



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

Audit Services
Chicago/Kansas City Audit Region

March 15, 2007

Control Number ED-OIG/A05G0034

Dr. Suellen Reed
State Superintendent of Public Instruction
Indiana Department of Education
Room 229, State House
Indianapolis, IN 46204-2798

Dear Dr. Reed:

This **Final Audit Report**, titled *Indiana Schools' Implementation of Schoolwide Plans Under the No Child Left Behind Act of 2001*, presents the results of our audit. Our audit objectives were to determine whether (1) the Indiana Department of Education (IDE) and local educational agencies (LEAs)¹ had adequate processes in place to ensure that schoolwide schools had schoolwide plans that included all required elements and that these schools implemented their schoolwide plans, (2) schoolwide plans for selected schools included all required elements, and (3) the selected schools implemented the elements included in their schoolwide plans. Our audit covered the 2005-06 school year (July 1, 2005, through June 30, 2006).

BACKGROUND

The Elementary and Secondary Education Act of 1965, as amended by the No Child Left Behind Act of 2001 (the Act), allows schools in an area with a poverty level of 40 percent or more, or in which at least 40 percent of enrolled students are from low-income families, to operate schoolwide programs. Schools operating schoolwide programs may use funds from Title I, Part A, along with other federal, state, and local funds, to upgrade the entire educational program in a school in order to improve the academic achievement of all students, particularly the lowest-achieving students.

According to Section 1114(b)(2)(A) of the Act, 34 C.F.R § 200.26(b), and 34 C.F.R. § 200.27(a)(3),² the school must develop a comprehensive schoolwide plan in consultation with the LEA and its school support team or another technical assistance provider, and the school community. The comprehensive plan must be based on data from a comprehensive needs assessment or, for schools that have operated schoolwide programs for an extended period of time, based on the state's annual assessments and other indicators of academic achievement. The

¹ To test processes at LEAs, we reviewed Indianapolis Public Schools (Indianapolis) and the School City of East Chicago (East Chicago).

² All regulatory citations are as of July 1, 2005.

comprehensive plan must (1) describe how the school will implement the schoolwide program components listed under 34 C.F.R. § 200.28, (2) describe how the school will use resources to implement the schoolwide program components, (3) include a list of state educational agency, LEA, and other federal programs for which the school will consolidate funds to use in its schoolwide program, and (4) describe how the school will provide individual student academic assessment results to parents.

According to 34 C.F.R. § 200.28, a schoolwide program must contain the following components:³

- Schoolwide reform strategies that (1) provide opportunities for students to meet proficient and advanced state achievements standards; (2) use effective methods of instruction that are based on scientifically based research that strengthen the school's core academic program, provide an enriched and accelerated curriculum, increase the amount and quality of learning time, include strategies for meeting the educational needs of historically underserved populations, and are consistent with, and are designed to implement, state and local improvement plans; and (3) include strategies that address the needs of all the students in the school, particularly the needs of the lowest achieving students, and address how the school will determine if such needs have been met.
- Strategies to provide instruction by highly qualified teachers, including strategies to (1) attract highly qualified teachers; (2) provide high quality and ongoing professional development for teachers, principals, and paraprofessionals; (3) devote sufficient resources to carry out professional development activities; and (4) include teachers in professional development activities on the use of academic assessments.
- Strategies to involve parents in the planning, review, and improvement of the schoolwide program plan, including having a parental involvement policy for the school.⁴
- Activities to ensure that students who experience difficulty reaching proficient or advanced levels on academic assessments are provided with additional support.
- Plans for assisting preschool children in the transition from early childhood programs to the schoolwide program.

The U.S. Department of Education allocated approximately \$174 million in Title I funds to IDE for the 2005-06 school year. In Indiana, 160 schools operated schoolwide programs during both the 2004-05 and 2005-06 school years.

³ Section 1114(b)(1) of the Act contains these components.

⁴ Our review of parental involvement strategies focused only on strategies to involve parents in the planning, review, and improvement of the schoolwide program plan.

AUDIT RESULTS

We found that (1) IDE and the two LEAs we reviewed (Indianapolis and East Chicago) had adequate processes in place to ensure that schools implemented the elements included in their schoolwide plans but did not ensure that schoolwide plans included all required elements, (2) the two schools we reviewed did not include all required elements in their schoolwide plans, and (3) the two schools we reviewed implemented the elements included in their schoolwide plans.

Both of the schoolwide plans we reviewed included a description of how the school would use resources to implement components in its schoolwide program, schoolwide reform strategies, and strategies to provide additional support to low-achieving students. In addition, the schoolwide plan for the selected school in East Chicago included strategies to involve parents in the planning, review, and improvement of the schoolwide plan and plans for assisting preschool students in the transition from early childhood programs to the schoolwide program.⁵ However, schoolwide plans for the two selected schools did not include all required elements.

In its comments to the draft report, IDE concurred with our finding and recommendations. The comments are summarized at the end of the finding. The full text of IDE's comments on the draft report is included as an attachment to the report.

FINDING – IDE and Selected LEAs Did Not Ensure Schoolwide Plans Included All Required Elements

IDE and the LEAs we reviewed did not ensure that schoolwide plans included all elements required by Section 1114(b)(2)(A) of the Act. See the following table:

Schoolwide Plan Elements Included in Each Schoolwide Plan		
Required Element (See BACKGROUND Section)	Indianapolis LEA – John Marshall Middle School	East Chicago LEA- Eugene Field Elementary School
1) Components Listed Under 34 C.F.R. § 200.28:		
Schoolwide Reform Strategies	Yes	Yes
Instruction by Highly Qualified Teachers ⁶	No	No
Parental Involvement in Program Planning, Review, and Improvement	No	Yes
Additional Support	Yes	Yes
Transition For Preschool Students	NA	Yes
2) Resources to Implement Components	Yes	Yes
3) Consolidating Program Funds	NA ⁷	NA ⁷
4) Providing Academic Assessment Results to Parents	No	No

⁵ East Chicago's was the only elementary school we visited. Therefore, it was the only school required to include plans for assisting preschool students in the transition from early childhood programs to the schoolwide program.

⁶ In each case where a school failed to meet this requirement, the deficiency was that it did not have in its schoolwide plan a strategy to attract highly qualified teachers, which is required by Section 1114(b)(1)(E) of the Act and 34 C.F.R. § 200.28(b)(1).

⁷ A school is required to list the program funds it will consolidate in the schoolwide program only if it chooses to consolidate funds. Because the school did not consolidate funds, this element was not applicable.

Though the selected schools did not include all required elements in their schoolwide plans, we concluded that the LEAs had processes in place that ensured that the objectives referred to by the required elements were carried out by each selected school. In addition to implementing all elements included in their schoolwide plans, schools also implemented the elements not included in their schoolwide plans. Specifically, (1) both selected schools implemented strategies to provide instruction by highly qualified teachers and provided parents with individual student academic assessment results, and (2) the selected school in Indianapolis involved parents in the planning, review, and improvement of the schoolwide program.

According to Section 1114(b)(1) of the Act and 34 C.F.R. § 200.28, a schoolwide plan must include, among other things, strategies to provide instruction by highly qualified teachers and strategies to involve parents in the planning, review, and improvement of the schoolwide plan. In addition, Section 1114(b)(2)(A)(iv) of the Act and 34 C.F.R. § 200.28(c)(2)(ii) require a schoolwide plan to describe how a school will provide individual student academic assessment results to parents.

Prior to the 2005-06 school year, IDE did not have a process in place to monitor schoolwide plans. During the 2005-06 school year, IDE implemented both on-site and desk review monitoring of schoolwide plans. The monitoring checklists IDE used to review schoolwide plans covered some of the required schoolwide program components listed under 34 C.F.R. § 200.28 but did not include all elements required by Section 1114(b)(2)(A) of the Act and 34 C.F.R. § 200.27(a)(3). Specifically, the checklists did not list that schoolwide plans must (1) include a list of programs that will be consolidated under the schoolwide program, (2) describe how the school will provide individual student academic assessment results to parents, and (3) include strategies to involve parents in the planning, review, and improvement of the schoolwide plan. Thus, while IDE reviewed schoolwide plans, it did not review the plans to ensure that they included all required elements. In addition, the schoolwide plan guidance IDE provided to LEAs did not include these three required elements. IDE was not aware that the Act and implementing regulations required schoolwide plans to include these three elements.

IDE required schools to work with one of two state-approved technical assistance providers during the schoolwide planning process. The technical assistance providers certified to IDE that schoolwide plans for schools they worked with included all required components. IDE accepted the technical assistance providers' certifications without conducting its own review of the schoolwide plans. The selected school in East Chicago worked with a state-approved technical assistance provider while developing its 2005-06 schoolwide plan, and the provider certified that it included all required components. However, as explained above, the schoolwide plan for the selected school in East Chicago was deficient. Technical assistance providers might not be aware of all schoolwide plan requirements.

Not ensuring that schoolwide plans include all required elements could potentially lead to decreased implementation of required schoolwide plan elements and schoolwide plans that are less likely to improve the academic achievement of all students.

Recommendations

We recommend that the Assistant Secretary for Elementary and Secondary Education require IDE to

- 1.1 Ensure that both schools we reviewed revise their schoolwide plans to include all required elements;
- 1.2 Add the following required elements for schoolwide plans to its on-site and desk review monitoring checklists and to guidance provided to LEAs regarding schoolwide plans:
 - (a) include a list of programs that will be consolidated under the schoolwide program,
 - (b) describe how the school will provide individual student academic assessment results to parents, and
 - (c) include strategies to involve parents in the planning, review, and improvement of the schoolwide plan;
- 1.3 Notify LEAs of the changes to the guidance and advise them to take action as appropriate;
- 1.4 Review, during its on-site visits to LEAs and desk reviews of LEAs' documents, all elements of the LEAs' schoolwide plans to determine whether (a) each LEA's policies and procedures ensure that schoolwide plans include all the required elements, (b) those policies and procedures are being implemented, and (c) schoolwide plans include all required elements; and
- 1.5 Ensure that state-approved technical assistance providers are aware of all required elements for schoolwide plans.

Auditee Comments

IDE concurred with our finding and recommendations. In response to our recommendations, IDE

- Stated it will meet with the Title I Program Administrator, school staff, and technical assistance provider for both schools to ensure that schoolwide plans include all required elements.
- Provided (1) revised on-site and desk review monitoring checklists that include the elements listed in Recommendation 1.2; and (2) guidance addressed to LEA Title I Program Administrators, per Recommendation 1.3, that (a) lists programs that can be consolidated under a schoolwide plan and (b) informs them of the elements listed in Recommendation 1.2. IDE stated it will present this information to LEAs at future meetings and will post it on its website.
- Stated it will continue to review all elements of LEAs' schoolwide plans during on-site visits and desk reviews.
- Stated it has met with each of the four state-approved technical assistance providers and reviewed required elements of schoolwide plans and IDE's on-site and desk review checklists.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our audit objectives were to determine whether (1) IDE and LEAs had adequate processes in place to ensure that schoolwide schools had schoolwide plans that included all required elements and that these schools implemented their schoolwide plans, (2) schoolwide plans for selected schools included all required elements, and (3) the selected schools implemented the elements included in their schoolwide plans. Our audit covered the 2005-06 school year (July 1, 2005, through June 30, 2006).

To achieve our objectives, we interviewed officials and reviewed documents from IDE and the two LEAs and schools we reviewed. For IDE, we (1) gained an understanding of policies and procedures for ensuring that schoolwide plans included all required elements and were being implemented and (2) reviewed guidance it provided to LEAs and schools regarding schoolwide plans. For the two LEAs selected, we gained an understanding of how each LEA (1) helped its schools develop and implement schoolwide plans and (2) monitored and evaluated schoolwide plans. The documents we reviewed included

1. IDE's organizational chart;
2. Prior audit reports, including IDE's Single Audit Act report, *State of Indiana Single Audit Report, July 1, 2003, to June 30, 2004*;
3. Guidance regarding schoolwide programs IDE provided to LEAs at various meetings, including its Title I meetings held in Fall 2005 and Spring 2006 and Title I New Program Administrator Workshops held on January 10, 2006, and June 1, 2006;
4. Documentation related to IDE's monitoring reviews of LEAs and schools, including its on-site and desk review monitoring checklists, and on-site monitoring reports;
5. Schoolwide plans for the two selected schools for inclusion of the required elements listed in Section 1114(b)(2)(A) of the Act and 34 C.F.R. § 200.27(a)(3), including the components listed in 34 C.F.R. § 200.28; and
6. Documentation for the two selected schools related to the implementation of required schoolwide plan elements.

We selected LEAs and schools to visit. We identified the universe of LEAs in Indiana that had at least one school (1) identified for improvement or otherwise showing weak academic results for the 2005-06 school year and (2) that operated a schoolwide program during both the 2004-05 and 2005-06 school years. By including only those schools that operated schoolwide programs during both of these school years, we ensured that our review included only schools that had schoolwide programs at the time of our review and had completed one full year of their schoolwide programs. From this universe of 18 LEAs, we judgmentally selected the 2 LEAs we reviewed. Based on Title I allocations, we selected one large LEA (Indianapolis) and one medium LEA (East Chicago). For each of these two LEAs, we randomly selected one school meeting requirements (1) and (2) above. We randomly selected one of seven schools in Indianapolis and one of three schools in East Chicago. For Indianapolis and East Chicago, we selected John Marshall Middle School and Eugene Field Elementary School, respectively.

We performed our fieldwork at the offices of IDE in Indianapolis, Indiana; the two selected LEAs and schools in Indiana; and our offices in Chicago, Illinois, and Kansas City, Missouri.

We discussed the results of our audit with IDE officials on December 20, 2006. We did not use computer-processed data to achieve our audit objectives. Our audit was performed in accordance with generally accepted government auditing standards appropriate to the scope of review described above.

ADMINISTRATIVE MATTERS

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. Determinations of corrective action to be taken will be made by the appropriate Department of Education officials.

If you have any additional comments or information that you believe may have a bearing on the resolution of this audit, you should send them directly to the following Education Department official, who will consider them before taking final Departmental action on this audit:

Kerri L. Briggs
Acting Assistant Secretary
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

It is the policy of the U.S. Department of Education to expedite the resolution of audits by initiating timely action on the findings and recommendations contained therein. Therefore, receipt of your comments within 30 days would be appreciated.

In accordance with the Freedom of Information Act (5 U.S.C. § 552), reports issued by the Office of Inspector General are available to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

Sincerely,



Richard J. Dowd
Regional Inspector General
for Audit

Attachment

ATTACHMENT: IDE Comments to the Draft Report

[Auditor's Note: The hardcopy version of this letter had the IDE letterhead at the top of this page.]

February 15, 2007

Richard J. Dowd
Regional Inspector General for Audit
500 West Madison Street, Suite 1414
Chicago, Illinois 60661

Dear Mr. Dowd:

This letter is written in response to the January 17, 2007 Office of Inspector General (OIG) Draft Audit Report titled: *Indiana Schools' Implementation of Schoolwide Plans Under the No Child Left Behind Act of 2001*. The audit covered the 2005-06 school year and findings were based on the IDOE's program administration and OIG site visits to schoolwide programs operating in Indianapolis Public Schools and the School City of East Chicago.

Indiana Department of Education (IDOE) staff has reviewed the findings contained in the OIG draft report and concurs with its findings. To demonstrate full compliance with federal laws and regulations, the IDOE has taken the following corrective action in response to the specific OIG audit finding and the resultant five OIG recommendations delineated below.

OIG Finding: IDE and Selected LEAs Did Not Ensure Schoolwide Plans Included All Required Elements

OIG Recommendation #1: Ensure that both schools we reviewed revise their schoolwide plans to include all required elements.

IDOE Response: IDOE staff will meet with the Title I Program Administrator, school staff, and the technical assistance provider to review the revised schoolwide plans to ensure that all components are now included. This review will be completed for both schools by March 23, 2007.

OIG Recommendation #2: Add the following required elements for schoolwide plans to its on-site and desk review monitoring checklists and to guidance provided to LEAs regarding schoolwide plans: (a) include a list of programs that will be consolidated under the schoolwide programs, (b) describe how the school will provide individual student academic assessment results to parents, and (c) include strategies to involve parents in the planning, review, and improvement of the schoolwide plan.

IDOE Response: IDOE has created a list of programs that can be consolidated under the schoolwide plan. (See Attachment A) IDOE's on-site and desk review monitoring

checklists have been revised to include the elements listed in Recommendation #2. (See Attachments B and C)

OIG Recommendation #3: Notify LEAs of the changes to the guidance and advise them to take action as appropriate.

IDOE Response: IDOE notified LEAs of the changes to the guidance and advised them to take action as appropriate on February 14, 2007. (See Attachment D) In addition, this information will be presented during a PowerPoint presentation to all districts at the Title I Administrative Meeting on February 26 and 27, 2007. All documents also will be posted on Indiana's Title I web site. Schools interested in participating in the 2007-08 schoolwide planning process will be advised of the guidance at an April 2007 meeting conducted by the IDOE.

OIG Recommendation #4: Review, during its on-site visits to LEAs and desk reviews of LEAs' documents, all elements of the LEAs' schoolwide plans to determine whether (a) each LEA's policies and procedures ensure that schoolwide plans include all the required elements, (b) those policies and procedures are being implemented, and (c) schoolwide plans include all required elements.

IDOE Response: IDOE will continue to review, during on-site visits to LEAs and through desk reviews of LEA documents, all elements of the LEAs' schoolwide plans. IDOE conducts approximately three on-site monitoring reviews monthly. Within a three year cycle, all districts with schoolwide programs participate in an IDOE desk review monitoring process requiring documentation to support the district's implementation of all required program elements.

OIG Recommendation #5: Ensure that state-approved technical assistance providers are aware of all required elements for schoolwide plans.

IDOE Response: IDOE met with each of the four state-approved technical assistance providers and reviewed required elements for schoolwide plans as well as IDOE's on-site and desk review checklists.

If additional documentation is needed to support the IDOE's full compliance with the required elements of schoolwide programs, please do not hesitate to contact Linda Miller, assistant superintendent, at lmiller@doe.state.in.us or by telephone at (317) 232-0519.

Sincerely,

/s/

Dr. Suellen Reed
State Superintendent of Public Instruction

Cc: Linda Miller, Assistant Superintendent, IDOE
Lee Ann Kwiatkowski, Director of Title I, IDOE

Attachment A Consolidation of Funds in Schoolwide Programs

DRAFT

Why should schoolwide programs consolidate funds?

- Allows school administrators and instructional staff to focus on implementing strategies identified in the schoolwide plan and improving the overall academic performance of the school.
- Removes barriers created by having separate academic programs.
- Greater flexibility to meet the needs of all students and families.
- Consolidates funds without requiring separate fiscal accounting records by program.
- Eliminates the need for monthly time and attendance logs from staff that work on a single cost objective.

Which Federal education program funds can be consolidated in a schoolwide program?

- Title I, Part A Improving the Academic Achievement of the Disadvantaged
- Title I, Part D, Subpart 2 Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk.
- Title II, Part A Improving Teacher Quality
- Title II, Part D Enhancing Education Through Technology
- Title III Limited English Proficient
- Title IV, Part A Safe and Drug Free Schools and Communities
- Title V Innovative Programs
- Title VI Rural and Low Income Schools
- Funds received from discretionary (competitive) grants, such as Even Start
- State and local funds

Which Federal education program funds can not be included or have restrictions?

- Migrant Education Program Funds
 - Restrictions:**
 - School must consult with the parents of migratory children or organizations representing these parents, or both.
 - School must 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.
 - School must document that services to address those needs have been provided.
- Indian Education Program, Title VII, Part A, section 7115
 - Restrictions:**

-The parent committee established under that program must approve the use of the funds for the schoolwide program.

-The schoolwide program must be consistent with the purposes of the Indian Education Program

- IDEA funds

- Restrictions:**

- The amount of funds consolidated may not exceed the amount received under IDEA, Part B for that fiscal year, divided by the number of children with disabilities in the jurisdiction of the LEA and multiplied by the number of children with disabilities participating in the schoolwide program.

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

- Title I, Part B, Subpart 1 Reading First is **excluded** from consolidation.

In addition to restrictions listed, schoolwide programs must still meet program requirements relating to:

- Health and safety requirements
- Civil rights
- Gender equity
- Student and parental participation and involvement
- Services to private school children
- Comparability of services
- Maintenance of effort
- Use of federal funds to supplement, not supplant non-federal funds

Procedures for Consolidating Schoolwide Funds

(In progress)

1. Determine the amount of federal funds to be allocated to each of the schoolwide schools from all participating federal grants.

2. Develop a consolidated budget for each schoolwide school. The budget should support the school's plan and the goals, objectives, and strategies needed to implement the plan.

3. Record the budget for each schoolwide school in the accounting records of the school district. Fund 400, Schoolwide Programs Fund, should be created for recording the expenditures of all schoolwide schools.

4. Allocate the consolidated monthly expenditures from Fund 400 to the individual federal funds through posting a monthly journal entry using account _____ for each school.

Attachment B



2006-2007
ON-SITE
Monitoring

No Child Left Behind (NCLB)

The IDOE Review Team will complete this document as a record of the On-Site Review of Title I, Part A programs. It details the findings of the Review Team regarding the key focus areas identified in this protocol. If any areas are found to be in partial compliance or out of compliance, a finding will be listed on the report generated by the team from the IDOE. This report will be completed within 30 business days of the visit to the LEA.

LEA Name:

Date of Visit:

IDOE Team Members:

LEA Personnel: Superintendent: _____

Program Administrator: _____

Other:

Monitoring 6: Compliance with schoolwide program requirements. Section: 1114 and 34CFR Secs. 200.26-28

Evidence at LEA/School	YES	NO	Comments
1. Show evidence that LEA provides guidance to schools about the development, implementation, and evaluation of schoolwide programs and program requirements <ul style="list-style-type: none"> <input type="checkbox"/> Agendas, minutes, sign-in sheets for any meetings <input type="checkbox"/> Copies of any kind of evaluation used <input type="checkbox"/> Copies of notices of information 			
2. Show evidence that LEA provides technical assistance and support to schools developing schoolwide programs in the areas of needs assessment, comprehensive planning, implementation, and evaluation <ul style="list-style-type: none"> <input type="checkbox"/> PA's participation in the SWP training provided by one of the providers approved by the IDOE <input type="checkbox"/> Records of attendance at school meetings to implement schoolwide programs 			
3. Show evidence that schoolwide programs are comprehensively developed, reviewed and evaluated annually, and revised accordingly <ul style="list-style-type: none"> <input type="checkbox"/> Discussion of the process <input type="checkbox"/> Copies of plans and revisions 			
4. Explain how the district consolidates funds and, if so; how those funds are accounted for <ul style="list-style-type: none"> <input type="checkbox"/> Ledger, worksheets, other 			
5. Show evidence that services students receive are supplementary to instructional services required to be provided by the school <ul style="list-style-type: none"> <input type="checkbox"/> Evidence in description of program – Review Program 			
6. Show evidence that the SWP is being implemented in the school <ul style="list-style-type: none"> <input type="checkbox"/> Strategies in plan match application <input type="checkbox"/> Teacher interviews and classroom observation <input type="checkbox"/> Surveys <input type="checkbox"/> Schedules of extended-time activities 			

Topic 6: Continued

Evidence at the School Level	YES	NO	Comments
Schoolwide Plan Components:			
1. A comprehensive needs assessment of the whole school			
2. Implementation of schoolwide reform strategies that: <ul style="list-style-type: none"> <input type="checkbox"/> Provide opportunities for all children to meet proficient and advanced levels of student academic achievement <input type="checkbox"/> Use effective methods and instructional strategies that are based on scientifically based research that strengthens the core academic program <input type="checkbox"/> Increases the amount of learning time <input type="checkbox"/> Includes strategies for serving underserved populations <input type="checkbox"/> Includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting state standards <input type="checkbox"/> Address how the school will determine if those needs of the children have been met <input type="checkbox"/> Are consistent with and are designed to implement state and local improvement plans, if any 			
3. Highly qualified teachers in all core content area classes			
4. High quality and on-going professional development for teachers, principals, and paraprofessionals			
5. Strategies to attract high-quality, highly qualified teachers to this school			
6. Strategies to increase parental involvement, such as literacy services			
6a. Description how the school will provide individual academic assessment results to parents			
6b. Strategies to involve parents in the planning, review, and improvement of the schoolwide plan			
7. Plans for assisting preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or a state-run preschool program			
8. Opportunities and expectations for teachers to be included in the decision making related to the use of academic assessment results leading to the improvement of student achievement			
9. Activities and programs at the school level to ensure that students having difficulty mastering proficient and advanced levels of the academic achievement are provided with effective, timely additional assistance			
10. Coordination and integration of federal, state and local funds; and resources such as in-kind services and program components			
10a. List of programs that will be consolidated under the schoolwide plan (if applicable)			

Attachment C

**Title I Schoolwide Plan Checklist**

Directions: Review the Title I Schoolwide Plans prior to mailing to the IDOE to ensure that all requirements listed below have been met. Insert the page number where each component can be found in the column to the right. If a plan does not include all ten components, it is out of compliance with NCLB requirements and will need to be adjusted.

Schoolwide Plan: Section 1114 (b) (2) Any school that operates a schoolwide program shall first develop (or amend a plan for such a program that was in existence on the day before the date of enactment of the NCLB Act of 2001), in consultation with the LEA and its school support team or other technical assistance provider under section 1117, a comprehensive plan for reforming the total instructional program in the school that:

- i. Describes how the school will implement the components described below
- ii. Describes how the school will use resources under this part and other sources to implement the components
- iii. Includes a list of SEA programs and other federal programs that will be consolidated in the schoolwide program
- iv. Describes how the school will provide individual student academic assessment results in a language the parents can understand, including an interpretation of those results, to the parents of a child who participates in the academic assessments required by the SEA plan.

Components of a Schoolwide Plan*:	Found on Page #:
1. A comprehensive needs assessment of the whole school	
2. Implementation of schoolwide reform strategies that: <ul style="list-style-type: none"> <input type="checkbox"/> Provide opportunities for all children to meet proficient and advanced levels of student academic achievement <input type="checkbox"/> Use effective methods and instructional strategies that are based on scientifically based research that: <ul style="list-style-type: none"> <input type="checkbox"/> Strengthens the core academic program <input type="checkbox"/> Increases the amount of learning time <input type="checkbox"/> Includes strategies for serving underserved populations <input type="checkbox"/> Includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting state standards <input type="checkbox"/> Address how the school will determine if those needs of the children have been met <input type="checkbox"/> Are consistent with and are designed to implement state and local improvement plans, if any 	
3. Highly qualified teachers in all core content area classes	
4. High quality and on-going professional development for teachers, principals, and paraprofessionals	
5. Strategies to attract high-quality, highly qualified teachers to this school	
6. Strategies to increase parental involvement, such as literary services	
6 a. Description how the school will provide individual academic assessment results to parents	
6 b. Strategies to involve parents in the planning, review, and improvement of the schoolwide plan	
7. Plans for assisting preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or a state-run preschool program	
8. Opportunities and expectations for teachers to be included in the decision making related to the use of academic assessment results leading to the improvement of student achievement	
9. Activities and programs at the school level to ensure that students having difficulty mastering proficient and advanced levels of the academic achievement are provided with effective, timely additional assistance	
10. Coordination and integration of federal, state and local funds; and resources such as in-kind services and program components	
10 a. A list of programs that will be consolidated under the schoolwide plan (if applicable)	

*Consolidated plans are encouraged and accepted

Attachment D

MEMORANDUM

To: Title I Program Administrators

From: Lee Ann Kwiatkowski, Director
Division of Compensatory Education

Re: Schoolwide Programs

Date: February 14, 2007

This memorandum is to inform you of recent updated federal guidance for schoolwide programs and how that will affect the Title I monitoring system. As you know, schoolwide programs have the flexibility to consolidate certain funding sources while still maintaining the intent and purpose of Title I. The funding sources that may be consolidated without restrictions are as follows:

- Title I, Part A Improving the Academic Achievement of the Disadvantaged
- Title I, Part D, Subpart 2 Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk.
- Title II, Part A Improving Teacher Quality
- Title II, Part D Enhancing Education Through Technology
- Title III Limited English Proficient
- Title IV, Part A Safe and Drug Free Schools and Communities
- Title V Innovative Programs
- Title VI Rural and Low Income Schools
- Funds received from discretionary (competitive) grants, such as Even Start
- State and local dollars

The following funding sources may be consolidated, **with restrictions**.

- Migrant Education Program Funds
- Indian Education Program, Title VII, Part A, section 7115
- IDEA funds

Please refer to U.S. Department of Education Non-Regulatory Guidance for more information on these restrictions, at http://www.doe.state.in.us/TitleI/pdf/nrg_fiscalguid.pdf. Our office is also currently working on a fiscal handbook to assist in procedures related to consolidating funds in schoolwide programs.

Based on recent guidance from the Office of the Inspector General, we must ensure that schoolwide programs have additional information outlined within the schoolwide plan.

The additional components are: (1) a description of how the school will provide individual academic assessment results to parents; (2) strategies to involve parents in the planning, review, and improvement of the schoolwide plan; and (3) list of programs that will be consolidated under the schoolwide plan (if applicable). We will look for these components in both cycle and on-site monitoring of districts with schoolwide programs.

If you have questions or concerns regarding schoolwide programs, please contact our office at 317-232-0540 or Toll Free at 877-418-7240.