORY REQUIREMENTS.—

“(A) EXEMPTION.—Except as provided in subsection (b), the Secretary may, through publication of a notice in the Federal Register, exempt schoolwide programs under this section from statutory or regulatory provisions of any other noncompetitive formula grant program administered by the Secretary (other than formula or discretionary grant programs under the Individuals with Disabilities Education Act, except as provided in section 613(a)(2)(D) of such Act), or any discretionary grant program administered by the Secretary, to support schoolwide programs if the intent and purposes of such other programs are met.

“(B) REQUIREMENTS.—A school that chooses to use funds from such other programs shall not be relieved of the requirements relating to health, safety, civil rights, student and parental participation and involvement, services to private school children, maintenance of effort, comparability of services, uses of Federal funds to supplement, not supplant non-Federal funds, or the distribution of funds to State educational agencies or local educational agencies that apply to the receipt of funds from such programs.

“(C) RECORDS.—A school that consolidates and uses funds from different Federal programs under this section shall not be required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those particular funds as long as the school maintains records that demonstrate that the schoolwide program, considered as a whole, addresses the intent and purposes of each of the Federal programs that were consolidated to support the schoolwide program.

“(4) PROFESSIONAL DEVELOPMENT.—Each school receiving funds under this part for any fiscal year shall devote sufficient resources to effectively carry out the activities described in subsection (b)(1)(D) in accordance with section 1119 for such fiscal year, except that a school may enter into a consortium with another school to carry out such activities.

“(b) COMPONENTS OF A SCHOOLWIDE PROGRAM.—

“(1) IN GENERAL.—A schoolwide program shall include the following components:

“(A) A comprehensive needs assessment of the entire school (including taking into account the needs of migratory children as defined in section 1309(2)) that is based on information which includes the achievement of children in relation to the State academic

content standards and the State student academic achievement standards described in section 1111(b)(1).

“(B) Schoolwide reform strategies that—

“(i) provide opportunities for all children to meet the State’s proficient and advanced levels of student academic achievement described in section 1111 (b)(1)(D);

“(ii) use effective methods and instructional strategies that are based on scientifically based research that—

“(I) strengthen the core academic program in the school;

“(II) increase the amount and quality of learning time, such as providing an extended school year and before- and after-school and summer programs and opportunities, and help provide an enriched and accelerated curriculum; and

“(III) include strategies for meeting the educational needs of historically underserved populations;

“(iii)(I) include strategies to address the needs of all children in the school, but particularly the needs of low-achieving children and those at risk of not meeting the State student academic achievement standards who are members of the target population of any program that is included in the schoolwide program, which may include—

“(aa) counseling, pupil services, and mentoring services;

“(bb) college and career awareness and preparation, such as college and career guidance, personal finance education, and innovative teaching methods, which may include applied learning and team-teaching strategies; and

“(cc) the integration of vocational and technical education programs; and

“(II) address how the school will determine if such needs have been met; and

“(iv) are consistent with, and are designed to implement, the State and local improvement plans, if any.

“(C) Instruction by highly qualified teachers.

“(D) In accordance with section 1119 and subsection

(a)(4), high-quality and ongoing professional development for teachers, principals, and paraprofessionals and, if appropriate, pupil services personnel, parents, and other staff to enable all children in the school to meet the State’s student academic achievement standards.

“(E) Strategies to attract high-quality highly qualified teachers to high-need schools.

“(F) Strategies to increase parental involvement in accordance with section 1118, such as family literacy services.

“(G) Plans for assisting preschool children in the transition from early childhood programs, such as Head Start, Even Start, Early Reading First, or a State-run preschool program, to local elementary school programs.

“(H) Measures to include teachers in the decisions regarding the use of academic assessments described in section 1111(b)(3) in order to provide information on, and to improve, the achievement of individual students and the overall instructional program.

“(I) Activities to ensure that students who experience difficulty mastering the proficient or advanced levels of academic achievement standards required by section 1111 (b)(1) shall be provided with effective, timely additional assistance which shall include measures to ensure that students’ difficulties are identified on a timely basis and to provide sufficient information on which to base effective assistance.

“(J) 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.

“(2) PLAN.—

“(A) IN GENERAL.—Any eligible school that desires to operate a schoolwide program shall first develop (or amend a plan for such a program that was in existence on the day before the date of enactment of the No Child Left Behind Act of 2001), in consultation with the local educational agency and its school support team or other technical assistance provider under section 1117, a comprehensive plan for reforming the total instructional program in the school that—

“(i) describes how the school will implement the components described in paragraph (1);

“(ii) describes how the school will use resources under this part and from other sources to implement those components;

“(iii) includes a list of State educational agency and local educational agency programs and other Federal programs under subsection (a)(3) that will be consolidated in the schoolwide program; and

“(iv) describes how the school will provide individual student academic assessment results in a language the parents can understand, including an interpretation of those results, to the parents of a child who participates in the academic assessments required by section 1111(b)(3).

“(B) PLAN DEVELOPMENT.—The comprehensive plan shall be—

“(i) developed during a one-year period, unless—

“(I) the local educational agency, after considering the recommendation of the technical assistance providers under section 1117, determines that less time is needed to develop and implement the schoolwide program; or

“(II) the school is operating a schoolwide program on the day preceding the date of enactment of the No Child Left Behind Act of 2001, in which case such school may continue to operate such program, but shall develop amendments to its existing plan during the first year of assistance after that date to reflect the provisions of this section;

“(ii) developed with the involvement of parents and other members of the community to be served and individuals who will carry out such plan, including teachers, principals, and administrators (including administrators of programs described in other parts of this title), and, if appropriate, pupil services personnel, technical assistance providers, school staff, and, if the plan relates to a secondary school, students from such school;

“(iii) in effect for the duration of the school’s participation under this part and reviewed and revised, as necessary, by the school;

“(iv) available to the local educational agency, parents, and the public, and the information contained in such plan shall be in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand; and

“(v) if appropriate, developed in coordination with programs under Reading First, Early Reading First, Even Start, Carl D. Perkins Vocational and Technical Education Act of 1998, and the Head Start Act.

“(c) PREKINDERGARTEN PROGRAM.—A school that is eligible for a schoolwide program under this section may use funds made available under this part to establish or enhance prekindergarten programs for children below the age of 6, such as Even Start programs or Early Reading First programs.

FEDERAL REGULATIONS

§ 200.25 Schoolwide programs in general.

(a) *Purpose.*

- (1) The purpose of a schoolwide program is to improve academic achievement throughout a school so that all students, particularly the lowest-achieving students, demonstrate proficiency related to the State's academic standards under §200.1.
- (2) The improved achievement is to result from improving the entire educational program of the school.

(b) *Eligibility.*

- (1) A school may operate a schoolwide program if—
 - (i) The school's LEA determines that the school serves an eligible attendance area or is a participating school under section 1113 of the ESEA; and
 - (ii) For the initial year of the schoolwide program—
 - (A) The school serves a school attendance area in which not less than 40 percent of the children are from low-income families; or
 - (B) Not less than 40 percent of the children enrolled in the school are from low-income families.
- (2) In determining the percentage of children from low-income families under paragraph (b)(1)(ii) of this section, the LEA may use a measure of poverty that is different from the measure or measures of poverty used by the LEA to identify and rank school attendance areas for eligibility and participation under subpart A of this part.

(c) *Participating students and services.* A school operating a schoolwide program is not required to—

- (1) Identify particular children as eligible to participate; or
- (2) As required under section 1120A(b) of the ESEA, provide services that supplement, and do not supplant, the services participating children would otherwise receive if they were not participating in a program under subpart A of this part.

(d) *Supplemental funds.* A school operating a schoolwide program must use funds available under subpart A of this part and under any other Federal program included under paragraph (e) of this section and §200.29 only to supplement the total amount of funds that would, in the absence of the Federal funds, be made available from non-Federal sources for that school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency.

(e) *Consolidation of funds.* An eligible school may, consistent with §200.29, consolidate and use funds or services under subpart A of this part, together with other Federal, State, and local funds that the school receives, to operate a schoolwide program in accordance with §§200.25 through 200.29.

(f) *Prekindergarten program.* A school operating a schoolwide program may use funds made available under subpart A of this part to establish or enhance prekindergarten programs for children below the age of 6, such as Even Start programs or Early Reading First programs.

(Authority: 20 U.S.C. 6314)
[67 FR 71718, Dec. 2, 2002]

§ 200.26 Core elements of a schoolwide program.

(a) *Comprehensive needs assessment.*

- (1) A school operating a schoolwide program must conduct a comprehensive needs assessment of the entire school that—

- (i) Is based on academic achievement information about all students in the school, including all groups under §200.13(b)(7) and migratory children as defined in section 1309(2) of the ESEA, relative to the State's academic standards under §200.1 to—
 - (A) Help the school understand the subjects and skills for which teaching and learning need to be improved; and
 - (B) Identify the specific academic needs of students and groups of students who are not yet achieving the State's academic standards; and
 - (ii) Assesses the needs of the school relative to each of the components of the schoolwide program under §200.28.
- (2) The comprehensive needs assessment must be developed with the participation of individuals who will carry out the schoolwide program plan.
- (3) The school must document how it conducted the needs assessment, the results it obtained, and the conclusions it drew from those results.

(b) *Comprehensive plan.* Using data from the comprehensive needs assessment under paragraph (a) of this section, a school that wishes to operate a schoolwide program must develop a comprehensive plan, in accordance with §200.27, that describes how the school will improve academic achievement throughout the school, but particularly for those students furthest away from demonstrating proficiency, so that all students demonstrate at least proficiency on the State's academic standards.

- (c) *Evaluation.* A school operating a schoolwide program must—
- (1) Annually evaluate the implementation of, and results achieved by, the schoolwide program, using data from the State's annual assessments and other indicators of academic achievement;
 - (2) Determine whether the schoolwide program has been effective in increasing the achievement of students in meeting the State's academic standards, particularly for those students who had been furthest from achieving the standards; and
 - (3) Revise the plan, as necessary, based on the results of the evaluation, to ensure continuous improvement of students in the schoolwide program.

(Approved by the Office of Management and Budget under control number 1810–0581)
 (Authority: 20 U.S.C. 6314)
 [67 FR 71718, Dec. 2, 2002]

§ 200.27 Development of a schoolwide program plan.

- (a)(1) A school operating a schoolwide program must develop a comprehensive plan to improve teaching and learning throughout the school.
- (2) The school must develop the comprehensive plan in consultation with the LEA and its school support team or other technical assistance provider under section 1117 of the ESEA.
- (3) The comprehensive plan must—
- (i) Describe how the school will carry out each of the components under §200.28;
 - (ii) Describe how the school will use resources under subpart A of this part and from other sources to carry out the components under §200.28; and
 - (iii) Include a list of State and local programs and other Federal programs under §200.29 that the school will consolidate in the schoolwide program.
- (b)(1) The school must develop the comprehensive plan, including the comprehensive needs assessment, over a one-year period unless—
- (i) The LEA, after considering the recommendations of its technical assistance providers under section 1117 of the ESEA, determines that less time is needed to develop and implement the schoolwide program; or
 - (ii) The school was operating a schoolwide program on or before January 7, 2002, in which case the school may continue to operate its program, but must amend its existing plan to reflect the provisions of §§200.25 through 200.29 during the 2002–2003 school year.

- (2) The school must develop the comprehensive plan with the involvement of parents, consistent with the requirements of section 1118 of the ESEA, and other members of the community to be served and individuals who will carry out the plan, including—
- (i) Teachers, principals, and administrators, including administrators of programs described in other parts of Title I of the ESEA;
 - (ii) If appropriate, pupil services personnel, technical assistance providers, and other school staff; and
 - (iii) If the plan relates to a secondary school, students from the school.
- (3) If appropriate, the school must develop the comprehensive plan in coordination with other programs, including those carried out under Reading First, Early Reading First, Even Start, the Carl D. Perkins Vocational and Technical Education Act of 1998, and the Head Start Act.
- (4) The comprehensive plan remains in effect for the duration of the school's participation under §§200.25 through 200.29.

(c)(1) The schoolwide program plan must be available to the LEA, parents, and the public.

(2) Information in the plan must be—

- (i) In an understandable and uniform format, including alternative formats upon request; and
- (ii) To the extent practicable, provided in a language that the parents can understand.

(Approved by the Office of Management and Budget under control number 1810–0581)

(Authority: 20 U.S.C. 6314)

[67 FR 71719, Dec. 2, 2002]

§ 200.28 Schoolwide program components.

A schoolwide program must include the following components:

(a) *Schoolwide reform strategies.* The schoolwide program must incorporate reform strategies in the overall instructional program. Those strategies must—

- (1) Provide opportunities for all students to meet the State's proficient and advanced levels of student academic achievement;
- (2)(i) Address the needs of all students in the school, particularly the needs of low-achieving students and those at risk of not meeting the State's student academic achievement standards who are members of the target population of any program included in the schoolwide program; and
- (ii) Address how the school will determine if those needs have been met;
- (3) Use effective methods and instructional practices that are based on scientifically based research, as defined in section 9101 of the ESEA, and that—
 - (i) Strengthen the core academic program;
 - (ii) Provide an enriched and accelerated curriculum;
 - (iii) Increase the amount and quality of learning time, such as providing an extended school year and before- and after-school and summer programs and opportunities;
 - (iv) Include strategies for meeting the educational needs of historically underserved populations; and
 - (v) Are consistent with, and are designed to implement, State and local improvement plans, if any.

(b) *Instruction by highly qualified teachers.* A schoolwide program must ensure instruction by highly qualified teachers and provide ongoing professional development. The schoolwide program must—

- (1) Include strategies to attract highly qualified teachers, as defined in §200.56;
- (2)(i) Provide high-quality and ongoing professional development in accordance with sections 1119 and 9101(34) of the ESEA for teachers, principals, paraprofessionals and, if appropriate, pupil services personnel, parents, and other staff, to enable all students in the school to meet the State's student academic standards; and
- (ii) Align professional development with the State's academic standards;
- (3) Devote sufficient resources to carry out effectively the professional development activities described in paragraph (b)(2) of this section; and

(4) Include teachers in professional development activities regarding the use of academic assessments described in §200.2 to enable them to provide information on, and to improve, the achievement of individual students and the overall instructional program.

(c) *Parental involvement.*

(1) A schoolwide program must involve parents in the planning, review, and improvement of the schoolwide program plan.

(2) A schoolwide program must have a parental involvement policy, consistent with section 1118(b) of the ESEA, that—

- (i) Includes strategies, such as family literacy services, to increase parental involvement in accordance with sections 1118(c) through (f) and 9101(32) of the ESEA; and
- (ii) Describes how the school will provide individual student academic assessment results, including an interpretation of those results, to the parents of students who participate in the academic assessments required by §200.2.

(d) *Additional support.* A schoolwide program school must include activities to ensure that students who experience difficulty attaining the proficient or advanced levels of academic achievement standards required by §200.1 will be provided with effective, timely additional support, including measures to—

- (1) Ensure that those students' difficulties are identified on a timely basis; and
- (2) Provide sufficient information on which to base effective assistance to those students.

(e) *Transition.* A schoolwide program in an elementary school must include plans for assisting preschool students in the successful transition from early childhood programs, such as Head Start, Even Start, Early Reading First, or a preschool program under IDEA or a State-run preschool program, to the schoolwide program.

(Approved by the Office of Management and Budget under control number 1810–0581)

(Authority: 20 U.S.C. 6314)

[67 FR 71719, Dec. 2, 2002]

§ 200.29 Consolidation of funds in a schoolwide program.

(a)(1) In addition to funds under subpart A of this part, a school may consolidate and use in its schoolwide program Federal funds from any program administered by the Secretary that is included in the most recent notice published for this purpose in the Federal Register.

(2) For purposes of §§200.25 through 200.29, the authority to consolidate funds from other Federal programs also applies to services provided to the school with those funds.

(b)(1) Except as provided in paragraphs (b)(2) and (c) of this section, a school that consolidates and uses in a schoolwide program funds from any other Federal program administered by the Secretary—

- (i) Is not required to meet the statutory or regulatory requirements of that program applicable at the school level; but
- (ii) Must meet the intent and purposes of that program to ensure that the needs of the intended beneficiaries of that program are addressed.

(2) A school that chooses to consolidate funds from other Federal programs must meet the requirements of those programs relating to—

- (i) Health;
- (ii) Safety;
- (iii) Civil rights;
- (iv) Student and parental participation and involvement;
- (v) Services to private school children;
- (vi) Maintenance of effort;
- (vii) Comparability of services;
- (viii) Use of Federal funds to supplement, not supplant non-Federal funds in accordance with §200.25(d); and
- (ix) Distribution of funds to SEAs or LEAs.

(c) A school must meet the following requirements if the school consolidates and uses funds from these programs in its schoolwide program:

(1) *Migrant education.* Before the school chooses to consolidate in its schoolwide program funds received under part C of Title I of the ESEA, the school must—

- (i) Use these funds, in consultation with parents of migratory children or organizations representing those parents, or both, first to meet the unique educational needs of migratory 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, as identified through the comprehensive Statewide needs assessment under §200.83; and
- (ii) Document that these needs have been met.

(2) *Indian education.* The school may consolidate funds received under subpart 1 of part A of Title VII of the ESEA if the parent committee established by the LEA under section 7114(c)(4) of the ESEA approves the inclusion of these funds.

(3) *Special education.*

- (i) The school may consolidate funds received under part B of the IDEA.
- (ii) However, the amount of funds consolidated may not exceed the amount received by the LEA under part B of IDEA for that fiscal year, divided by the number of children with disabilities in the jurisdiction of the LEA, and multiplied by the number of children with disabilities participating in the schoolwide program.
- (iii) The school may also consolidate funds received under section 8003(d) of the ESEA (Impact Aid) for children with disabilities in a schoolwide program.
- (iv) A school that consolidates funds under part B of IDEA or section 8003(d) of the ESEA may use those funds for any activities under its schoolwide program plan but must comply with all other requirements of part B of IDEA, to the same extent it would if it did not consolidate funds under part B of IDEA or section 8003(d) of the ESEA in the schoolwide program.

(d) A school that consolidates and uses in a schoolwide program funds under subpart A of this part or from any other Federal program administered by the Secretary—

- (1) Is not required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those particular funds; but
- (2) Must maintain records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each of the Federal programs whose funds were consolidated to support the schoolwide program.

(e) Each State must—

- (1) Encourage schools to consolidate funds from other Federal, State, and local sources in their schoolwide programs; and
- (2) Modify or eliminate State fiscal and accounting barriers so that schools can easily consolidate funds from other Federal, State, and local sources in their schoolwide programs.

(Authority: 20 U.S.C. 6314, 1413(a)(s)(D), 6396(b), 7703(d), 7815(c))
[67 FR 71720, Dec. 2, 2002; 68 FR 1008, Jan. 8, 2003]