

Coordination and Collaboration among Federal Programs



Florida Association of State and Federal Education
Program Administrators
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SESSION OVERVIEW

- **Provide** examples of how to leverage federal resources
- **Discuss** how schoolwide programs provide opportunities for braiding and blending funds
- **Dispel** common myths regarding use of Title I funds
- **Highlight** how to support key areas of reform with selected federal programs

LEVERAGING RESOURCES

BRAIDED FUNDING

Financial assistance from individual grants to SEAs and LEAs is coordinated; each individual award maintains its program-specific identity but funds are used in a coordinated manner.

BLENDDED FUNDING

Financial assistance from individual grants to SEAs and LEAs is consolidated into one pot and each individual award loses its program-specific identity.

SELECTED FEDERAL PROGRAMS

- **Title I, Part A (Title I)**: Supplemental Federal funds to ensure Title I students have fair, equal, and significant opportunities to obtain a high-quality education and improve their academic achievement.
- **Title II, Part A (Title II)**: Supplemental Federal funds to increase academic achievement by improving teacher and principal quality.
- **Title III**: Supplemental Federal funds to improve the education of English learners by helping them learn English and meet challenging academic achievement standards.

SELECTED FEDERAL PROGRAMS

- **Individuals with Disabilities Education Act (IDEA)**: Supplemental Federal funds to ensure all children with disabilities have a free appropriate public education, in the least restrictive environment, with access to the general curriculum to improve results and achievement for all children with disabilities.
- **Coordinated Early Intervening Services under IDEA (CEIS)**: Funds for coordinated services for K-12 students who are *not* identified as a student with a disability but who need additional academic and behavioral support (may not exceed 15% of an LEA's IDEA, Part B allocation (611 and 619 preschool)).

ALLOWABLE COSTS FOR FEDERAL FUNDS

Please keep in mind that all costs charged to Federal awards must be –

- (1) Allowable.
- (2) Allocable.
- (3) Reasonable.
- (4) Necessary.

See 2 C.F.R. § § 200.403-200.405

SCHOOLWIDE PROGRAMS

SCHOOLWIDE PROGRAMS

A schoolwide program:

- Represents a primary means to coordinate, collaborate, and maximize flexibility in using Federal funds.
- Serves as a vehicle for whole-school reform.
- Allows for easier leveraging of non-Federal and Federal funds to work together to improve educational performance of the entire school.
- Addresses student needs through a schoolwide plan based on a comprehensive needs assessment.

BENEFITS OF A SCHOOLWIDE PROGRAM

Provides for:

- An opportunity to serve all students.
- Services that need not be supplemental.
- Blending Federal, State, and local funds.

IMPLEMENTING A SCHOOLWIDE PROGRAM

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

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

SAFEGUARDING HISTORICALLY UNDERSERVED POPULATIONS

- A comprehensive schoolwide plan must include strategies for —
 - ✓ meeting the educational needs of historically underserved populations.
 - ✓ addressing the needs of all students but particularly the needs of low-achieving students and those at risk of not meeting the State's standards who are members of the target population of any program included in the schoolwide plan.
- A schoolwide program must provide effective, timely additional assistance to students who experience difficulty mastering the State's academic achievement standards.

SAFEGUARDING HISTORICALLY UNDERSERVED POPULATIONS

An LEA operating a schoolwide program must:

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

USING FEDERAL FUNDS TO SUPPLEMENT SCHOOL REFORM

- The supplement not supplant requirement in section 1120A(b) of Title I does not apply to a schoolwide program school.
 - ✓ The presumptions used to determine if supplanting has occurred do not apply to the use of Title I funds in a schoolwide program school.
- However, in order for Federal funds to make a difference in supporting school reform in a schoolwide program, they must supplement the non-Federal funds the school would otherwise receive.
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USING FEDERAL FUNDS TO SUPPLEMENT SCHOOL REFORM

- To ensure that Federal funds have the opportunity to make a difference, a schoolwide program relies on the equitable distribution of non-Federal funds.
- Equitable distribution of non-Federal funds requires that—
 - ✓ A schoolwide program school shall use Title I funds only to supplement the amount of funds that would, in the absence of the Title I funds, be available from non-Federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and English learners.
- This requirement ensures that the Federal funds a schoolwide program school receives do not replace non-Federal funds the school would otherwise receive if it were not operating a schoolwide program.

EXAMPLE #1 OF EQUITABLE DISTRIBUTION

Distribution of non-Federal resources based on characteristics of students

Assume:

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

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

EXAMPLE #1

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

EXAMPLE #2 OF EQUITABLE DISTRIBUTION

Distribution of non-Federal resources based on staffing and supplies

Assume:

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

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

EXAMPLE #2

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

A WORD OF CAUTION...

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

- An LEA does not have sufficient non-Federal funds to provide even the most basic education program in all its schools.

- An LEA is required by State or local law to provide funding for a specific purpose for *all* students.

EXCLUSION OF NON-FEDERAL FUNDS FROM SUPPLANTING DETERMINATIONS

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

- A program meets the intent and purposes of Title I if it either —
 - ✓ Is implemented in a school with at least 40 percent poverty;
 - ✓ Is designed to promote schoolwide reform and upgrade the entire educational operation of the school;
 - ✓ Is designed to meet the educational needs of all students in the school, particularly those who are not meeting State standards; and
 - ✓ Uses the State's assessment system to review the effectiveness of the program;
- OR
- ✓ Serves only students who are failing, or most at risk of failing, to meet State standards;
 - ✓ Provides supplementary services to participating students designed to improve their achievement; and
 - ✓ Uses the State's assessment system to review the effectiveness of the program.

EXAMPLE OF EXCLUSION

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

EXAMPLE OF EXCLUSION

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

EXAMPLE OF EXCLUSION

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

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

BLENDING FUNDS IN A SCHOOLWIDE PROGRAM

BLENDING (CONSOLIDATING) FEDERAL, STATE, AND LOCAL FUNDS

- A school operating a schoolwide program may blend (consolidate) Federal, State, and local funds.
- When a school blends funds, those funds lose their individual identity and the school may use the funds to support any activity of the schoolwide program without regard to which program contributed the specific funds used for a particular activity.
- Each SEA must encourage schools to blend funds in a schoolwide program and must eliminate State fiscal and accounting barriers so that these funds can be more easily blended.

BLENDING FUNDS UNDER PART B OF THE IDEA

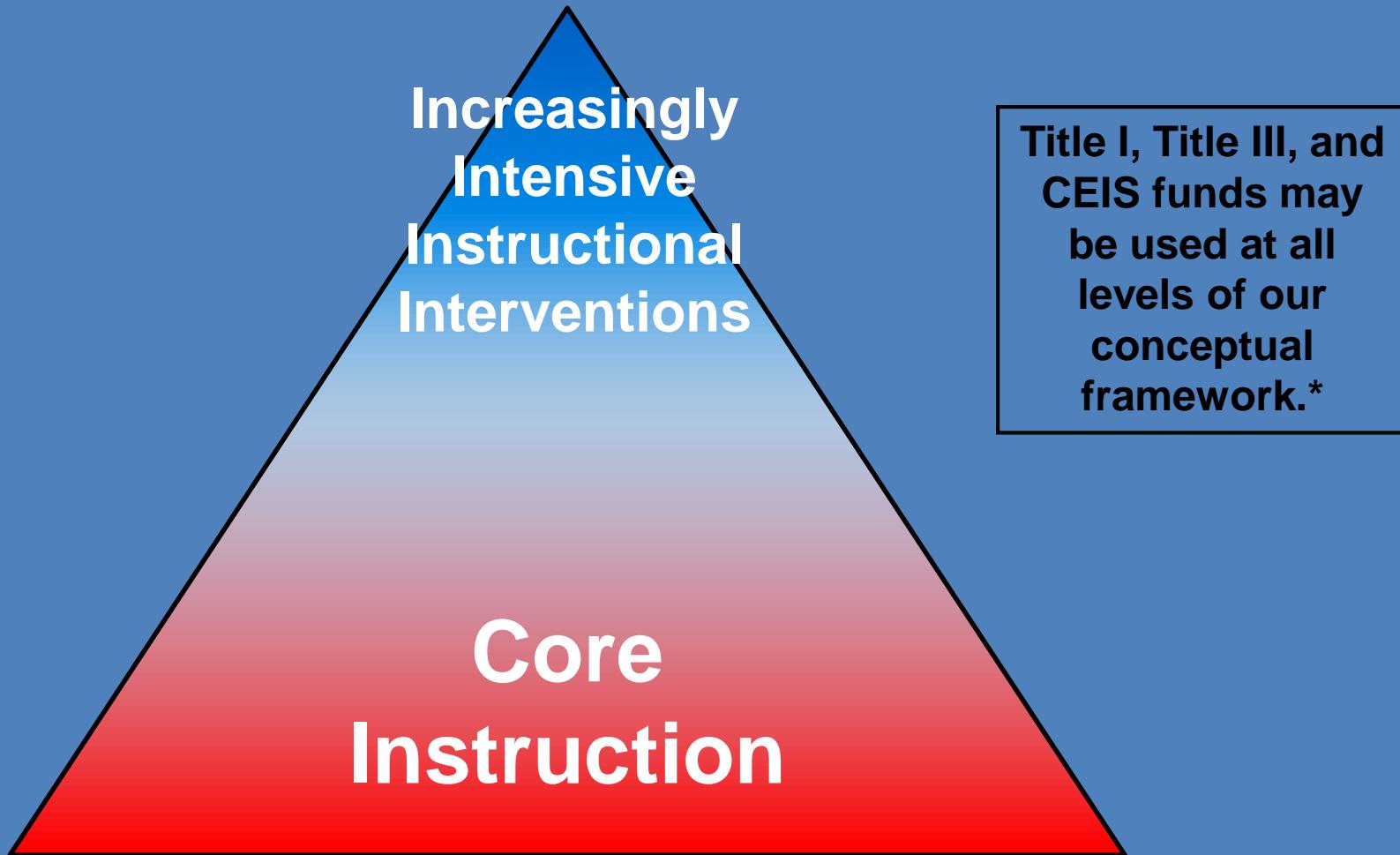
IDEA, Part B funds may be blended in a schoolwide program, with certain conditions:

- The amount of IDEA, Part B funds that may be blended in a schoolwide program is the per-child amount allocated to the LEA times the number of students with disabilities in the school.
- IDEA funds must still be counted as Federal funds for IDEA's excess cost and supplement not supplant calculations.
- Regardless of how IDEA funds are expended, children with disabilities in a schoolwide program school must:
 - ✓ receive services in accordance with a properly developed individualized education program (IEP).
 - ✓ be afforded all of the rights and services guaranteed to children with disabilities and their parents under the IDEA.

ADVANTAGES OF BLENDING FUNDS

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

Using Title I, Title III, and CEIS Funds for RTI in a Title I Schoolwide School that Consolidates Federal Funds



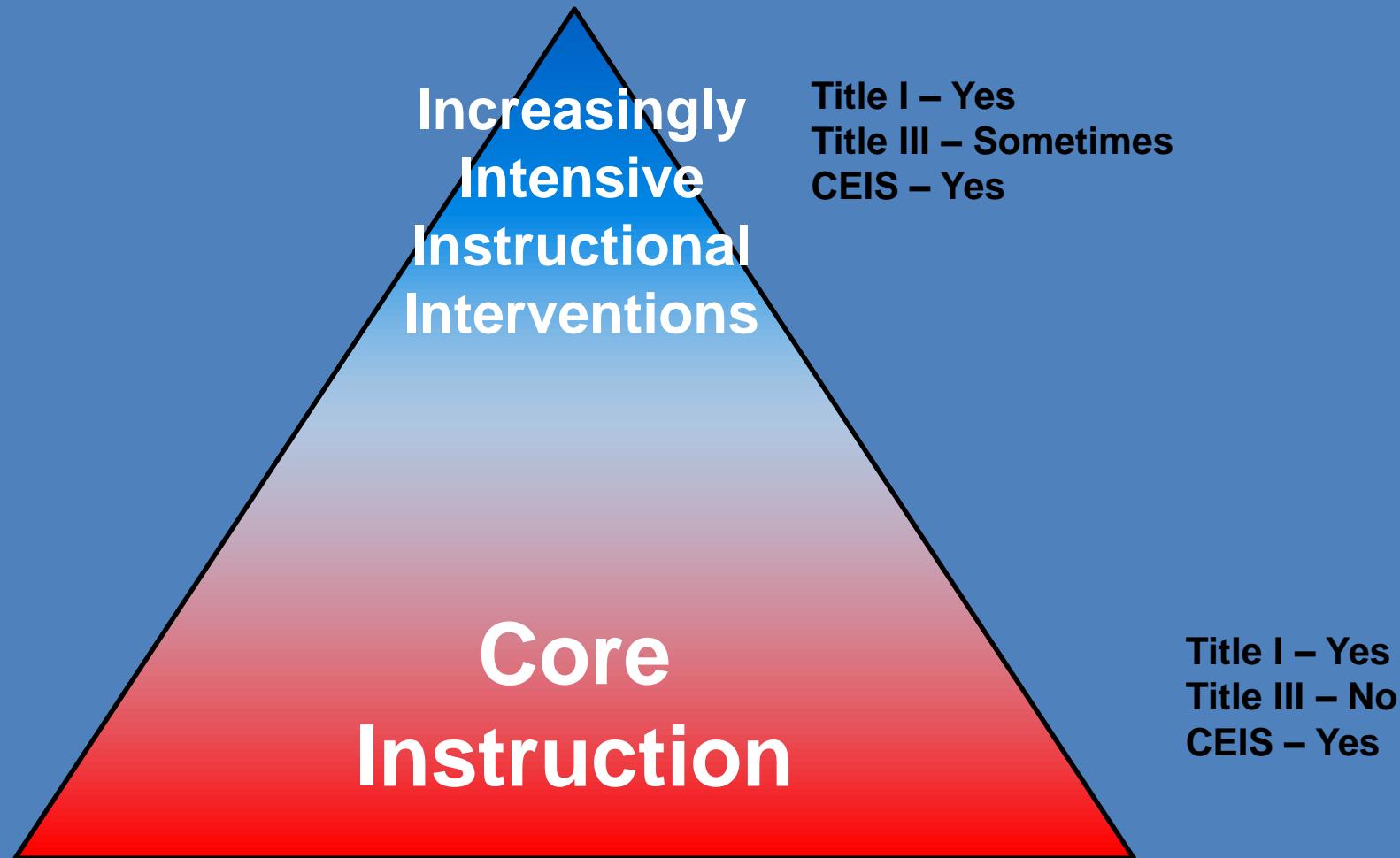
**A schoolwide school must receive all of the non-Federal funds it would otherwise receive if it were not operating a schoolwide program, including those funds necessary to provide services required by law for students with disabilities and LEP students.*

BRAIDING FUNDS IN A SCHOOLWIDE PROGRAM

BRAIDING FEDERAL FUNDS WITH STATE AND LOCAL FUNDS

- Conduct a comprehensive needs assessment of all students in the school.
- Identify the needs of students in the school, particularly the needs of low-achieving students.
 - ✓ Title I funds may be used to meet any needs identified by the comprehensive needs assessment and included in the comprehensive schoolwide plan.
 - ✓ Other Federal funds must be used according to statutory and regulatory requirements – eligible students, allowable costs, reservations, supplement not supplant.
- Include persons responsible for all programs – Federal, State, and local.
- Determine which available funds may be used to meet the identified needs of students in the school.

Using Title I, Title III, and CEIS Funds for RTI in a Title I Schoolwide School that Does Not Consolidate Federal Funds*



**The school must receive the amount of State and local funds it would otherwise receive if it were not a schoolwide school.*

DISPELLING MYTHS REGARDING USE OF TITLE I FUNDS

DISPELLING THE MYTH

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

DISPELLING THE MYTH

Myth	Explanation of Law
Title I funds may only be used to provide remedial instruction.	The purpose of a schoolwide program is to upgrade the entire educational program in the school in order to raise the achievement of the lowest-achieving students. At times, this may be best achieved by preparing low-achieving students to take advanced courses — for example, providing an intensive summer school course designed to accelerate their knowledge and skills, offering an elective course to prepare them to take advanced courses, or providing after-school tutoring while they are taking advanced courses.

DISPELLING THE MYTH

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

DISPELLING THE MYTH

Myth	Explanation of Law
<p>If a school does not consolidate funds, Title I funds may only be used to provide services in a pull-out setting.</p>	<p>A school need not use Title I funds to provide services only in a pull-out setting, although this practice is not prohibited either. Title I funds may be used to upgrade the entire educational program in a school and serve all students, even if the school does not consolidate Title I funds with its other funds. However, the primary purpose of a schoolwide program is to raise the achievement of the lowest-achieving students by upgrading the entire educational program.</p>

DISPELLING THE MYTH

Myth	Explanation of Law
Title I funds may only be used for instruction.	Title I funds may be used for activities and strategies designed to raise the achievement of low-achieving students identified by a school's needs assessment and articulated in the school's comprehensive schoolwide plan. For example, Title I funds may be used to improve attendance, improve school climate, counteract bullying, or provide positive behavioral interventions and supports.

DISPELLING THE MYTH

Myth	Explanation of Law
<p>Title I funds may not be used to support activities that are “required by law,” were previously supported with State or local funds, or are provided to non-Title I students with State or local funds.</p>	<p>A schoolwide program school does not need to demonstrate that Title I funds are used only for activities that supplement, and do not supplant, those the school would otherwise provide with non-Federal funds. Accordingly, the presumptions used to determine if supplanting has occurred (i.e., if the activity is required by law; if the activity was provided in prior years with non-Federal funds; or if the activity is provided to non-Title I students with non-Federal funds) do not apply to uses of Title I funds in a schoolwide program school.</p>

DISPELLING THE MYTH

Myth	Explanation of Law
<p>Title I funds may not be used to support children below kindergarten or the age of compulsory education.</p>	<p>A schoolwide program school may use Title I funds to operate, in whole or in part, a preschool program to improve cognitive, health, and social-emotional outcomes for children below the grade at which the LEA provides a free public elementary education. Such a program is designed to prepare children with the prerequisite skills and dispositions for learning that will enable them to benefit from later school experiences. All preschool children who reside in the school's attendance area are eligible to participate.</p>

AREAS OF REFORM

- College- and Career-Ready (CCR) Standards and Assessments.
- State-Developed Differentiated Recognition, Accountability, and Support.
- Effective Instruction and Leadership.
- Positive School Climate.

A WORD OF CAUTION...

The examples in this presentation illustrate ways that Title I, Title II, Title III, and IDEA funds may be used by SEAs and LEAs to support key areas of reform in a schoolwide program.

Because they are merely examples, however, they do not take into account the specific context in which these funds would be used at the State or local levels.

Thus, an SEA or LEA should ensure that such use is consistent with relevant programmatic requirements.



COLLEGE- AND CAREER-READY STANDARDS AND ASSESSMENTS

An SEA may:

- Develop standards and assessments for all students (Title I/Consolidated ESEA State administrative funds, ESEA § 6111).
- Develop appropriate accommodations for children with disabilities and valid and reliable alternate assessments to assess their performance (IDEA, Title I/Consolidated ESEA State administrative funds, § 6111, EAG funds).
- Support capacity-building activities and improve the delivery of services by LEAs to ensure access to CCR standards for children with disabilities (IDEA).

COLLEGE- AND CAREER-READY STANDARDS AND ASSESSMENTS

An SEA may:

- Provide professional development to implement CCR standards and assessments (§ 6111).
- Provide professional development to support all teachers and leaders in learning core content and new instructional strategies to implement CCR standards (Title II).

COLLEGE- AND CAREER-READY STANDARDS AND ASSESSMENTS

An LEA may:

- Support all teachers and leaders in learning core content and new instructional strategies to implement CCR standards (Title II).
- Prepare low-achieving students to participate successfully in advanced coursework aligned with CCR standards (Title I).
- Provide intensive summer programs to low-achieving high school students to prepare them to take advanced classes (Title I).

DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

An SEA may:

- Provide technical assistance to low-performing schools and LEAs (Title I State administrative funds).
- Provide technical assistance to personnel, and direct services to children with disabilities, in schools and LEAs identified for improvement based solely on the low performance of students with disabilities, including relevant focus schools (IDEA).
- Use the school improvement reservation for their State system of support and establish eligibility criteria to determine the schools that receive this support and the amount of funds (Title I, § 1003(a)).

DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

An LEA may:

- Blend funds in a schoolwide school to turn around low-performing schools (IDEA, Title I, and Title II), or
- If funds are not blended, encourage a schoolwide program to use Title I funds on comprehensive reforms designed to improve the school, consistent with its needs as identified in the schoolwide plan, rather than just on specific services for individual low-achieving students (e.g., pull-out programs).

DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

An LEA may focus funds where the needs are greatest by:

- Reserving funds for LEA support to low-performing schools (Title I).
- Allocating more funds per low-income student to schools with higher poverty rates (Title I).
- After allocating to schools above 75 percent poverty, deciding whether to allocate funds to elementary, middle, or high schools (Title I).

DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

An LEA may:

- Provide incentives and rewards to attract qualified and effective teachers to low-performing schools (Title I and Title II).
- Provide educators with professional development, and materials and supplies, to implement the schoolwide plan (IDEA, Title I, and Title II).

EFFECTIVE INSTRUCTION AND LEADERSHIP

An SEA may:

- Train evaluators (Title II).
- Develop, or help LEAs develop, performance-based compensation systems that provide differential and bonus pay in high-need schools (Title II).
- Provide professional development:
 - ✓ To teachers and related services providers of students with disabilities (IDEA).
 - ✓ To assist teachers in using educator evaluation data to improve instruction (Title II).
 - ✓ On how teacher effectiveness will be measured (Title II).

EFFECTIVE INSTRUCTION AND LEADERSHIP

An LEA may:

- Provide professional development to teachers as part of carrying out the schoolwide plan (Title I and Title II).
- Develop and implement services for students in need of additional academic or behavioral support, including professional development (IDEA/CEIS and Title I).
- Recruit and retain effective and highly-qualified teachers using differential pay (Title I and Title II).
- Provide monetary incentives associated with earning high educator effectiveness ratings (Title I and Title II).

SCHOOL CLIMATE

An SEA may use State-level activity funds for a State-wide initiative to assist districts in providing positive behavioral supports (IDEA).

SCHOOL CLIMATE

An LEA may:

- Permit a schoolwide program to implement activities to improve school climate, provided that climate-focused interventions are part of the schoolwide plan (Title I).
- Implement behavioral evaluations and interventions for students who need additional academic and behavioral support (IDEA/CEIS and Title I).

SCHOOLWIDE PROGRAM

EXAMPLE

Depending on its needs, a schoolwide program school could:

- Upgrade the curriculum for the entire school.
- Implement an early warning system.
- Extend the school day or school year.
- Reorganize class schedules to increase teacher planning time.
- Revamp the school's discipline process.
- Hire additional teachers.
- Reorganize classes to promote personalized learning.
- Implement career academies.
- Implement school safety programs.

SCHOOLWIDE PROGRAM

EXAMPLE (CONT.)

- Train evaluators as part of a teacher and leader evaluation system.
- Provide incentives to attract highly qualified and effective teachers to a low-performing school.
- Provide professional development on CCR instructional strategies to teachers and related services providers of students with disabilities.
- Implement positive behavioral interventions and supports schoolwide.

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