



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

JUL 30 2004

Leigh M. Manasevit  
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3 105 South Street, NW  
Washington, DC 20007

Dear Mr. Manasevit:

This is in response to your letter requesting clarification on setting aside and tracking Title I, Part A funds for school improvement and parental involvement activities in schoolwide program schools.

*Question 1. In general, a school identified for school improvement must develop or revise a school plan—see § 1116(b)(3). The plan must include an assurance the school will spend at least 10% of its Title I, Part A allocation on professional development. If a schoolwide program school is identified for school improvement, must it develop a school plan? Must the school set aside and separately track 10% of its Title I, Part A allocation for professional development?*

Response: A schoolwide program school must develop a schoolwide program plan whether or not it is in need of improvement. A schoolwide program school in need of improvement must modify its schoolwide plan to address the issues that put it in improvement.--i. e., implement the 1116(b)(3) plan requirements. The school must be able to demonstrate that it has spent an amount equal to 10% of its Title I allocation on professional development. This amount does not have to be taken from Title I funds, however, in keeping with the authority to combine funds.

*Question 2. An LEA must reserve at least 1% of its Title I, Part A allocation for parental involvement. At least 95% of the reservation must be distributed to schools served under Part A. Schools are required to spend these reserved funds on parental involvement activities—see § 1118(a)(3). Must a schoolwide program school separately track these Title I, Part A funds to parental involvement activities? Must the school provide the specific parental involvement activities specified in the statute and regulations, or may it meet the intent and purposes of the parental involvement requirements?*

Response: A schoolwide program school must demonstrate that it has provided parental involvement activities consistent with section 1118. It must also document that these activities consumed, at a minimum, an amount equal to the amount of Title I parent involvement funds (if any) the school received from the LEA (presuming that most LEAs divide 95% of the 1% equally among all Title I schools). The parent involvement activities do not need to be provided with Title I funds, consistent with the authority to

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combine funds in schoolwide programs. However, a schoolwide program school must meet these requirements (not simply intent and purposes) because they apply to Title I schools.

I hope that these responses provide sufficient clarification of the issues presented. Feel free to contact me should you require further assistance.

Sincerely,

A handwritten signature in black ink that reads "Raymond Simon". The signature is written in a cursive style with a large, stylized initial 'R'.

Raymond Simon