

## **Consolidating Funds in a Title I, Part A Schoolwide Program**

A school operating a Title I, Part A schoolwide program may consolidate federal, state, and local education funds to better address the needs of students in the entire school. If a schoolwide school consolidates Title I, Part A with other allowable funds, the Title I, Part A schoolwide plan must list the specific federal, state, and local resources that will be consolidated in the schoolwide program. This section outlines which federal, state, and local funds may be consolidated into a schoolwide and the specific requirements that apply.

It is important to note that Title I, Part A funds can be used to support comprehensive initiatives in a schoolwide school even if Title I, Part A funds are not consolidated with other program funds.

A school that chooses to consolidate funds within its Title I, Part A schoolwide program is not exempt from the following federal requirements:

- Health, safety, civil rights, and gender equity.
- Student and parental participation and involvement.
- Services to private school children.
- Maintenance of effort.
- Comparability of services.
- Uses of federal funds to supplement and not supplant.

### **1. Federal Funds Allowed for Consolidation**

In general, ED guidance allows for a schoolwide building to consolidate federal funds it receives from discretionary (competitive) and formula grants, except where ED has expressed limitations. A schoolwide program that includes other federal education programs does not have to conform to the specific statutory or regulatory requirements for each separate program so long as the intent and purposes of those programs are met in the schoolwide plan.

### **2. Federal Funds with Limits or Conditions for Consolidation**

ED has placed limitations, or conditions, on consolidating the following federal funds:

- **Individuals with Disabilities Education Act (IDEA), Part B** (formula or discretionary grant programs under IDEA and funds provided for eligible children with disabilities under Section 8003(d) of the ESEA) may be included in a schoolwide; the amount of federal special education funds consolidated cannot exceed the per-child allocation for each of the children with disabilities participating in the schoolwide program. See OSPI

Bulletin No. 018-15 Use of Funds: Individuals with Disabilities Education Act (IDEA 2004), Part B.

- **Title I, Part C**-Education of Migratory Children (funds provided under ESEA, Title I, Part C to state agencies for services to migratory children). Title I, Part C, Migrant Education funds may be combined in a schoolwide program only after the LEA consults with parents and documents that it has met all identified student needs that result from a migratory lifestyle. In addition, any inclusion of Title I, Part C funding is contingent upon approval by the Office of Superintendent of Public Instruction's (OSPI's) Migrant Education office.

**Title II**-Preparing, training, and recruiting effective teachers, principals, or other school leaders

**Title III**- To ensure that limited English proficient (LEP) students, including immigrant children and youth, develop English proficiency and meet the same academic content and academic achievement standards that other children are expected to meet.

Funds are used to implement language instruction education programs designed to help LEP students achieve these standards.

- **Title VI, Part A**-Indian, Native Hawaiian, and Alaska Native (funds provided under ESEA, Title VI, Part A to local school districts for Indian Education services). Title VI, Part A, Indian Education funds may be combined in a schoolwide program as long as they are used to assist Indian students in meeting state academic standards and are approved by an appropriately constituted committee.

- **Perkins Vocational and Technical Education**. Perkins funds may be consolidated as long as the school is providing services from state and local funds that are at least comparable to the services being provided in other secondary schools or sites within the district that are not being served with Perkins funds.

### **3. Federal Funds Excluded from Consolidation**

The following federal funds are excluded from consolidation:

- Federal programs that are not awarded by ED, such as the **National School Lunch Program** and **Head Start**.
- Funds provided under the **School Facilities Infrastructure Improvement Act** to ensure the health and safety of students through the repair, renovation, alteration, and construction of school facilities.
- Programs under the **Adult Education Act of ESEA, Title IX, Part A, Subpart 3 (Adult Indians)** unless adult literacy services are integrated within a schoolwide program plan.

Adult education funds could be included, for example, if they provide adult literacy as part of a family literacy activity under a schoolwide program plan.

- The ED funds awarded to **institutions of higher education**, unless those funds support elementary or secondary schools (e.g., the School, College, and University Partnerships Program).

#### **4. State Funds Allowed for Consolidation**

The following state funds are the only funds that may be consolidated in a schoolwide program:

- State basic education allocations
- Levy Equalization (local effort assistance)
- Learning Assistance Program\* as long as it can be shown students served with LAP funds meet program eligibility criteria. LAP program reporting requirements still apply.

#### **5. State Funds Excluded From Consolidation**

All other state funds not listed above are excluded from consolidation, either because of program consideration or because they are entitlement funding, and must therefore follow the eligible students. OSPI is frequently asked about the following funds, which are not allowed:

- Transitional Bilingual Instructional Program funds
- State Special Education funds
- State Highly Capable funds
- Early Childhood Education and Assistance Program (ECEAP) funds.

#### **6. Local Funds & Consolidation**

Local levy revenue may be consolidated in schoolwide programs.

For a template on schoolwide consolidation of funds, refer to the to OSPI's Title I, Part A schoolwide website.