



# Illinois State Board of Education

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## BULLETIN NO. 01-15

**TO:** School District Superintendents  
School District Title I, Part A Directors

**FROM:** Melina Wright, Division Administrator, Title Grants Administration Division

**RE:** Title I Targeted Assistance and Schoolwide Programs

**DATE:** October 2015

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This e-bulletin updates previous e-bulletins on schoolwide buildings and available flexibility on use of funds in those buildings.

The purpose of Title I, Part A (Title I) of the *Elementary and Secondary Education Act of 1965* 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 standards and assessments. There are two types of Title I programs:

Targeted Assistance	Schoolwide
Supplemental education services to eligible, identified students with the greatest need	Comprehensive program designed to upgrade the entire educational program at a school with poverty percentage of 40% or more in order to improve achievement of the lowest-achieving students (whole-school reform)
Services must be targeted to specific at-risk students	All students may participate in Title I-funded initiatives
Only eligible students may participate in Title I-funded services	Addresses student needs through a schoolwide plan based on a comprehensive needs assessment
Use of funds must be consistent with specific Title I rules	Maximizes flexibility in using Federal funds

### *BASIC COMPONENTS OF 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,
- Developing a comprehensive schoolwide plan; and
- Annually reviewing the schoolwide plan.

### *DESIGNING A SCHOOLWIDE PROGRAM:*

In designing schoolwide programs, an LEA must

- ensure its comprehensive schoolwide plans include strategies for meeting the educational needs of historically underserved populations;
- ensure its comprehensive schoolwide plans include strategies for 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;

- provide effective, timely additional assistance to students who experience difficulty mastering the State's academic achievement standards;
- ensure that each schoolwide program school receives the same basic level of funds or resources from non-Federal sources to provide services, including those that are required by law for students with disabilities and English Learners before using Title I funds in the school; and
- 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.

#### *USE OF TITLE I FUNDS IN A SCHOOLWIDE PROGRAM:*

The use of funds is justified in the Title I grant application when use is supported by evidence from the needs assessment and by incorporation into the schoolwide plan. While “reasonable and necessary” tests remain as critical determinants of whether a use of Title I funds is allowable, in general, uses of Title I funds **must support the primary goal of Title I: that of providing students opportunities for high-quality education so they can reach, at a minimum, proficiency levels on state academic standards and assessments**. Specifically, schoolwide programs are expected to raise the achievement of the lowest-achieving students by upgrading the entire educational program. With these goals in mind, Title I funds could be used for, but not limited, to the following:

- Increased learning time (such as through additional time on task or additional staff to lower the teacher-to-student ratio).
- High-quality preschool or full-day kindergarten.
- Evidence-based strategies to accelerate the acquisition of content knowledge for English learners.
- Equipment, materials, and training needed to compile and analyze data to monitor progress, to alert the school of struggling students, and to drive decision making.
- Devices and software for students to access digital learning materials and collaborate with peers, and related training for educators.
- School climate interventions (such as bullying prevention).
- Instructional coaches to provide high-quality school-based, professional development.
- Evidence-based activities to prepare low-achieving students to participate successfully in advanced coursework.
- Activities that have been shown to be effective at increasing family and community engagement in the school.
- Family literacy programs.

#### *CAUTION REGARDING SCHOOL CONSTRUCTION AND REMODELING:*

Title I funds may not be used for school construction or renovation projects such as replacing a roof or installing air conditioning. No. 34 C.F.R. § 76.533 prohibits the use of program funds, including Title I, Part A funds, for construction, “unless specifically permitted by the authorizing statute or implementing regulations for the program.” No such authority exists for Title I, Part A. In interpreting this prohibition, we rely largely on the definition of “construction” used in the 1988 reauthorization of the ESEA, which contained the most recent definition of construction applicable to ESEA programs generally. That definition defines “construction” as “the preparation of drawings and specifications for school facilities; erecting, building, acquiring, altering, remodeling, improving, or extending school facilities; and the inspection and

supervision of the construction of school facilities.” This broad definition includes activities commonly defined as “renovation.”

But Title I funds may be used for “minor remodeling,” defined in 34 C.F.R. § 77.1(c) as “minor alterations in a previously completed building,” including “the extension of utility lines, such as water and electricity, from points beyond the confines of the space in which the minor remodeling is undertaken, but within the confines of the previously completed building.” The definition specifically excludes “building construction, structural alterations to buildings, building maintenance, or repairs.”

The following table summarizes some common misconceptions about the use of Title I funds in schoolwide programs:

<b>Misconception</b>	<b>Explanation of law</b>
<b>Title I funds are only for reading and math instruction.</b>	The school’s needs assessment identifies academic areas that need improvement.
<b>Title I funds are only for remedial instruction.</b>	The purpose of a schoolwide program is to upgrade the entire educational program in a school in order to raise the achievement of the lowest-achieving students. It could be that this upgrading is best accomplished by preparing low-achieving students to take advanced courses.
<b>Title I funds are only for serving low-achieving students.</b>	In a schoolwide program, funds can be used to improve the ENTIRE educational program for the benefit of ALL students, <i>particularly</i> low-achieving students.
<b>Title I funds are only for instruction.</b>	The school’s needs assessment and comprehensive schoolwide plan may find that to improve the school’s entire educational program, Title I funds may be needed to improve attendance, improve school climate, counteract bullying, or provide positive behavioral interventions and supports.
<b>Use of Title I funds is limited by “supplement not supplant” restrictions.</b>	A school operating a schoolwide program does not need to pass the traditional ‘Supplement, not supplant’ test. 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.
<b>Title I funds are not for preschool children.</b>	A schoolwide program may include 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 in order to prepare children to benefit from later school experiences. All preschool children who reside in the school’s attendance area are eligible to participate.

**SUPPLEMENT, NOT SUPPLANT:**

The supplement not supplant requirement in ESEA section 1120A(b) does not apply to 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 those funds the school would otherwise receive. To ensure that this occurs, a schoolwide program school relies on the equitable distribution of non-Federal funds.

Under ESEA section 1114(a)(2)(B):

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.

A schoolwide program may be supplanting if an LEA does not have sufficient non-Federal funds to provide even the most basic education program in all its schools OR if an LEA is required by State or local law to provide funding for a specific purpose for all students.

When a school has a schoolwide program and chooses to use flexibility within its program, the supplement not supplant test is changed to one governed by the:

- -Reasonable and necessary test,
- -Intent and purpose test,
- -Alignment with schoolwide plan,
- -Equity of base amount.

The district must affirm that all buildings in the district (regardless of if they receive Title I funds) are receiving an equal amount of state and local resources. Auditors will verify this equity whenever an audit occurs.

## Resources

*Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program* (July 2015)  
(not yet posted)

*Title I Fiscal Issues* (Feb. 2008) (<http://www2.ed.gov/programs/tleiparta/fiscalguid.pdf>)  
(supplement not supplant in a schoolwide program).

*Using Title I, Part A ARRA Funds for Grants to Local Educational Agencies to Strengthen Education, Drive Reform, and Improve Results for Students* (Sept. 2009)  
(<http://www.ed.gov/policy/gen/leg/recovery/guidance/tlei--reform.pdf>.) (factors to consider in selecting how to use Title I funds to carry out a Title I program.)

*Designing Schoolwide Programs* (Mar. 2006) (conducting a comprehensive needs assessment, developing and implementing a schoolwide plan, and revising a schoolwide program)  
(<http://www.ed.gov/policy/elsec/guid/designingswpguid.doc>).

*Serving Preschool Children Through Title I Part A of the Elementary and Secondary Education Act of 1965, as Amended* (Oct. 2012)  
(<http://www2.ed.gov/policy/elsec/guid/preschoolguidance2012.pdf>).