

Re-Examining the Schoolwide Program Model: Unlocking its Potential for Students and Federal Clarifications

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Agenda

- Schoolwide programmatic possibilities
- Common confusions
- Discussion of the supplemental funds test
 - What's the confusion?
 - How does this affect schools?
 - Available resources: federal and other
- What are the things to think about in developing state-specific (or district) guidance on this topic?
- What are the next steps for your state/district?

Why Re-examine Schoolwide?

- The schoolwide program model is a powerful school improvement tool, but is **rarely implemented to its full potential** because of confusion over “supplement not supplant”
- Federal law sets **a different test for schoolwide program schools**, but it is rarely applied
- Implementing a different test could **significantly change** how schools and districts spend Title I funds, and how states oversee spending, so state, district and school staff will need **guidance and support**

Taking a step back, what could schoolwide look like?

- Depending on its needs, a schoolwide program school could spend Title I to:
 - Implement a stronger curriculum
 - 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

Why doesn't schoolwide look that way now in many places?

- Title I funds are supposed to **supplement** state and local efforts
- Historically, this has been reviewed **programmatically**, by defining the programs and services school districts will deliver with state and local funds
- Under this approach, Title I funds are **limited** to separate add-on services

Why doesn't schoolwide look that way now in many places? (cont'd)

- Confusion over “consolidation”
- Common misperception is that schools must “consolidate” their Title I funds with other federal, state, and local funds in order to implement a more flexible schoolwide program. This is not true.
- **Title I funds may be spent flexibly in a schoolwide program regardless of whether the school consolidates funds or not.**

Why doesn't schoolwide look that way now in many places? (cont'd)

- Consolidation permits schools to spend *non-Title I funds* flexibly, but does not affect how a school may use its Title I funds (See Title I fiscal guidance below E-7, as well as B-17 of ESEA Flex FAQs: <http://www.ed.gov/sites/default/files/esea-flexibility-faqs.doc>):
 - “For example, a school operating a schoolwide program has flexibility with respect to how it accounts for the time and effort of staff supported with Federal funds, particularly if the school consolidates all its funds in a single pool. The school would also have additional flexibility in its use and reporting of Title I, Part A funds, even absent consolidation, and of Federal funds that it consolidates.”
- More information about “consolidating” funds generally is available in the U.S. Department of Education’s Title I Fiscal Guidance at: www.ed.gov/programs/titleiparta/fiscalguid.doc.

What is different in schoolwide?

- The Title I statute takes a **different approach** in schoolwides to supplanting

Instead of making sure Title I delivers “extra” programs and services . . .

. . . look at **the amount of state and local money** a schoolwide school receives to make sure it receives all the money it would get if it did not also receive federal funds

- The goal is to make sure Title I schools, in the aggregate, get extra money – they then have flexibility in how they spend their money

Section 1114 of the Elementary and Secondary Education Act

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).

SUPPLEMENTAL FUNDS. —

A school participating in a schoolwide program shall use [Title I] funds available only to supplement the amount of funds that would, in the absence of [Title I funds], 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.

Supplemental Funds Test

- Schools do not have to show a specific service or cost is “extra.”
- Instead, to show that Title I funds are supplemental, a school district needs to demonstrate that its Title I schoolwide schools were not denied access to state and local funds simply because they received Title I funds.
- In short, a district must be able to show its **method for allocating state and local funds is neutral with regard to Title I funds and does not reduce state and local allocations** in light of Title I funds.

Simple Example

If School A would normally receive \$1,000,000 of state and local funds under the school district's regular allocation procedures, the district could not reduce School A's state and local allocation because it also receives Title I funds.

For example, if the school receives \$200,000 of Title I funds, reducing the school's state and local allocation by \$200,000 to \$800,000 would violate the "supplemental funds" test.

Example 1

There are many different ways school districts allocate state and local money to schools. Here is an example of how the supplemental funds test might work in a district that allocates money based on staffing and supply assumptions.⁸

This is a simplified example and is for illustration purposes only.

Assume funds are allocated using the following assumptions:

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

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

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

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

A district would violate the supplemental funds test, for example, if it gave Title I schools only \$15 per pupil for technology, or increased the teacher/student ratio allocation to 30 to 1 because it could fund some teachers with Title I funds.

Example 2

Here is another example based on a weighted student per-pupil allocation. Assume the allocation works on the following assumptions (again, these are simplified numbers for illustration purposes only):

- 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 total, including 250 low-income students, 100 English Language Learners, and 50 special education students, the school would be expected to receive \$2,770,000 in state/local funds based on the following calculation:

Calculation	Category	Amount
500 x \$5,000	Base funding amount for 500 students	\$2,500,000
250 x \$500	Funding based on additional allocation for 250 students that are low-income/at-risk	\$125,000
100 x \$700	Funding based on additional allocation for 100 students that are English Language Learners	\$70,000
50 x \$1,500	Funding based on additional allocation for 50 students served by special education	\$75,000
		\$2,770,000.00

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

A district would violate the 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.

More Examples

- Mass Insight publication: “The Money You Don’t Know You Have for School Turnaround: Maximizing the Title I Schoolwide Model”
 - http://www.massinsight.org/publications/stg-resources/240/file/1/pubs/2013/07/12/FedEd_SDN_supplemental_funds_toolkit_FINAL_7_11_13.pdf

Recent Federal Statements

- Guidance document issued at CCSSO in March (and recently distributed on 9/13/13 by Monique Chism more broadly):
 - http://www.doe.k12.de.us/infosuites/staff/fedstprog/TitleIPartA/Files/Home%20Page/Schoolwide/FlexibilitySWP_09-13-13.pdf
- Chism/Rigling CCSSO presentation, stating test in a schoolwide is a “funds test”:
 - Webinar: http://www.ccsso.org/Resources/Digital_Resources/Local_and_State_Flexibility_to_Use_Federal_Funding_for_College_and_Career_Ready_Standards_Implementation.html
 - Slides: http://www.ccsso.org/Documents/CCSSO_Presentation_071713_webinar_versionf.pptx

So what is the control to ensure Title I funds are spent responsibly?

- All costs charged to Title I in a schoolwide program must be:
 - Consistent with the school's needs
 - Reasonably designed to improve student outcomes
 - Necessary and reasonable

Teeing up the next steps

- Getting schools to schoolwide status:
 - Issue guidance about the supplemental funds test and how that affects the use of funds in a schoolwide? (This is tricky for districts in states that have not moved on this.)
 - What about needs assessment/planning?
 - Many states already have guidance on these issues
 - If so, will this be incorporated into the existing guidance, or will it be a standalone document?
 - If not, will the state develop such guidance?

Next steps (cont.)

- State oversight:
 - What do these changes mean for how the state will oversee school-level planning and spending?
 - What's the best way to balance oversight responsibilities, burden, and effective administration
 - Increased oversight at the front end (using the application process)?
 - Using existing process to help monitor fed rules (reimbursement, financial reports, etc.)?
 - Revamp back-end monitoring?

Next steps (cont.)

- Supplemental funds test:
 - What might this test look like in your state/district?
 - What concerns might people have over this guidance?
 - What would be the best way to address those concerns?

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