



Office of Federal Programs Title I Schoolwide Program Questions and Answers

The purpose of Title I funds is to ensure that all children have a fair, equal and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging state academic achievement standards and state academic assessments. Title I funds are generated based on low-income students that attend the school; however, services are provided to students identified as having the greatest need for special assistance.

A targeted assistance program employs Highly Qualified Teachers (HQT) paid with Title I funds to serve only those students who have been identified as being most at-risk of not meeting the state's challenging standards. Multiple measures of student academic achievement are used to determine which students are eligible to participate in the program. Services to eligible students may be provided through extended learning time, or may be provided in the regular classroom.

A school operating a Schoolwide program is not required to identify particular students as eligible to participate in the Schoolwide program, but still needs to demonstrate that the services provided with Title I, Part A funds are supplemental to services that would otherwise be provided. A Schoolwide program gives the school significant flexibility to better serve all students by improving the entire instructional program, rather than providing separate services only to specific target populations. No distinctions are made between staff paid with Title I funds and staff that are not. All school staff are expected to direct their efforts toward upgrading the entire educational program and improving the achievement of all students, particularly those who are low achieving.

Schoolwide Eligibility and Process

- Qualify (minimum of 40 percent of the students in the school, or residing in the attendance area served by the school, are from low-income families OR schools that have been identified as priority or focus) and Decide.
- Notify Federal Programs Consultant in a comment in the CCIP History Log.
- Start the one-year planning process.
- Create building plan and complete Schoolwide components in the CCIP.
- Change service type to SW-New (authorized only at the start of the fiscal year with initial CCIP application) on the Building Eligibility page.

Planning Process

1. What if the school already has comprehensive plan in place?

To maintain focus, eliminate duplication of effort, and promote comprehensiveness, schools should operate under a single plan where possible. A school that already has a functional and comprehensive plan for School Improvement should align the Schoolwide plan with the existing plan, as long as it is based on a comprehensive needs assessment and can be updated to include the 10 required Schoolwide components.

Teacher Qualification Requirements

2. Are all teachers of core academic subjects and paraprofessionals working in a Schoolwide program school required to meet the requirements for highly qualified teachers and qualified paraprofessionals, or does the requirement only apply to those staff paid with Title I funds?

All teachers of core academic subjects and paraprofessionals who provide instructional support, not just those paid with Title I funds, must meet the teacher or paraprofessional qualifications in a Schoolwide program school.

3. With what requirements must Schoolwide program schools comply?

Schools operating a Schoolwide program must comply with the requirements relating to- health and safety, civil rights, participation and involvement of parents and students, private school students, teachers and other educational personnel. Applicable requirements concerning the equitable participation of eligible private school children, teachers and other educational personnel under other federal education programs also must be met. A school also must comply with Title I and IDEA-B Maintenance of Effort and Comparability of services. In addition, LEAs are required under the McKinney Vento Homeless Assistance act to designate a Homeless Liaison to ensure, among other things, that homeless children and youth enroll and succeed in school, the LEA is not relieved of these requirements by virtue of operating one or more Schoolwide programs. Schoolwide program schools also must document employee time and effort.

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

Attachment B.8.h (3) of OMB Circular A-87, which contains government-wide cost principles that apply to the use of Federal funds by state and local governments and federally recognized Indian tribal governments, provides that charges for the wages or salary of an employee who works solely on a single federal program or cost objective must be supported by periodic certifications that the employee worked solely on that program or cost objective. These certifications must be prepared at least semi-annually and must be signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee. If an employee works on multiple activities or cost objectives, Attachment B.8.h(4), (5), and (6) require the employee to prepare personnel activity reports or equivalent documentation to support a distribution of his or her salary or wages among the federal programs or cost objectives. Application of the [OMB Circular A-87](#) requirements to employees in a school operating a Schoolwide program varies under different circumstances. For example:

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, in whole or in part, on a federal program or cost objective must meet the OMB Circular A-87 requirements as follows:

- (a) An employee who works solely on a single cost objective (i.e., a single Federal program whose funds have not been consolidated) must furnish a semi-annual certification that he/she has been engaged solely in activities supported by the applicable source.

(b) An employee who works on multiple activities or cost objectives (i.e., in part on a federal program whose funds have not been consolidated in a consolidated Schoolwide pool) must maintain time and effort distribution records in accordance with OMB Circular A-87, Attachment B, paragraph 8.h(4), (5) and (6). The employee must document the portion of time and effort dedicated to:

- (1) The federal program; and
- (2) Each program or other cost objective supported by either consolidated Federal funds or other revenue sources.

5. How can a Schoolwide program demonstrate that it supplements, and does not supplant, state and local funds?

In a Schoolwide program, Title I, Part A funds and other federal education program funds may be used only to supplement the total amount of funds that would, in the absence of 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.

It is generally an LEA's responsibility, and not buildings, to ensure that the "supplement not supplant" requirement is met and that a Schoolwide program school receives all the State and local funds it would receive were it not a Title I Schoolwide program school. In other words, an LEA may not reduce its allocation of state and local funds and resources to a Schoolwide program school because the school receives federal funds to operate a Schoolwide program. An LEA should be able to demonstrate, through its regular procedures for distributing funds and resources, that it distributes state and local funds fairly and equitably to all its schools—including Schoolwide program schools—without regard to whether those schools are receiving federal education funds.

Program Evaluation/Annual Review

6. Should planning be a continuous activity even after the initial planning year?

Title I regulations require that a school operating a Schoolwide program annually evaluate the implementation of, and results achieved by, the Schoolwide program. This evaluation must determine whether the Schoolwide program was effective in increasing the achievement of students in meeting the State's academic standards, particularly those students who had been furthest from achieving the standards. The school must revise its plan as necessary based on the results of the evaluation to ensure the continuous improvement of student achievement.

Record Keeping

7. What specific documentation must a school maintain regarding operation of its Schoolwide program?

A school must retain documentation related to its three core components: the comprehensive needs assessment, the comprehensive Schoolwide plan, and the evaluation. Documentation relating to the needs assessment should include significant information about the achievement of students and conditions in the school that directly affect their academic achievement.

Documentation relating to the comprehensive Schoolwide plan must contain specific information about how the program will implement the components, how resources will be used, the programs consolidated to support the Schoolwide program and how student assessment results will be disseminated. Documentation relating to the evaluation should include the method of evaluation used, and findings that describe the results achieved by the Schoolwide program and its implementation.

Title I Schoolwide Pool Questions and Answers

A Schoolwide program school may consolidate funds from federal, state, and local sources to implement the school's comprehensive plan to upgrade its entire educational program. 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 Schoolwide program 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. Moreover, the school is not required to maintain separate fiscal accounting records by program that identify the specific activities supported by those particular funds in order to demonstrate that the activities are allowable under the program. Each school, however, must identify the specific programs being consolidated, and the amount each program contributes to the consolidation, and maintain records that demonstrate that the Schoolwide program addresses the intent and purposes of each of the Federal programs whose funds are being consolidated to support the Schoolwide program.

1. Accounting Procedures

The Schoolwide Building Program Fund is optional to those Schoolwide buildings that are eligible. In order to use the Schoolwide Building Program Fund, a school district must have an approved consolidated funding application from the Ohio Department of Education. School districts should use fund number 598 from the Uniform School Accounting System for the program. A special cost center should also be used for each eligible building.

The receipts to the Schoolwide Building Program Fund are transfers from federal grants that are typically accounted for in separate federal grant funds. Initially, school districts are to record the individual federal grant receipts to the appropriate federal grant fund and the portion to be used in the Schoolwide building program should be transferred to the Schoolwide Building Program Fund. Similarly, the program also requires school districts to contribute **all of their state and local funds** to the program using transfers. School districts should appropriate for and record a transfer-out of the contributing grant funds to the Schoolwide Building Program Fund ([Auditor of State Bulletin 2007-003](#)).

To leverage federal funds using a consolidated budget, LEAs should consolidate **all** of the state, local and federal funds in the pool for the participating Schoolwide buildings.

Please note that the LEA must be able to account for and identify the State and Local Special Education funds that were used in any Schoolwide Program within data reported through EMIS. LEAs are required to meet Maintenance of Effort (MoE) in a succeeding year for State and Local Special Education expenditures. Funds used in a Schoolwide Program are eligible to be counted toward MoE.

2. May a Schoolwide program include funds it receives under the Individuals with Disabilities Act (IDEA)?

Yes. Consistent with section 613(a)(2)(D) of the IDEA and 34 CFR 200.29(c)(3), a school that operates as a Schoolwide program may include funds received under Part B of the IDEA. However, the amount of funds included may not exceed the amount received by the LEA under Part B of the 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. A school also may include funds it receives for students with disabilities under section 8003(d) of the ESEA. A school that includes funds under Part B of the IDEA or section 8003(d) of the ESEA may use those funds in its Schoolwide program for any activities under its Schoolwide program plan but must comply with all other requirements of Part B of the IDEA to the same extent as it would if it did not include funds under Part B of the IDEA or section 8003(d) of the ESEA in the Schoolwide program.

3. If Special Education IDEA Part B funds are included in the Schoolwide pool, must state and local funds be included?

Ohio's LEAs **are required** to consolidate funds from federal, state and local sources in their Schoolwide programs. LEAs must include state and local Special Education Funds if IDEA Part B funds are included in the Schoolwide pool.

4. What share of state and local funds should LEAs include in the Schoolwide pool? (The percentage of State and local funds combined with Federal funds.)

State Educational Agencies (SEA) have significant authority to ensure that Schoolwide plans and associated budgets are implemented in accordance with the statute and regulations (Section 1116(b)(3)(E); 34 CFR 20.41). To optimize the use of funds, Ohio's LEAs **ARE REQUIRED** to consolidate funds from federal, state, and local sources in their school Schoolwide programs.

Schoolwide Pool Business Rules:

- (a) Provide that most funds in consolidated (formula) application are eligible.
- (b) The intent and purposes of contributing grants must be met.
- (c) All of the building's state and local funds must be part of the pool.

5. If all the Title I, Part A schools in an LEA operate Schoolwide programs, may the LEA consolidate funds it is required to reserve under Title I, Part A and other federal programs into one district-wide pool?

No. Consolidation of funds in Schoolwide programs applies only to programs at the school building level in accordance with a school's Schoolwide plan. An LEA must still set aside Title I, Part A funds specifically required for homeless children, parental involvement, the ESEA Flexibility Waiver 20 percent requirement, and professional development as required by law and must account for the Title I funds it spends on those activities. The LEA must then allocate the remaining funds to schools in accordance with section 1113 of the ESEA and §200.78 of the Title I regulations.

6. 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?

No. Title I, Part A funds (as well as consolidated Federal funds) must be used to address the *educational* needs of a school identified by the needs assessment and articulated in the comprehensive plan. [Section 1114(a)(1)] They may not be used for non-educational activities such as building maintenance and repairs, landscaping and custodial services.

When Title I, Part A funds are consolidated with state and local funds, they lose their identity; thus, it is impossible to know on what specific activities Part A funds are spent. However, to meet the supplement not supplant requirement as it relates to a Schoolwide program, 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 [Section 1114(a)(2)(B)], 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 such items as building maintenance and repair, landscaping or custodial services, there also must be sufficient state and local funds in that consolidated pool to cover non-educational activities.

Meeting Intent and Purposes

7. How may a school that is operating a Schoolwide program meet the intent and purposes of the programs for which it consolidates funds?

A school that consolidates and uses funds from any other federal education program in a Schoolwide program is not required to meet most statutory or regulatory requirements of the program applicable at the school level, but must meet the intent and purposes of that program to ensure that the needs of the intended beneficiaries are met. The school must be able to demonstrate that its Schoolwide program contains sufficient resources and activities to reasonably address the intent of the included programs, particularly as they relate to the lowest-performing students. [Section 1114(a)(3)(C); 34 CFR 200.29(a) and (b)]. The school is not required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those particular program funds. It must, however, maintain records that demonstrate that the Schoolwide program as a whole addresses the intent and purposes of each of the federal education programs whose funds were consolidated to support it.

The following examples illustrate how a Schoolwide program can meet the intent and purposes of specific federal education programs. An LEA should make similar determinations for all other programs it combines.

Title II, Part A – Preparing, Training and Recruiting High-Quality Teachers and Principals

The intent and purposes of this program are to increase student academic achievement through strategies such as improving teacher and principal quality; increasing the number of highly qualified teachers, principals and assistant principals in schools; and holding LEAs and schools accountable for improvements in student academic achievement. A Schoolwide program may demonstrate that it meets the intent and purposes of this program if the school's

comprehensive plan contains activities and strategies that promote increased student achievement such as helping teachers and the principal(s) become more highly qualified through high-quality professional development; increasing the number of highly qualified teachers in the school through recruitment initiatives; and implementing initiatives designed to promote the retention of highly qualified teachers, such as teacher mentoring and support or other incentives.

IDEA, Part B

To help facilitate the inclusion of students with disabilities, the 1997 Amendments to the IDEA, under Section 613(a)(2)(D) and 34 CFR 300.234(a), provided new flexibility to LEAs. They allow an LEA to use a portion of the funds received under Part B of IDEA for any fiscal year to carry out a Schoolwide program under the ESEA, as long as students with disabilities included in such Schoolwide programs receive special education and related services in accordance with a properly developed Individualized Education Program (IEP), and are afforded all of the rights and services guaranteed to children with disabilities under IDEA.

The intent and purpose of the IDEA is to ensure that all children with disabilities have available to them a free appropriate public education designed to meet their individual needs. A Schoolwide program must demonstrate that it meets the intent and purpose of this program by ensuring that, except as to certain use of funds requirements, all the requirements of the IDEA are met, and that children with disabilities are included in Schoolwide activities.

High-quality professional development required for all staff and designed to result in improved learning outcomes for all children, including children with disabilities, is one example of a Schoolwide activity that meets the intent and purposes of the IDEA. For example, a school may combine IDEA Part B funds with other program funds for professional development activities that support the implementation of a comprehensive student assessment model aligned with student academic content and achievement standards that enables teachers of all core academic subjects to incorporate alternative assessment procedures in the instructional setting to diagnose student achievement and monitor student progress on an ongoing basis. Using this kind of professional development as a way to meet the intent and purposes of the IDEA ensures that all students will benefit, regardless of their special needs.

Record Keeping

8. What fiscal record-keeping requirements apply to an LEA or a school with respect to federal funds that are consolidated in a Schoolwide program?

A school operating a Schoolwide program that consolidates funds from Federal education programs with state and local funds in a consolidated Schoolwide pool is not required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those program funds. The school must, however, maintain records that demonstrate that the Schoolwide program, considered as a whole, addresses the intent and purposes of each of the Federal education programs whose funds were consolidated to support it. [Section 1114(a)(3)(C)]

LEAs must keep track of the amount of funds from a given federal education program that were expended under the single consolidated Schoolwide pool. For example, Title I, Part A has limitations on the amount of funds that may be carried over to the succeeding fiscal year. Similarly, an SEA may want to recoup any unexpended state funds to demonstrate that federal funds in a consolidated Schoolwide pool have been expended.

9. How does an LEA document employee time and effort in schools that operate Schoolwide pooling programs?

A school operating a Schoolwide program consolidates federal, state, and local funds under section 1114(a)(3) 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.