

*NEVADA DEPARTMENT OF EDUCATION
GUIDANCE DOCUMENT FOR
Title I, Part A*



Schoolwide Program

Created by the Nevada Department of Education
Title I Team
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Schoolwide Program

1. Overview of Schoolwide Program

1.1. Introduction

This model allows the most flexibility in the use of Title I funds. The plan should include a description of the comprehensive needs assessment conducted for the school and the required Schoolwide components. For most schools in Nevada, the School Performance Plan (SPP) process may meet this requirement. Please note that in general, schools must be at least 40% poverty to operate a SW model. The State may waive the 40% poverty threshold for Schoolwide programs upon waiver request and demonstration that Schoolwide program would best serve the needs of students.

1.2. Schoolwide Program Guidance from Nevada Department of Education

A schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school; its primary goal is to ensure that all students, particularly those who are low achieving, demonstrate proficient and advanced levels of achievement on State academic achievement standards. A schoolwide program has three core elements: the comprehensive needs assessment; the comprehensive site plan; and the annual review of the plan. Schools are required to 1) Conduct a comprehensive needs assessment to identify school's strengths and challenges in key areas that affect student achievement; 2) Create a comprehensive schoolwide plan that includes clearly identified and specific goals, objectives, interventions, and strategies that address those needs identified in the needs assessment; and 3) Conduct an annual evaluation of the effectiveness of the schoolwide program plan and revise the plan as necessary.

A schoolwide program provides educational services to all students, improves all structures that support student learning and aligns all resources to achieve a common goal: improved student achievement for all students. A school operating a schoolwide program must have a current schoolwide plan and/or School Performance Plan. The schoolwide site plan must include ten required components: a comprehensive needs assessment; school reform strategies; instruction by highly qualified teachers; high-quality, ongoing professional development; strategies to attract highly qualified teachers; strategies to increase parental involvement; plans to assist in transitions; measures to include teachers in decisions; activities to ensure students receive effective, timely, additional assistance; and coordinate and integrate Federal, State and local services and programs. A school operating a schoolwide program must retain documentation related to the three core components. Documentation should be kept on

site for at least five (5) years. Documents should be accessible to all stakeholders and may be requested by the Nevada Department of Education for monitoring purposes.

2. Schoolwide Program under ESEA

3.1. Section 1114

Under ESEA Section 1114, a local educational agency may consolidate and use Title I, Part A funds together with other federal, state, and local funds, in order to upgrade the entire educational program of a school with a poverty rate of at least 40 percent. 20 USC 6314 (a)(1)(A). The state Title I Director may waive the 40% schoolwide requirement. Under ESSA section 1114(a)(1)(B), “A school that serves an eligible school attendance area in which less than 40 percent of the children are from low-income families, or a school for which less than 40 percent of the children enrolled in the school are from such families, may operate a schoolwide program under this section if the school receives a waiver from the State educational agency to do so, after taking into account how a schoolwide program will best serve the needs of the students in the school served under this part in improving academic achievement and other factors.”

3.2. 34 CFR 200.25

§ 200.25 Schoolwide programs in general.

(a) Purpose.

- (1) The 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 under § 200.1.
- (2) The improved achievement is to result from improving the entire educational program of the school.

(b) Eligibility.

- (1) A school may operate a schoolwide program if -
 - (i) The school's LEA determines that the school serves an eligible attendance area or is a participating school under section 1113 of the ESEA; and
 - (ii) For the initial year of the schoolwide program -
 - (A) The school serves a school attendance area in which not less than 40 percent of the children are from low-income families; or
 - (B) Not less than 40 percent of the children enrolled in the school are from low-income families.
- (2) In determining the percentage of children from low-income families under paragraph (b)(1)(ii) of this section, the LEA may use a measure of poverty that is different from the measure or measures of poverty used by the LEA to identify and rank school attendance areas for eligibility and participation under subpart A of this part.

(c) Participating students and services. A school operating a schoolwide program is not required to -

- (1) Identify particular children as eligible to participate; or

- (2) As required under section 1120A(b) of the ESEA, provide services that supplement, and do not supplant, the services participating children would otherwise receive if they were not participating in a program under subpart A of this part.
- (d) Supplemental funds. A school operating a schoolwide program must use funds available under subpart A of this part and under any other Federal program included under paragraph (e) of this section and § 200.29 only to supplement the total amount of funds that would, in the absence of the Federal funds, be made available from non-Federal sources for that school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency.
- (e) Consolidation of funds. An eligible school may, consistent with § 200.29, consolidate and use funds or services under subpart A of this part, together with other Federal, State, and local funds that the school receives, to operate a schoolwide program in accordance with §§ 200.25 through 200.29.
- (f) Prekindergarten program. A school operating a schoolwide program may use funds made available under subpart A of this part to establish or enhance prekindergarten programs for children below the age of 6, such as Even Start programs or Early Reading First programs.
- (Authority: 20 U.S.C. 6314)
[67 FR 71718, Dec. 2, 2002]

3.3. Required Elements

A school operating a schoolwide program may use Title I funds for any activity that supports the needs of students as identified through the comprehensive needs assessment and identified in the schoolwide plan. To ensure that a school's comprehensive plan best serves the needs of those children who are failing, or are at-risk of failing, to meet the challenging State academic standards, the school must conduct a comprehensive needs assessment. (ESEA section 1114(b)(6)). The school must consult with a broad range of stakeholders, including parents, school staff, and others in the community, and examine relevant academic achievement data to understand students' most pressing needs and the root causes. (ESEA section 1114(b)(2); 34 C.F.R. § 200.26(a)). As appropriate and applicable, the schoolwide plan must be developed in coordination and integration with other Federal, State, and local services, resources, and programs, such as programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education programs, career and technical education programs, and schools implementing comprehensive support and improvement activities or targeted support and improvement activities (ESEA section 1114(b)(5)). A comprehensive schoolwide plan must describe how the school will improve academic achievement throughout the school, but particularly for the lowest-achieving students, by addressing the needs identified in the comprehensive needs assessment. (ESEA section 1114(b)(7)). The schoolwide plan must include a description of how the strategies the school will be implementing will provide opportunities and address the learning needs of all students in the school, particularly the needs of the lowest-achieving students. (ESEA section

1114(b)(7)(A)(i), (iii)). The plan must also contain descriptions of how the methods and instructional strategies that the school intends to use will strengthen the academic program in the school, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, including programs and activities necessary to provide a well-rounded education. (ESEA section 1114(b)(7)(A)(ii)). To ensure that the plan results in progress toward addressing the needs of the school, the plan should include benchmarks for the evaluation of program results. The schoolwide plan must be evaluated annually, using data from the State's assessments, other student performance data, and perception data to determine if the schoolwide program has been effective in addressing the identified areas of improvement and increased student achievement, particularly for the lowest-achieving students. Schools must annually revise the plan, as necessary, based on student needs and the results of the evaluation to ensure continuous improvement. (ESEA section 1114(b)(3); 34 C.F.R. § 200.26(c)). The U.S. Department of Education has emphasized that a comprehensive schoolwide must include strategies for: meeting the educational needs of all students, including each subgroup of students defined in ESEA Section 1111(c)(2) (20 USC 6311 (c)(2)) (economically disadvantaged students, students from major racial and ethnic groups, children with disabilities, and English learners); and addressing the needs of students who are failing or are at risk of failing to meet the challenging state academic standards.

An LEA must ensure that each schoolwide program school receives a basic level of funds or resources from non-Federal sources to provide services that are required by law for students with disabilities and English Learners before using Title I funds in the school. An LEA operating a schoolwide program must 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. If a schoolwide program consolidates Federal funds, it must ensure that it meets the intent and purposes of each Federal program whose funds it consolidates.

3. Waiver Request

Waiver requests should be made in a timely manner and be addressed to the Title I Director. The district should submit a waiver request(s) with the initial ePAGE Consolidated Application in the Related Documents section. The Title I Director's waiver request decision will be placed in the History Log and the LEA must upload the NDE response letter under Related Documents. This request will be based on the prior school year's FRL percentage, with the understanding the current school year's FRL percentage will be available after the October 1 count date and district's validation period. Districts must review the current school year's FRL when it is available and revise waiver request(s) if applicable.

These requests must include:

- the name of the school(s) the LEA is requesting a waiver for;
- the current free and reduced lunch (FRL) percentage of the school(s) based on the Nevada Department of Education's State Edition of Infinite Campus system (SAIN) data for Nevada Schools: Number of Free and Reduced Students by School Building report;
- review of the required components and evaluation of the Title I Schoolwide Program Plan; and
- justification and explanation of how implementation of the schoolwide program will best serve the needs of students at the school(s) in improving academic achievement and other factors.

Appendix

Appendix A: Frequently Asked Questions

Can a school remain schoolwide even if the school is under 40% poverty? Yes, the school can remain Schoolwide as long as the school is Title I-A eligible and the instructional staff members all meet the state qualifications and certification requirements.

How many stakeholders are needed for the Schoolwide Program planning? Every applicable group needs to be represented. There is no set number of stakeholders.

What are the required components of a SWP plan? The SWP plan shall include a description of the strategies that the school will be implementing to address school needs, including a description of how such strategies (ESSA Section 1114[b][7][A]) will—(i) provide opportunities for all children, including each of the subgroups of students to meet the challenging State academic standards; (ii) use methods and instructional strategies that strengthen the academic program in the school, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, which may include programs, activities, and courses necessary to provide a well-rounded education; and (iii) address the needs of all children in the school, but particularly the needs of those at risk of not meeting the challenging State academic standards. Additionally, the SWP plan shall: Describe how the school will carry out each of the components under 34 CFR 200.28 (34 CFR 200.27[a][3][i]); to include: Strategies in the overall instructional program (34 CFR 200.28[a]); Ensure instruction by highly qualified teachers and provide ongoing professional development (34 CFR 200.28[b]); Involve parents in the planning, review, and improvement (34 CFR 200.28[c]); Plans for assisting preschool students in the successful transition from early childhood programs (34 CFR 200.28[e]).

Who shall the SWP plan development involve? The SWP plan shall be developed with the involvement of parents and other members of the community to be served and individuals who will carry out such plan, including teachers, principals, other school leaders, paraprofessionals present in the school, administrators (including administrators of programs described in other parts of this subchapter), the LEA, to the extent feasible, tribes and tribal organizations present in the community, and, if appropriate, specialized instructional support personnel, technical assistance providers, school staff, if the plan relates to a secondary school, students, and other individuals determined by the school (ESSA Section 1114[b][2]).

When shall the SWP plan be monitored and revised? The SWP plan and its implementation shall be regularly monitored and revised as necessary based on student needs to ensure that all students are provided opportunities to meet the challenging State academic standards (ESSA Section 1114[b][3]).

What shall strategies, activities or interventions be based on? Title I, Part A funded strategies, activities or interventions that are included in the SWP plan need to be those that are

most likely to meet the identified needs of students and contribute to improved student outcomes. The selected strategies must meet the threshold of one of the four levels of the evidence-based strategies specified in ESSA Section 8101(21)(A). The selected strategies also need to be measurable so the success of the students and the program can be determined.

Must a SWP plan include a budget? Yes. ESSA Section 1114(b) specifies Title I, Part A funds shall be used to implement the various program components in a SWP plan. The SWP plan is required to describe how the school will use Title I, Part A and from other funds to carry out the SWP components (34 CFR 200.27[a][3][ii]).

How does a SWP consolidate funds in the SWP Plan? A SWP may consolidate funds from Federal, State, and local sources to implement the school's comprehensive plan to upgrade its entire educational program (ESSA Section 1114[a][1]; Section 1114[a][3][A]-[B]; 34 CFR 200.29[a]). The SWP is not required to maintain separate fiscal accounting records by program that identify the specific activities supported by those particular funds in order to demonstrate that the activities are allowable under the program (ESSA Section 1114[a][3][C]; 34 CFR 200.29[b][1][i]-[ii]; & 34 CFR 200.29[d][1]-[2]).

Appendix B: Schoolwide Program Waiver Request Template

TITLE I SCHOOLWIDE PROGRAM ELIGIBILITY WAIVER REQUEST

For schools below 40% Poverty Threshold Requirement

Section 1114(a)(1)(A) of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA), requires a Title I school to have at least 40% poverty to be eligible to operate a schoolwide program. Schoolwide flexibility allows a school to upgrade the entire educational program of a school. ESEA section 1114 (a)(1)(B) permits a State Education Agency (SEA) to waive the 40% poverty threshold requirement, after taking into account how a schoolwide program will best serve the needs of the students in the school while improving academic achievement and other factors. The Title I Schoolwide Program justification, assurances, and request is applicable only to Title I schools seeking waiver of 40 percent poverty threshold.

Instructions

- A. *Review required components of a Title I Schoolwide Program Plan*
- B. *Review annual evaluation requirements for Schoolwide Programs*
- C. *Provide a complete response to justification question*
- D. *Complete 40% poverty waiver request information*
- E. *Sign and email a pdf copy of this assurance statement to Gabriella Pingue, Esq.
Title I Programs Director
Office of Student and School Supports, Nevada Department of Education
gpingue@doe.nv.gov*

Requirements of a Title I Schoolwide Program Plan

Under Section 1114(b-d) of the Every Student Succeeds Act, a Schoolwide program plan must be:

- Developed with the involvement of parents and other members of the community to be served and individuals who will carry out the plan, including teachers, principals, other school leaders, paraprofessionals, and administrators of programs included;
- Regularly monitored and revised as necessary based on student needs;
- Developed in coordination and integration with other Federal, State, and local services, resources, and programs;
- Based on a comprehensive needs assessment of the entire school that takes into account information on the academic achievement of children in relation to the challenging State academic standards, particularly those children who are failing or most at risk of failing to meet those standards;
- Inclusive of description of the strategies the school will use to: 1) Provide opportunities for all children to meet the challenging State academic standards, particularly those most at risk of not meeting those standards; and 2) Strengthen the academic program of the school, increase the amount and quality of learning time, and provide an enriched and accelerated curriculum, which may include programs, activities, and courses necessary to provide a well-rounded education.

Annual Evaluation Process for Schoolwide Programs

- The school must evaluate annually the outcomes and the plan's implementation to determine whether the academic achievement of all students, and particularly of the school's low-achieving students, improved; whether the goals and objectives contained in the plan were achieved; and if the plan is still appropriate as written.
- In addition, the Schoolwide plan must describe how the school will provide individual student assessment results, including the interpretation of those results, to parents of the student; and describe how the results of annual evaluation of the effectiveness of this Schoolwide plan will be used to make revisions to the plan to ensure continuous improvement of students in this Schoolwide program.

Justification (provide a complete response)

How will a schoolwide approach be more beneficial than a targeted assistance approach in meeting the educational needs of all students, particularly those students farthest from meeting the state's challenging academic standards? [Click here to enter text.](#)

Waiver Request (school's poverty percentage is less than 40 percent)

Under Section 1114(a)(1)(B) of the Every Student Succeeds Act, the State may waive the requirement that a school have at least 40 percent poverty to be eligible to run a Schoolwide program. By providing the school's poverty percentage below, the district requests that the poverty percentage requirement be waived to allow the applicant school to operate a Title I Schoolwide program to better meet the needs of its students for the reasons stated in the Justification section above. The school's poverty percentage is currently [\(Click here to enter text\)](#) percent.

Statement of Assurances

The district has reviewed the Schoolwide Plan for the school and can verify that the plan adequately addresses the required components of a Schoolwide Plan and an annual evaluation process as outlined above.

District [\(Click here to enter text.\)](#).

School [\(Click here to enter text.\)](#)

Principal [\(Click here to enter text.\)](#)

Authorized Signatory [\(Click here to enter text.\)](#)

Typed Name [\(Click here to enter text.\)](#).

Title [\(Click here to enter text.\)](#)

Date [\(Click here to enter text.\)](#)

Appendix C: Schoolwide Program Waiver Request Example

Date

Gabrielle Pingue
Nevada Department of Education
9890S. Maryland Parkway
Las Vegas, NV 89183

Dear Ms. Pingue,

In the 2017-2018 school year, the free/reduced lunch program was 40.31% at [Name of School] and 40.79% at [Name of School]. In the 2018-2019 school year, the FRL of both schools fell below 40%, with [Name of School] at 39.68% and [Name of School] at 37.64%. Both schools received Title I funds in the 2017-2018 school year to implement a schoolwide program.

The [Name of School District] requests that [Name of School] and [Name of School] be able to continue their Title I schoolwide program for one year to prevent a disruption of services to students. It is understood that this is a one year hold and services will not continue beyond the 2019- 2020 school year if they are not above the 40% FRL threshold.

The 40% FRL waiver for [Name of School] will allow the school to split fund a PD strategist. The PD strategist will assist in increasing student achievement and teacher effectiveness by working closely with teachers throughout the year providing supports such as providing newer teachers professional development opportunities, co-teaching, and working with teachers to ensure the lessons are driven by student data.

[Name of School] will be able to purchase and implement research-based reading and math intervention programs (Amplify, Haggerty Phonics and FASTT Math) targeting tier II and tier III students. In addition, the waiver will allow the school to purchase 34 Chromebooks to be used in the implementation of the programs as well as increase students' access to technology. [Attach documents as necessary, such as school performance plans, etc...]

Thank you for your consideration.