BULLETIN NO. 04-08

TO: School District Superintendents

School District Title I, Part A Directors

FROM: Gina Hopper, Division Administrator, Grants and Programs

RE: Schoolwide Programs and Targeted Assistance School Programs

CONTACT: Dana Kinley, Principal Consultant (217-524-4832) (dkinley@isbe.net)

The No Child Left Behind Act (NCLB) of 2001 authorizes two distinct program structures under Title I, Part A. They are targeted assistance school programs and schoolwide programs. This e-bulletin focuses on defining the two types of school-based programs and serves as a refresher on the requirements to operate each type of program. Additional resources are provided herein for those school officials considering the implementation of schoolwide programs. The following topics are included in this publication:

Topics
1. Similarities and Differences Between Targeted Assistance School Programs and Schoolwide Programs
2. Requirements to Implement a Schoolwide Program
3. Process to Become a Schoolwide Program
4. Continuation Requirements for Operating a Schoolwide Program
5. Benefits of Operating a Schoolwide Program
6. Explanation of the Illinois State Board of Education’s (ISBE) Role
7. Supporting Resources
8. At-A-Glance Components of Targeted Assistance School Programs
9. At-A-Glance Components of Schoolwide Programs
10. Program Crosswalk of Required Components

RESOURCES
- No Child Left Behind Legislation – Section III4 – Schoolwide Programs:
  http://www.ed.gov/policy/elsec/leg/esea02/pg2.html#sec1114
- No Child Left Behind Legislation – Section III5 – Targeted Assistance Schools:
  http://www.ed.gov/policy/elsec/leg/esea02/pg2.html#sec1115
- Designing Schoolwide Programs – U.S. Department of Education – Non-Regulatory Guidance, March 2006:
- Title I Fiscal Issues - U.S. Department of Education – Non-Regulatory Guidance, February 2008:
- Federal Register / Vol. 69, No. 127 / Friday, July 2, 2004 / Notices / U.S. Department of Education: Notice Authorizing Schoolwide Programs to Consolidate Federal Education Funds and Exempting Them from Complying with Statutory or Regulatory Provisions of Those Programs
SIMILARITIES BETWEEN PROGRAMS
The goal of both targeted assistance school programs and schoolwide programs is to improve teaching and learning to enable participating students to, at a minimum, meet the Illinois Learning Standards. In accomplishing this goal, both programs:

1. Must be identified through the NCLB Consolidated Application targeting process as eligible to receive Title I, Part A funds.
2. Must use effective methods and instructional strategies for improving achievement of participating children.
3. Must coordinate with and support the regular education program.
4. Must provide instruction by highly-qualified teachers.
5. Must implement strategies to increase parental involvement.
6. Must be used to supplement educational services and not supplant those funds that would, in the absence of Title I funds, be made available from non-Federal sources for the school.
7. May provide services to children who are:
   • not older than age 21 who are entitled to a free public education through grade 12, and/or
   • not yet at a grade level where the local educational agency (LEA) provides free public education.

DIFFERENCES BETWEEN PROGRAMS

**Title I Targeted Assistance School Programs**

1. A targeted assistance school program is one that receives Title I, Part A funds, yet is ineligible or has chosen not to operate a schoolwide program, and provides supplemental educational services to eligible children identified as having the greatest need for special assistance.
2. Just as the term "targeted assistance" signifies, a targeted assistance school program is designed to use Title I funds to provide educational services only to a select group of children identified for failing, or most at risk for failing, to meet the Illinois Learning Standards.
3. In a targeted assistance school program, staff uses multiple measures (more than one) of student academic achievement to determine which students are eligible to participate in the program.
   A. Children in grades 3 and above must be assessed for eligibility using multiple educationally related, objective criteria established by the LEA.
   B. Children from preschool through grade 2 must be selected using criteria such as teacher judgment, interviews with parents, and developmentally appropriate measures.
4. In a targeted assistance school program, the same selection criteria used to identify eligibility for participation and receipt of services under Part A must be applied equitably to children who are economically disadvantaged, have disabilities, are migrant, or have limited English proficiency.
5. Although Title I, Part A funds may not be used to provide services that are otherwise provided by law for the children mentioned above, funds can be used to coordinate or supplement such services.
6. In a targeted assistance school program, Title I funds may be used to employ staff who serve only those students who have been identified as eligible for participation by being the most at-risk of not meeting the Illinois Learning Standards.
7. Records must be maintained documenting that Part A funds are spent on activities and services for only Part A eligible and participating students.

**Title I Schoolwide Programs**

1. A Title I schoolwide program is a comprehensive reform model used to upgrade the entire educational program in a Title I school.
2. A schoolwide program has the primary goal of ensuring that all students, particularly those who are low-achieving, demonstrate at least proficient levels of achievement of the Illinois Learning Standards.
3. A schoolwide program permits a school to consolidate funds from Title I, Part A and other Federal education program funds and resources administered by the U.S. Department of Education to improve the entire educational program of the school with the intended purpose of raising academic achievement for all the students.
4. A schoolwide program uses Title I funds to meet the needs of all students in the school, as determined through a comprehensive needs assessment. Individual students are not identified as eligible to participate.
5. No distinctions are made between staff members paid with Title I funds and staffers who are not.
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.

6. Consolidated funds may be used to pay for pre-kindergarten programs for children under six years of age.

REQUIREMENTS TO IMPLEMENT A SCHOOLWIDE PROGRAM
Each school, within the LEA, authorized to operate with schoolwide authority must have documentation to demonstrate the following criteria have been met prior to or upon initial implementation:

1. At least 40% of the students enrolled in the school, or residing in the attendance area served by the school, are from low-income families. The following are acceptable determinants of poverty:
   A. Current Income Eligibility Guidelines published by the U.S. Department of Agriculture for its National School Lunch and School Breakfast Program (i.e. Free & Reduced Lunch Count)
   B. Temporary Assistance for Needy Families (TANF)
   C. Medicaid

2. The year planning period has been completed. 
   Note: waiver contingency available pursuant to NCLB Section 1114(b)(2)(B)(i)(I) and (II).

3. A comprehensive plan has been developed in consultation with the LEA and the school support team or other technical assistance provider for reforming the entire instructional program in the school. Parents and other stakeholders including community members, teachers, principals, administrators, and if appropriate, pupil services personnel, technical assistance providers, school staff, and students (if the plan is for a secondary school), must be involved in the plan development.
   Note: According to the U.S. Department of Education, Designing Schoolwide Programs, Non-Regulatory Guidance, March 2006, Appendix I – Eligibility/Poverty Determinations, if a school’s poverty threshold falls below 40% in any subsequent year after implementation, it may continue to operate with schoolwide authority.

PROCESS TO BECOME A SCHOOLWIDE PROGRAM

Notify ISBE of Intent to Plan a Schoolwide Program
Contact Dana Kinley, Principal Consultant, by e-mail at dkinley@isbe.net or by phone at 217-524-4832 to request information and/or communicate intent to begin one year planning phase. Beginning with the 2009-2010 school year, local school officials will be provided with standard forms from ISBE for submission of intent to plan a schoolwide program and intent to implement a schoolwide plan. For now, however, a simple contact to Ms. Kinley is all that is necessary to begin the required one-year planning process.

Compose The Comprehensive Plan
1. Describe how the school will implement the ten (10) required components outlined below,
2. Describe how the school will use resources from other sources to implement the ten (10) required components,
3. Include a list of State educational agency (i.e. Illinois State Board of Education) and LEA programs and other Federal programs that will be consolidated to support the schoolwide program, and
   Note: Federal funds listed in accordance with this criterion are restricted to those administered by the U.S. Secretary of Education, U.S. Department of Education and does not include the National School Lunch and School Breakfast Program which is administered by the U.S. Department of Agriculture.
4. Describe how the school will provide individual student academic assessment results in a language the parents can understand, including an interpretation of those results, to the parents of children who take the Illinois Standards Achievement Test (ISAT) or the Prairie State Achievement Examination (PSAE).
   Note: Schools authorized to operate with schoolwide authority on the day before the date of the enactment of NCLB, or in other words, grandfathered programs, are required to amend their plans to meet these criteria.

Get Local School Board of Education Approval
Each comprehensive schoolwide plan must be officially approved by local board of education prior to implementation. By statute, only the local board of education has the authority to approve schoolwide plans.
CONTINUATION REQUIREMENTS FOR OPERATING A SCHOOLWIDE PROGRAM

Maintain Documentation
A school must retain documentation related to three core components:
1. Comprehensive needs assessment.
2. Comprehensive schoolwide plan approved by local board of education.
3. Annual evaluation of program effectiveness.

Fulfill Program Requirements
Schools operating with schoolwide authority must:
1. Maintain the intent and purpose of each of the Federal programs that was consolidated in an effort to support the schoolwide program.
2. Uphold requirements relating to health, safety, civil rights, student and parental participation and involvement, services to private school children, maintenance of effort, and comparability of services.
3. Use Title I funds to supplement educational services and not supplant those funds that would, in the absence of Title I funds, be made available from non-Federal sources for the school. Funds that would normally flow to the school from non-Federal sources must continue to be provided to the school.
4. Conduct an annual evaluation of 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 Illinois Learning Standards, particularly those students who had been furthest from achieving the standards.
5. Review and revise the plan as necessary based on the results of the evaluation to ensure continuous improvement in student achievement.
6. Although statute does not require schools to annually seek the local school board of education’s approval of the program evaluation and/or revised plan after the initial plan approval, a practical way of securing necessary documentation for future monitoring and auditing purposes is to submit the annual evaluation and/or revised plan for inclusion into the local board of education’s official record of regular meeting minutes. This action is not required by ISBE and is completely at the discretion of the local school district.
7. Make the plan available to the LEA, parents, and the general public. To the extent practicable, the information contained in the plan must be understandable to parents and other constituents including publication in an understandable language.
8. Coordinate with Reading First, Early Reading First, Even Start, Carl D. Perkins Vocational and Technical Education Act of 1998, and the Head Start Act if appropriate. In addition to program coordination, funds from each of these federal programs, with the exception of Reading First (K-3), are eligible for consolidation. Because Reading First (K-3) is a competitive grant through the State educational agency, funds are not eligible for consolidation. Early Reading First funds, however, are administered directly between the U.S. Department of Education and the LEA and are eligible for consolidation.

BENEFITS OF OPERATING A SCHOOLWIDE PROGRAM
Greater flexibility is afforded to schools operating with schoolwide authority. They have the flexibility to consolidate resources, serve all students, and redesign the school and its services for the intended purpose of improving student achievement.

All Students are Eligible to Participate in Schoolwide Programs
Schools operating with schoolwide authority do not have to identify particular children as eligible for services. Rather, all students enrolled in the building are eligible to receive the services provided with Title I, Part A funds including direct instruction from staff paid with Title funds. No documentation is required to show that Part A funds are paying for supplemental services for those students that would otherwise not be eligible. For reporting purposes in ISBE’s Student Information System, school officials should identify every student as a participant in Title I, Part A in schools operating with schoolwide authority.

Permits Flexibility to Combine Other Federal Funds in Support of the Schoolwide Program
Schools operating with schoolwide authority have greater latitude in determining how to spend their Title I, Part A funds. Schoolwide programs may use, in addition to Title I, Part A, funds from most other Federal education programs to upgrade the entire educational program. For the purpose of fund consolidation, only those Federal
funds that are administered by the U.S. Secretary of Education from the Department of Education are eligible. For example, funds from the Carl D. Perkins Vocational and Technical Education Act of 1998, which are administered by the U.S. Department of Education, are eligible for consolidation. To the contrary, funds from the National School Lunch and School Breakfast Program are not eligible for consolidation because they are administered by the U.S. Department of Agriculture.

Schoolwide programs that include other Federal programs administered by the U.S. Department of Education do not have to conform to the specific statutory or regulatory requirements of each separate program as long as the intent and purpose of those programs is maintained. Schoolwide programs are not, however, exempt from requirements relating to such critical areas as health, safety, civil rights, student and parental participation and involvement, services to private school children, maintenance of effort, and comparability of services.

The involvement of all staff, parents, and other pertinent stakeholders from the community in the comprehensive planning phase for a schoolwide program will help ensure that the program is designed to meet the learning needs of all of the school's students.

**Provides Flexibility in Spending Title I Funds**

Schoolwide programs can use their Title I, Part A funds in the manner they choose, as long as they engage in reform strategies that increase the amount and quality of learning time and provide a high-quality curriculum to help all children meet the Illinois Learning Standards. The effort to accomplish this must be clearly articulated in the comprehensive schoolwide plan. See example at the end of this document of the flexibility afforded to schools operating with schoolwide authority.

**Focus on Results**

Accountability for results is shared throughout the school. All students are expected to meet the same challenging standards (i.e. Illinois Learning Standards), and all staff are expected to contribute to improving student achievement.

In addition to having greater flexibility in budgeting funds, schools operating with schoolwide authority are also exempt from demonstrating compliance with all of the separate requirements of each of the consolidated programs. As long as the school meets the intent and purpose of each of the programs that is listed as consolidated in its comprehensive schoolwide plan, it is demonstrating compliance. The schoolwide plan must contain sufficient activities to reasonably address the needs of the intended beneficiaries of those programs that were identified through the comprehensive needs assessment. Ultimately, the evaluation of the schoolwide program's effectiveness will demonstrate whether the needs of the intended beneficiaries are being met by the many programs' resources.

**EXPLANATION OF THE ILLINOIS STATE BOARD OF EDUCATION'S ROLE**

With specific regard to schoolwide programs, ISBE’s role is limited to providing technical assistance and monitoring for compliance. ISBE staff does not approve final schoolwide plans. By statute, this official action is reserved for the local school board of education.

In addition to providing technical assistance, ISBE staff also approves annual NCLB Consolidated Applications that include activities and services for schoolwide programs and ascertains compliance for allowable expenditures. Currently ISBE does not offer a standard template for schoolwide plans, and therefore, schools may format plans as desired as long as they are published in a format understandable to parents and other constituents. Based on the common plan requirements for both the school improvement plan and the schoolwide plan, ISBE staff is presently working to develop a schoolwide plan template that is embedded in the school improvement plan currently available on the Interactive Illinois Report Card (IIRC) site. Information will be forthcoming as this project progresses.
At-A-Glance Components of Targeted Assistance School Programs

Title I, Part A has the primary goal of enabling participating children to meet the Illinois Learning Standards. To meet this goal, Section 1115(c) of the NCLB Act of 2001 requires that each targeted assistance school program includes the following eight (8) components that research suggests are essential to high-quality programs. Each targeted assistance school program shall:

1. Use Part A resources to help participating children meet the Illinois Learning Standards that are expected for all children.

2. Ensure that planning for participating students is incorporated into existing school planning.

3. Use effective methods and instructional strategies that are based on scientifically based research that strengthens the core academic program of the school and that:
   - give primary consideration to providing extended learning time, such as an extended school year, before-and after-school, and summer programs and opportunities,
   - help provide an accelerated, high-quality curriculum, including applied learning, and
   - minimize removing children from the regular classroom during regular school hours for instruction.

4. Coordinate with and support the regular education program, which may include services to assist preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or State-run preschool programs to elementary school programs.

5. Provide instruction by highly qualified teachers.

6. Provide opportunities for professional development with resources provided under this part, and, to the extent practicable, from other sources, for teachers, principals, and paraprofessional, including, if appropriate, pupil services personnel, parents, and other staff, who work with participating children in targeted assistance programs or in the regular education program.

7. Provide strategies to increase parental involvement such as family literacy services.

8. Coordinate and integrate Federal, State, and local services and programs, including programs supported under the NCLB Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.
At-A-Glance Components of Schoolwide Programs

Title I, Part A has the primary goal of enabling participating children to meet the Illinois Learning Standards. To meet this goal, Section 1114(b) of the NCLB Act of 2001 requires that each schoolwide program includes the following ten (10) components that research suggests are essential to high-quality programs. Each schoolwide program shall:

1. Conduct a comprehensive needs assessment of the entire school.

2. Employ schoolwide reform strategies that:
   - provide opportunities for all children to meet the State’s proficient and advanced levels of student academic achievement.
   - use effective methods and instructional strategies that are based on scientifically based research that:
     - strengthens the core academic program,
     - increases the amount and quality of learning time, such as providing an extended school year and before- and after-school and summer programs and opportunities, and helps provide an enriched and accelerated curriculum, and
     - includes strategies for meeting the educational needs of historically underserved populations.
   - includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting the Illinois Learning Standards who are members of target populations of any program that is included in the schoolwide program which may include:
     - counseling, pupil services, and mentoring services,
     - college and career awareness and preparation, such as college and career guidance, personal finance education, and innovative teaching methods, which may include applied learning and team-teaching strategies, and
     - the integration of vocational and technical education programs.
   - address how the school will determine if such needs of the children have been met.
   - are consistent with, and are designed to implement, State and local improvement plans, if any.

3. Provide instruction by highly qualified teachers.

4. Provide high quality and on-going professional development for teachers, principals, and paraprofessionals, and if appropriate, pupil services personnel, parents, and other staff to enable all children in the school to meet the Illinois Learning Standards.

5. Employ strategies to attract high-quality, highly qualified teachers to high-need schools.

6. Employ strategies to increase parental involvement, such as family literary services.

7. Develop plans for assisting preschool children in the transition from early childhood programs, such as Head Start, Even Start, Early Reading First, or a State-run preschool program, to local elementary school programs.

8. Implement measures to include teachers in the decisions regarding the use of academic assessment in order to provide information on, and to improve, the achievement of individual students and the overall instructional program.

9. Implement activities to ensure that students who experience difficulty mastering the proficient (meets) or advanced (exceeds) levels of academic achievement standards are provided with effective, timely additional assistance which include measures to ensure that students’ difficulties are identified on a timely basis and to provide sufficient information on which to base effective assistance.

10. Coordinate and integrate Federal, State, and local services and programs, including programs supported under the NCLB Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.
### Targeted Assistance School Programs & Schoolwide Programs

#### Crosswalk of Required Components

<table>
<thead>
<tr>
<th>Targeted Assistance</th>
<th>Schoolwide</th>
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<tbody>
<tr>
<td>Restrict Title I, Part A resources to help eligible, participating children meet the Illinois Learning Standards that are expected for all children.</td>
<td>X</td>
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<tr>
<td>Expand Title I, Part A resources to provide opportunities to all children in the school to meet the Illinois Learning Standards.</td>
<td>X</td>
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<tr>
<td>Ensure that planning for students served under this part is incorporated into existing school planning.</td>
<td>X</td>
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<tr>
<td>Conduct a comprehensive needs assessment of the entire school.</td>
<td>X</td>
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<tr>
<td>Use effective methods and instructional strategies that are based on scientifically based research that:</td>
<td>X  X</td>
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<tr>
<td>• strengthen the core academic program of the school,</td>
<td>X  X</td>
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<td>• give primary consideration to providing or increasing extended learning time, such as an extended school year, before-and after-school, and summer programs and opportunities,</td>
<td>X  X</td>
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<tr>
<td>• help provide an enriched and accelerated, high-quality curriculum,</td>
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<tr>
<td>• include strategies for meeting the educational needs of underserved populations,</td>
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<td>• minimize removing children from the regular classroom during regular school hours for instruction provided under this part,</td>
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<td>• include strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting the Illinois Learning Standards who are members of target populations of any program that is consolidated in the schoolwide program which may include:</td>
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<td>➢ counseling, pupil services, and mentoring services,</td>
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<td>➢ college and career awareness and preparation, such as college and career guidance, personal finance education, and innovative teaching methods, such as team-teaching strategies, and</td>
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<td>➢ the integration of vocational and technical education programs,</td>
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<td>• address how the school will determine if the needs of low achieving children and those at risk of not meeting the Illinois Learning Standards who are members of target populations of any program that is consolidated in the schoolwide program have been met, and</td>
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<td>• are consistent with, and are designed to implement, State and local improvement plans, if any.</td>
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<tr>
<td>Coordinate with and support the regular education program.</td>
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<tr>
<td>Coordinate services/develop plans to assist preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or State-run preschool programs to elementary school programs.</td>
<td>X  X</td>
</tr>
<tr>
<td>Provide opportunities for professional development with resources provided under this part, and, to the extent practicable, from other sources, for teachers, principals, and paraprofessional, including, if appropriate, pupil services personnel, parents, and other staff, who work with participating children in programs under this section or in the regular education program.</td>
<td>X</td>
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<tr>
<td>Provide high quality and on-going professional development for teachers, principals, and paraprofessionals, and if appropriate, pupil services personnel, parents, and other staff to enable all children in the school to meet the Illinois Learning Standards.</td>
<td>X</td>
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<tr>
<td>Provide instruction by highly qualified teachers.</td>
<td>X  X</td>
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<tr>
<td>Employ strategies to attract high-quality, highly qualified teachers to high-need schools.</td>
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<td>Employ strategies to increase parental involvement, such as family literacy services.</td>
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<td>Implement measures to include teachers in the decisions regarding the use of academic assessment in order to provide information on, and to improve, the achievement of individual students and the overall instructional program.</td>
<td>X</td>
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<td>Implement activities to ensure that students who experience difficulty mastering the proficient (meets) or advanced (exceeds) levels of academic achievement standards are provided with effective, timely additional assistance which include measures to ensure that students’ difficulties are identified on a timely basis and to provide sufficient information on which to base effective assistance.</td>
<td>X</td>
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<td>Coordinate and integrate Federal, State, and local services, including programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.</td>
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Schoolwide Flexibility Example

Consider a schoolwide program funded under Title I, Part A that also receives professional development funds under Title II, Part A and educational technology monies under Title II, Part D. This school could request via the NCLB Consolidated Application to spent Title II, Part D funds under Attendance and Social Work Services (Function 2110) to pay the salary (Object 100) of a school social worker. The school could also request to purchase computers under Educational Media Services (Function 2220/Object 500) with Title II, Part A funds. In a targeted assistance program, these activities are not approvable, but in a schoolwide program, they are allowable expenditures. The screenshot below, taken from the NCLB Consolidated Application, illustrates how this can happen. Notice the white and gray-filled budget cells. In a targeted assistance school, only the white cells are open for allowable expenditures. The gray-filled cells are blocked because they are not allowable costs. In a school operating with schoolwide authority, however, both the white and gray-filled cells are accessible and reflect allowable expenditures. The blackened cells across all budgets are blocked for all schools and cannot be opened for any reason.

This e-bulletin contains basic information on NCLB provisions. It is meant to provide a ready reference for school administrators, teachers, and the public on NCLB implementation within Illinois. It is not intended as a comprehensive source of information on the rules and regulations which govern NCLB Title I.