

APPENDIX 9

Appendix 9

Use of Funds for Title I, Part A Schoolwide Programs

Section 1114 of Public Law 107-110 authorizes campus that are eligible to operate schoolwide programs to use Title I, Part A funds in combination with other federal, state, and local funds in order to improve student performance by upgrading the entire educational program in a school. Such schoolwide programs are exempt from statutory or regulatory requirements of other federal education programs, provided that the intent and purposes of other such programs are met and the needs of the intended beneficiaries of the federal fund sources combined are met. The effectiveness of the program is measured by student performance.

Schoolwide Plan

According to the Texas Education Code, Section 11.251(f), LEA policies must ensure that all pertinent federal planning requirements are addressed through the district- and campus-level planning process. Therefore, the schoolwide campus plan requirements for a Title I schoolwide campus are to be incorporated in the campus improvement plan. Specific requirements related to Title I, Part A schoolwide planning are as follows:

- Title I, Part A funds on a schoolwide campus may be used only to support activities identified by the comprehensive needs assessment and described in the campus improvement plan.
- Any eligible school that wishes to operate a schoolwide program shall first develop (or amend for such a program that was in existence on the day before the enactment of the No Child Left Behind Act of 2001), in consultation with the LEA and its school support team or other technical assistance provider under P.L. 107-110, Section 1117, **a comprehensive plan for reforming the total instructional program** in the school that—
 1. Incorporate the requirements of a Schoolwide Plan as cited in P.L. 107-110, Section 1114(b);
 2. Clearly incorporate the ten components of a Schoolwide Program;
 3. Describe how the school will use Title I, Part A resources and other sources to implement the ten components;
 4. Include a list of state and federal programs whose funds will be combined to implement a schoolwide program;
 5. Describe how the intent and purposes of the federal programs whose funds are combined on a schoolwide campus are met; and
 6. Include sufficient activities to **address the needs of the intended beneficiaries** of the federal programs whose funds are combined on a schoolwide campus for upgrading the entire education program.

Schoolwide Plan
(continued)

The comprehensive plan shall be:

1. Developed during a one-year period, unless—
 - a. the LEA, after considering the recommendation of the technical assistance providers under Section 1117(c) and (e), determines that less time is needed to develop and implement the schoolwide program; or
 - b. the school was operating a schoolwide program on the day preceding the date of enactment of the No Child Left Behind Act of 2001, in which case such school may continue to operate such program, but shall develop amendments to its existing plan during the first year of assistance under such Act to reflect the plan provisions;
2. Developed with the involvement of the parents and other members of the community to be served and individuals who will carry out such plan, including teachers, principals, and, administrators (including administrators of programs described in other parts of Title I) and if appropriate, pupil services personnel, technical assistance providers, school staff, and, if the plan relates to a secondary school, students from such school.
3. In effect for the duration of the school's participation in Title I, Part A and reviewed and revised, as necessary, by the school;
4. Available to the LEA, parents, and the public, and the information contained in such plan shall be in an understandable and uniform format and, to the extent feasible, provided in a language that the parents can understand; and
5. If appropriate, developed in coordination with programs under the Reading First, Early Reading First, Even Start, the Carl D. Perkins Vocational and Technical Education Act of 1998, and the Head Start Act.

A school that chooses to use funds to support Title I, Part A schoolwide programs is **NOT** exempt from requirements relating to:

- health, safety, civil rights, and gender equity;
- student and parental participation and involvement;
- services to private school children;
- maintenance of effort;
- comparability of services; or
- uses of federal funds to supplement and not supplant.

The Secretary of Education authorizes a schoolwide program school to use funds from most federal education programs administered by the Secretary to support its schoolwide program. This authority also extends to services, materials, and equipment purchased with those funds and provided to the school.

Accounting for Schoolwide Program Funds

Combining funds to meet the collective needs of the included programs on a schoolwide campus allows schools to address needs in an integrated way and relieves schools from the burden of documenting that a specific program dollar was expended for a specific program activity. In other words, the federal funds lose the “**program**” identity. However, the federal funds **do NOT lose their “fiscal” identity**.

For example, Title IV—Safe and Drug-Free Schools and Communities (SDFSC) funds combined on a schoolwide campus do not have to be tracked back to allowable SDFSC activities. However, SDFSC expenditures **do** have to be tracked back to the SDFSC Fund Code 204, and all generally accepted accounting principles must be followed. In addition, the school must be able to demonstrate (i.e., document) that it met the intent and purposes of the SDFSC program and that the needs of the intended beneficiaries of the SDFSC program were met. This means that when SDFSC funds are used on a schoolwide campus, all students and all teachers are provided a comprehensive drug use prevention and violence prevention program and that those programs meet the requirements of the SDFSC Principles of Effectiveness.

Mandatory Codes for Schoolwide Programs

According to **FAR**, the following account codes are **mandatory** for all LEAs, including those LEAs implementing schoolwide programs:

- ◆ Fund Code (3 digits)—Special Revenue Code
- ◆ Function Code (2 digits)
- ◆ Object Code (4 digits)
- ◆ Organization Code (3 digits)
- ◆ Fiscal Year Code (1 digit)
- ◆ Program Intent Code (2 digits), if required by FAR
- ◆ Optional Codes—as appropriate.

Options for Budgeting Accounting Reporting

A schoolwide campus is not required to track specific program dollars to specific program activities. However, a campus must track federal funds fiscally. The manner in which an LEA accounts for federal funds on a schoolwide campus is determined by how federal funds are expended on a schoolwide campus. For federal funds that are combined to upgrade the entire educational program at the campus, the LEA has three options:

Option 1: An LEA may choose to have a campus account for all expenditures by the special revenue fund code for each federal program as the LEA would on a targeted-assistance campus. In this case, funds will be budgeted in the appropriate SAS application by class/object code, and amendments would be submitted according to the rules and regulations governing fiscal and program changes.

Option 2: An LEA may choose to transfer federal program funds to a schoolwide campus budget through a locally defined system of federally funded special revenue fund codes. For example, if a schoolwide campus plans to use Title I, Title II, and Title IV program funds on a schoolwide campus to upgrade the entire educational program, the LEA would transfer these program funds to the schoolwide campus using a locally defined federally funded special revenue fund code for each program. By using this option, the LEA would budget program funds for schoolwide campuses as a lump sum in class/object code 8911—Operating Transfers Out. Because the program funds are

transferred to a locally defined federally funded special revenue fund code on a schoolwide campus, the program funds are automatically identified as being included on a schoolwide campus for upgrading the entire educational program.

Option 3:

An LEA may choose to have a campus include all federal funds that are eligible to be combined in a schoolwide campus budget and are used to upgrade the entire educational program in a single, locally defined federally funded special revenue fund code. If the LEA chooses this option, the campus should allocate expenditures to the separate federal fund sources according to the percentage that each federal program contributed to the total combined amount.

For example, if a campus has a schoolwide program with a total of \$100,000 from federal programs [\$50,000 from Title I, Part A; \$10,000 from Title I, Part C (Migrant); \$20,000 from Title VI—Innovative; and \$20,000 from the Carl D. Perkins Vocational and Applied Technology Act], the campus would combine these funds together in a locally defined revenue code for federal funds on a schoolwide program campus. The campus would then allocate expenditures to the appropriate program by the percentage the program contributed for reporting by the LEA on WEB-ER. In this case, the expenditures would be charged as follows: 50% to Title I, Part A; 10% to Title I, Part C; 20% to Title VI—Innovative; and 20% to the Perkins program.

If the schoolwide program has federal funds remaining at the end of the project year, the funds would revert back to each of the federal programs according to the same percentages.

Funds that are to be included in a combined schoolwide budget in this manner will be budgeted on Schedule #3—Budget Summary as class/object code 8911, Operating Transfer Out.

**For LEAs
Implementing
Option 2 or 3:**

1. No SAS amendments are needed pertaining to the use of funds budgeted under 8911.
2. For fiscal reporting requirements under FAR, the campus must continue to track and report expenditures to PEIMS by class/object code to each fund source separately. Using a journal voucher, the LEA must reclassify the expenditures from the locally defined federally funded special revenue fund codes used by the campus to the special revenue fund codes assigned to the specific federal programs by FAR.

**Beginning and Ending
Dates for Schoolwide
Program Applications**

Schoolwide programs are authorized under the Title I, Part A statute. Therefore, federal funds that are expended to support a schoolwide campus program may not be combined on a schoolwide campus **earlier than** the submission date of the consolidated NCLB application for Title I, Part A funds or July 1, whichever is later.

The allocation of expenditures should be based on the same percentage that the programs represent in the combined schoolwide campus program account on the “as of” date for reporting expenditures. The ending date of the Title I, Part A program cannot be later than June 30.

Fiscal and Program Requirements for All Schoolwide Programs

Appendix 9—continued

In summary, the following fiscal and program requirements apply to all schoolwide programs.

1. The LEA must be able to maintain an audit trail according to budget authority in the Notice of Grant Award for federal funds expended on a schoolwide campus.
2. The LEA must be able to demonstrate comparability of services and/or maintenance of effort as required by each federal program.
3. Program activities included on a schoolwide campus must be implemented and evaluated as required by each federal program.
4. Federal funds on a schoolwide campus must be used to meet the needs identified through the school's comprehensive needs assessment and the school reform activities described in the Campus Improvement Plan which incorporates the requirements of the Schoolwide Program Plan.
5. Documentation at the local level must be maintained to demonstrate that appropriate activities were conducted to reasonably address the needs of the intended beneficiaries of the federal programs included on a schoolwide campus and that the intent and purposes of each federal program were met.

Technical Assistance

Technical assistance on schoolwide program requirements and accounting for funds combined on schoolwide campuses is available at the regional Education Service Centers (ESCs).