

Oklahoma State Department of Education
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Consolidated Schoolwide Funds

Title I Schoolwide Program

- The underlying purpose of the schoolwide approach is to enable sites with high numbers of at-risk children to integrate the services they provide to their children from Federal, State, and local resources.
- By making systemic changes that knit together services funded from all sources into a comprehensive framework, sites will have a better chance of increasing the academic success of all their students.

Purpose of Consolidating Funds

The purpose of consolidating funds is to help a schoolwide site effectively design and implement a comprehensive plan to upgrade the entire educational program based on the identified needs through its comprehensive needs assessment.

Types of Consolidation

- Consolidate only Federal funds
- Consolidate Federal, State, and local funds

Note: LEAs are encouraged to consolidate as many eligible formula Federal program funds as possible. Competitive grants may not be used in consolidating funds.

What Does Consolidating Funds Mean?

- Schoolwide sites treat the funds being consolidated as a single, conceptual “pool” of funds.
- Funds from the contributing programs lose their identity.
- The site uses funds from this “pool” to support any activity of the schoolwide plan without regard to which program contributed the specific funds.

Fiscal and Programmatic Requirements

- Health and safety
- Civil Rights
- Participation and involvement of parents and students
- Private school children, teachers, and other educational personnel
- Maintenance of effort
- Comparability of services
- Supplement, not supplant

Required Components of the Schoolwide Plan

- The schoolwide site must identify which programs are included in the consolidation and the amount each program contributes to the consolidated schoolwide “pool”.
- Describe and maintain records that demonstrate how the intent and purposes of each of the Federal programs being consolidated will be met.
- The historical site-level basic educational program must be identified and continue to be offered.

Funds that can be Consolidated

- State aid and local tax revenue
- Title I, Part A
- Title II, Part A
- Title III, Part A
- Title IV, Part A
- Title V, Part A
- Title VI, Part B, Rural and Low Income Schools

Consolidation of Funds with Restrictions

Title I, Part C Migrant

- Consult with parents of migratory children or organizations representing these parents, or both.
- Address the identified needs of migratory children that result from the effects of their migratory lifestyle or are needed to permit migratory children to participate effectively in school.
- Document that services to address those needs have been provided.

Title I, Part D

- Can be consolidated if they are funds generated from Subpart 2.
- Subpart 2 funds support programs in LEAs with high numbers of students in local correctional facilities and community day programs.

Consolidation of Funds with Restrictions (cont'd)

Title VII

- Can be consolidated after the parent committee established by the LEA to develop the Indian education program approves the inclusion of those funds.

Individuals with Disabilities Education Act (IDEA)

- All other requirements of the IDEA, such as rights and services afforded individual children with disabilities, are met.

Funds that Cannot be Consolidated

- Head Start programs
- National School Lunch Program
- 21st Century Grant Funds
- Other Competitive Grants

Meeting the Intent and Purposes

- The site must be able to demonstrate that its schoolwide program contains sufficient resources and activities to reasonably address the intent and purposes of the included programs, particularly as they relate to the lowest-performing students.
- The site may only use consolidated funds to meet the intent and purposes of the funding sources that are “pooled.”
- Sites may only use funds to support state/local activities if state/local funds are included in the consolidation.

Program Intent and Purpose

State and Local Funds

- Maintenance & Operations

Title I

- Help students achieve proficiency on State academic standards

Title I, Part D, Subpart 2

- Collaboration with locally operated correctional facilities

Program Intent and Purpose

Title II, Part A

- Improving Teacher and Principal Quality

Title III

- Ensure that limited English proficiency children become proficient in English

IDEA, Part B

- All children with disabilities have an appropriate education designed to meet their individual needs

Allocating Funds to the Schoolwide Site

LEAs will need to develop allocations for funding each of the schoolwide sites.

- The process to determine the amount allocated can be different for each Federal grant.
- The LEA can use formula allocations, similar to ones used in Title I.
- The amount can also be determined through allocations based on the needs of the site as determined by the site's improvement plan.

Allocating Funds to the Schoolwide Site

- LEAs will need to complete a form showing the total Federal funds and the percentage being consolidated from each grant for each schoolwide site.
- The amount of Federal funds and the contributing Federal funds can vary between sites based on their improvement plans and consolidated application.
- Schoolwide Consolidated funds are budgeted at the site level.

Budgeting

- The budget should be developed and implemented in close on-going consultation between the LEA and site-level administrators.
- The basis of the budget should be the site's schoolwide plan and the consolidated application.
- The budget should support the goals and curriculum objectives needed to carry out the schoolwide plan.
- The emphasis is on a high-quality schoolwide plan rather than the level of description included in the budget.

District Set Asides

- Homeless
- Private schools equitable services
- District-wide summer school
- District-wide Pre-K
- Neglected and Delinquent
- Parent Involvement – must comply with Title I requirements
- School Choice
- Professional Development
- Indirect Cost

District Set Asides

- Determine administrative cost and set-asides in accordance to the legislative requirements for each Federal program.
- LEA is required to set aside funds on the district-wide Title I budget.
- Set aside funds must be accounted for separately from the consolidated funds.

Time and Effort

- Follow OMB Circular A-87
- If a site consolidates Federal, State, and local funds, it is not required to file a semi-annual certification.
- If a site does not consolidate Federal, State, and local funds and an employee is paid from a single cost objective, semi-annual certification is required.
- If a site does not consolidate Federal, State, and local funds and an employee is paid from multiple cost objectives, time and effort documentation is required.

Supplement, not Supplant

- Each site operating a schoolwide program must receive all the State and local funds it would otherwise receive to operate its basic educational program in the absence of any Federal funds.
- It is the LEA's responsibility, not the site's, to be able to show that it distributes Federal, State, and local funds equitably to all sites.
- It is not required to demonstrate that a particular service is supplemental.

Maintenance of Effort (MOE)

- LEA's combined fiscal effort per student or the aggregate expenditures of the LEA from State and local funds for free public education for the preceding year is not less than 90% of the combined fiscal effort or aggregate expenditures for the second preceding year.
- In determining maintenance of effort for a schoolwide program, the LEA can calculate the percentage of Federal funds in the schoolwide program and exclude this percentage from its maintenance of effort determination.

Comparability

- State and local funds used to provide services in Title I schools are at least comparable to services provided in schools not receiving Title I funds.
- LEAs having multiple attendance areas serving same or similar grade spans must demonstrate compliance with comparability requirements annually.

Equitable Services

- Funds must be shared with private school as required by legislation.

Carryover

- 15% carryover still applies to Title I allocations.
- The LEA must maintain the ability to determine if Federal funds are unspent at the end of the fiscal year.

Record Keeping

- Sites that meet all the requirements of a schoolwide program are not required to maintain separate fiscal accounting records by program.
- The LEA must be able to show the amount of funds allocated to each of its schoolwide program sites from each Federal program.
- Documentation must be maintained which shows that sufficient resources have been allocated to ensure the intent and purposes of programs were fulfilled.
- LEAs must separate consolidated schoolwide funds to show salaries, benefits, services, materials and supplies, etc.
- Reimbursements will occur from each funding source.

Record Keeping (cont'd)

An LEA does not literally need to combine funds in a single account or pool with its own accounting code. Rather, the word “pool” is used conceptually to convey that a schoolwide program school has the use of all consolidated funds available to it for the dedicated function of operating a schoolwide program without regard to the identity of those funds.

- See section E-3 of the Fiscal Issues Guidance for examples

Ineligibility Criteria

- Monitoring Findings
- Expenditure Report deviations
- Lack of internal controls
- Single audit findings
- Operating at a deficit
- Lack of site-level decision making
- Late applications or schoolwide plans that do not adequately address all of the schoolwide components

References

Applicable Federal Law and Regulations

- NCLB, Title I, Part A,
 - Section 1111 – State Plans
 - Section 1114 – Schoolwide Programs
 - Section 1116 – Academic Assessment and LEA and School Improvement
 - Section 1117 – School Support and Recognition
 - Section 1118 – Parental Involvement
 - Section 1119 – Qualifications for Teachers and Paraprofessionals

References

Applicable Federal Law and Regulations

- CFR, Title 34, Part 200, Sections 200.25 through 200.29
 - 200.25 – Schoolwide Programs in General
 - 200.26 – Core Elements of a Schoolwide Program
 - 200.27 – Development of a Schoolwide Plan
 - 200.28 – Schoolwide Program Components
 - 200.29 – Coordination of Funds in a Schoolwide Program
- *69 FED. REG. 40360-64 (JULY 2, 2004)*
- *EDGAR*
- *Office of Management and Budget (OMB) Circular A-87*

References

Federal Non-Regulatory Guidance:

- Designing Schoolwide Programs, March 2006 (Program Design/10 Required Components)
<http://www.ed.gov/policy/elsec/guid/designingswpguid.doc>
- Title I Fiscal Issues, February, 2008
<http://www.ed.gov/programs/titleiparta/fiscalguid.doc>

Consolidated Funds Pilot PLC

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