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October 8, 2013

TO: Chief School Administrators
Charter School Lead Persons

FROM: Karen L. Campbell, Director
Office of Title I

SUBJECT: Title I Schoolwide Programs

As the percentage of Title I schools operating schoolwide programs increases across the nation and in New Jersey, the New Jersey Department of Education (NJDOE) encourages districts with schoolwide programs, authorized under Section 1114 of the Elementary and Secondary Education Act (*ESEA*), to maximize the use of their federal funds to support the implementation of educator and leadership evaluation systems, college- and career-ready standards, and strategies to ensure a positive school climate. Inherent in the schoolwide approach is increased flexibility for schools to use Title I funds in ways that are not allowable in a Title I targeted assistance program. Still, there are statutory and regulatory requirements to which districts must adhere. To assist you in successfully fulfilling these requirements, they are highlighted below:

I. Purpose:

Federal regulations indicate that, “[t]he 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 . . .” (34 CFR 200.25) In schools with high percentages of poverty, operating a Title I schoolwide program enables the school to incorporate reform strategies into its overall instructional program to improve the academic achievement of the lowest-performing students while upgrading the educational program of the entire school. Operating a schoolwide program does not result in schools receiving additional Title I funds, but it does enable schools to use their Title I funds more flexibly than is permitted in targeted assistance programs. Still, schoolwide programs must meet all the intents and purposes of the Title I legislation.

II. Comprehensive Needs Assessment

Schoolwide programs are created based on the active engagement of teachers, administrators, families, community members and students, if age appropriate. The process begins with each school annually conducting a comprehensive needs assessment. The needs assessment process is an ongoing one that should occur throughout the year with the input of all relevant stakeholders. To gain and retain approval to operate a Title I schoolwide program, schools must document the engagement of stakeholders in the ongoing comprehensive needs assessment process. This is a federal requirement.

The comprehensive needs assessment is the school's mechanism to identify the academic and non-academic needs of students, the content and skills deficiencies of teachers, and the programs and services needed to address identified achievement gaps. In essence, the comprehensive needs assessment is the foundation of the schoolwide program.

III. Schoolwide Plan

Schoolwide programs are required to use the outcomes of their comprehensive needs assessment to develop a schoolwide plan that is updated annually and developed in collaboration with their stakeholder groups. Schools are responsible to maintain evidence of annually convening their stakeholder groups to develop their schoolwide program plans. The district must upload all schoolwide program plans to its *ESEA/NCLB* Consolidated Application in the Electronic Web-Enabled Grant (EWEG) system. The Office of Title I will review plans on a rotating basis to ensure consistency with federal requirements for schoolwide programs. Schools that do not submit an updated plan that meets the legislative and regulatory requirements will jeopardize their approval to operate a schoolwide program.

IV. Supplement Not Supplant

While programs and services in schoolwide programs do not have to be supplemental, the Title I funds used to support the program must be supplemental. Thus, the district cannot reduce the level of schools' state/local funding based on an increased Title I allocation. The amount of state/local funding to schools must be sufficient to support the school's basic educational program. Districts are responsible to maintain documentation that Title I funds are used to supplement the state/local funds that are used to support the schools and that schools have enough state/local funds to fully operate without federal funds. For each of its schoolwide programs, districts must have a mechanism to isolate the state/local funds needed for each school to operate in the current year and prior years.

V. Necessary and Reasonable Standard

Title I funds used to support the schoolwide plan may only be for expenditures that are necessary and reasonable to achieve the legislative and regulatory requirements as articulated in the schoolwide plan. The OMB Circular A-87 (http://www.whitehouse.gov/omb/circulars_a087_2004#c) clarifies that, "[t]o be allowable under Federal awards, costs must . . . [b]e necessary and reasonable for proper and efficient performance and administration of Federal awards." Thus, the use of Title I funds for activities and interventions that are not included in the schoolwide plan are not allowable, and are therefore subject to recovery.

The Department is prepared to assist you in establishing schoolwide programs that take advantage of the flexibility permitted while complying with the federal requirements. If you have any questions about operation of your district's Title I schoolwide program(s), or any information provided in the memo, please contact the Office of Title I at 609-943-4283 or titleone@doe.state.nj.us.

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