

APPENDIX C: TITLE I SCHOOLWIDE MODEL FAQs

MAXIMIZING TITLE I FUNDS: THE SCHOOLWIDE PROGRAM MODEL Q & A

WHAT IS A SCHOOLWIDE PROGRAM MODEL VS. TARGETED ASSISTANCE?

The schoolwide program is authorized under Title I, Part A. It is a service delivery model for Title I schools that allows schools to support costs associated with whole school improvement to raise the achievement of all students, particularly those most academically at-risk. This is opposed to a Targeted Assistance school where funds may only be spent on Title I students.

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

If a school has selected to operate the schoolwide program model, has conducted a comprehensive needs assessment, has developed a schoolwide plan, and satisfies the supplemental funds test, it can make use of Title I funds in a variety of ways. (See [“What are some examples of flexibility in Action?” on page 20](#))

WHICH SCHOOLS ARE ELIGIBLE TO OPERATE SCHOOLWIDE PROGRAMS?

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

SUMMARY OF THE ELIGIBILITY CRITERIA FOR VARIOUS TITLE I SCHOOLS

SCHOOL STATUS	POVERTY THRESHOLD
Priority School	None
Focus School	None
Priority High School; graduation rate below 60%	None
Other Title I Schools	40%

WHAT MUST A DISTRICT DO TO MEET FISCAL REQUIREMENTS?

1. Meet the Supplemental funds test for schoolwide programs

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

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

SUPPLEMENTAL FUNDS TEST - EXAMPLES

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

Example 1 – Allocations Based on Staffing/Supply Assumption

A district allocates funds using following assumptions:

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

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

CALCULATION	CATEGORY	AMOUNT
12 x \$50,000	Funding for 12 teacher positions	\$600,000
1 x \$75,000	Funding for 1 principal position	\$75,000
300 x \$25	Per pupil allocation for technology	\$7,500
300 x \$50	Per pupil allocation for instructional materials	\$15,000
TOTAL		\$697,500

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

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

Example 2 – Allocations Based on Weighted Per-Pupil Formula

A district allocates funds using the following formula:

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

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

CALCULATION	CATEGORY	AMOUNT
500 x \$5,000	Base funding amount for 500 students	\$2,500,000
250 x \$500	Funding based on additional allocation for 250 students that are low-income/at-risk	\$125,000
100 x \$700	Funding based on additional allocation for 100 students that are English Language Learners	\$70,000
50 x \$1,500	Funding based on additional allocation for 50 students served by special education	\$75,000
TOTAL		\$2,770,000

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

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

2. Meet Comparability requirements

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

3. Fulfill Maintenance of Effort

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

4. Maintain Time and Effort

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

HOW CAN DISTRICTS AND SCHOOLS MAXIMIZE FLEXIBILITY?

Title I schools operating a schoolwide program may consolidate funds under Title I, Part A with other federal, state, and local funds to upgrade the school's entire educational program. Consolidating funds in a schoolwide program permits schools to spend other federal funds flexibly based upon school need. For example, a district may choose to allocate Title II funds to schools to support schoolwide initiatives (as opposed to retaining the Title II funds at the central level). If a schoolwide school then consolidates Title II funds with its Title I funds, the school would be permitted to use those consolidated funds on costs indicated as necessary by the school's needs assessment and schoolwide plan. In other words, if Title II funds are consolidated, those funds can be used more flexibly provided they are designed to upgrade the school's education program (and could include costs that typically would not be permitted under the Title II statute). Consolidated schoolwide programs become one pot of money, thus are not required to:

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

WHAT ARE SOME EXAMPLES OF FLEXIBILITY IN ACTION?

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

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

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

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

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

