THE CENTER ON
SCHOOL
TURNAROUND
WestEd

SUPPORT FOR RAPID SCHOOL IMPROVEMENT:

How Federal Dollars Can Be Leveraged for Systemic Improvement

Melissa Junge and Sheara Krvaric, Federal Education Group, PLLC

With a foreword by Carlas McCauley,
Director of the Center on School Turnaround

The Center on
School Turnaround
FOUR
DOMAINS
Series

About the Center on School Turnaround at WestEd (CST). The CST is one of 7 national Content Centers in a federal network of 22 Comprehensive Centers. The U.S. Department of Education charges the centers with building the capacity of state education agencies (SEAs) to assist districts and schools in meeting student achievement goals. The goal of the CST is to provide technical assistance and to identify, synthesize, and disseminate research-based practices and emerging promising practices that will lead to the increased capacity of SEAs to support districts in turning around their lowest-performing schools. The CST is a partnership of WestEd and the Academic Development Institute, the Darden/Curry Partnership for Leaders in Education at the University of Virginia, and the National Implementation Research Network.

http://centeronschoolturnaround.org

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Foreword

Much has been learned over decades of efforts to improve schools. While early reform efforts have focused on increasing the rigor of instruction, raising graduation rates, and improving academic achievement, many reform efforts have been implemented in isolation and have generally lacked a cohesive strategy. These earlier efforts tended to focus on individual areas of improvement and have lacked a systems approach, and thus success was not sustainable. The education community has learned the importance of considering all levels of the education system, understanding that the system within which a school operates — encompassing both the district and the state education system — can either bolster or stall rapid improvement.

To support systemic thinking about school improvement, the Center on School Turnaround at WestEd developed a framework entitled *Four Domains for Rapid School Improvement.* The framework is designed to assist states, districts, and schools in leading and managing rapid school improvement efforts. As states and local education agencies begin to develop and implement a theory of action that is guided by such a framework, it is important that they also align their spending to support implementation of their improvement efforts.

This document has been created to serve as a guide for the purpose of aligning spending to support turnaround efforts. This guide offers examples of how federal funds may be used to support a framework designed to produce a coherent strategy for turnaround.

This guide was developed under the auspices of the Center on School Turnaround and authored by Melissa Junge and Sheara Krvaric of the Federal Education Group, PLLC (FEG). FEG is a law and consulting firm that helps clients navigate federal rules and take action to improve student outcomes. The firm helps states, school districts, and other educational organizations find flexibilities so they can use federal money and requirements to achieve their goals in a way that maintains compliance. FEG provides legal and strategic advice, draft guidance, decision points, written analysis and opinions, briefing papers, compliance counseling, and trainings on all major K–12 federal education programs, including the Every Student Succeeds Act (ESSA), the Individuals with Disabilities Education Act (IDEA), and Perkins.

Of course, efforts to support a coherent strategy should go beyond aligning only federal sources of funds. States and districts should also maximize their local funds to better support a coherent vision. Aligning vision, structure, and resources may provide the best opportunity for sustainable improvement to occur.

— Carlas McCauley (Director, Center on School Turnaround)

Introduction

This guide delves into often-overlooked federal funding sources that can be used to support local efforts to pursue rapid turnaround. Although focused on spending at the district and school levels, this guide is appropriate for those involved in school improvement at the state, district, or school level because policies and procedures at all those levels impact how funds are spent at the local level. The guide builds on *Four Domains for Rapid School Improvement: A Systems Framework*, created by the Center on School Turnaround at WestEd to assist states, districts, and schools in leading and managing rapid school improvement efforts.[1] The framework identifies four areas of focus that research and experience suggest are central to rapid and significant improvement. It also includes examples of practices, in each of these four areas, that can be put into action at the state, district, and school levels.

Four Domains for Rapid School Improvement

Domain 1: Turnaround Leadership

Practice 1A: Prioritize improvement and communicate its urgency

Practice 1B: Monitor short- and long-term goals

Practice 1C: Customize and target support to meet needs

Domain 2: Talent Development

Practice 2A: Recruit, develop, retain, and sustain talent

Practice 2B: Target professional learning opportunities

Practice 2C: Set clear performance expectations

Domain 3: Instructional Transformation

Practice 3A: Diagnose and respond to student learning needs

Practice 3B: Provide rigorous evidence-based instruction

Practice 3C: Remove barriers and provide opportunities

Domain 4: Culture Shift

Practice 4A: Build a strong community intensely focused on student learning

Practice 4B: Solicit and act upon stakeholder input

Practice 4C: Engage students and families in pursuing education goals

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[1] The Center on School Turnaround. (2017). *Four domains for rapid school improvement: A systems framework* [The Center for School Turnaround at WestEd]. San Francisco, CA: WestEd. Available at http://centeronschoolturnaround.org/four-domains/

Districts and schools can support these four domains and related practices by using funds from U.S. Department of Education (ED) grant programs. This guide focuses on three grant programs in particular that provide significant federal funding for elementary and secondary schools but are often overlooked as sources of support for school improvement initiatives:

- Title I Part A of the Every Student Succeeds Act (ESSA)[2]

- Title II Part A of ESSA

- Part B of the Individuals with Disabilities Education Act (IDEA)[3]

Importantly, ESSA made several changes to these grant programs to facilitate spending on school improvement. These changes present states, districts, and schools with an opportunity to rethink how resources are deployed to support improvement efforts.

This guide addresses the funding available to districts and schools, but each level of the education system has a role to play in ensuring these funds are spent effectively. For example:

- **States** are responsible for awarding Title I Part A, Title II Part A, and IDEA Part B funds to school districts. States are also responsible for ensuring that districts spend funds appropriately and comply with federal grant-related requirements. Accordingly, states have authority to set policies that affect local spending of ESSA and IDEA funds.[4]

- **Districts** are responsible for spending Title I Part A, Title II Part A, and IDEA Part B funds in necessary and reasonable ways to meet federal program objectives.[5] When spending federal funds, districts must comply with federal grant-related requirements.

- **Schools** that receive federal funds (such as Title I Part A funds) share the district's responsibility to spend the funds appropriately and in compliance with federal

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[2] ESSA is the most recent reauthorization of the Elementary and Secondary Education Act (ESEA). Previously, ESEA was known as the No Child Left Behind Act (NCLB). This guide uses the term "ESSA" to refer to the current law. Every Student Succeeds Act of 2015 (ESSA), Pub. L. No. 114-95 § 114 Stat. 1177 (2015–2016). Available at https://congress.gov/114/plaws/publ95/PLAW-114publ95.pdf

[3] This guide does not address Section (§) 1003 funds under ESSA. Although these funds are often seen as the primary source of ED funding for school improvement, substantial funding to complement § 1003 efforts can be provided by Title I Part A, Title II Part A, and IDEA Part B, which are the focus of this guide.

[4] Council of Chief State School Officers. (2017). *A guide to state educational agency oversight responsibilities under ESSA: The role of the state in the local implementation of ESSA programs*. Available at https://www.ccsso.org/sites/default/files/2017-10/CCSSO_State_Authority_Over_ESSA_Programs.pdf

[5] The term "necessary and reasonable" comes from federal regulations known as the Uniform Grant Guidance. See the Code of Federal Regulations (CFR), specifically 2 CFR § 200.403 [https://www.ecfr.gov/cgi-bin/text-idx?SID=09aeeb09634596cb5b1c368cdcb80a28&mc=true&node=se2.1.200_1403&rgn=div8] and 2 CFR § 200.404 [https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=09aeeb09634596cb5b1c368cdcb80a28&mc=true&r=SECTION&n=se2.1.200_1404]. In general, spending is considered necessary and reasonable if an objective observer would understand the decision to spend funds on a good, service, or activity, considering the amount of money being spent, the needs of the program, and other relevant circumstances. Factors to consider include whether the spending is needed to carry out the grant program properly and efficiently; whether the district followed sound business practices; how much the good, service, or activity costs and whether the cost is consistent with market prices; whether the district decision-makers acted prudently in terms of their responsibilities to the district, its students, the public, and the federal government; and whether the district generally followed its internal practices and policies.

grant-related requirements. In some cases, federal law requires schools to develop school-level plans that guide federal grant spending.

This guide is organized as follows:

- **Section I** highlights three ways ESSA facilitates spending on school improvement initiatives.

- **Section II** provides an overview of spending rules that apply to all federal grants, and summarizes the Title I Part A, Title II Part A, and IDEA Part B programs.

- **Section III** gives examples of how districts and schools can use Title I Part A, Title II Part A, and IDEA Part B funds to support the four domains for rapid school improvement.

Section I. Three Ways ESSA Facilitates Spending on School Improvement

The Every Student Succeeds Act (ESSA) is the most recent version of the Elementary and Secondary Education Act (ESEA). It was signed into law on December 10, 2015, and went into effect for the programs covered in this guide on July 1, 2017. While ESSA made many changes to ESEA, there are three primary ways in which ESSA facilitates district and school spending on school improvement activities:

- Increased clarity on Title I Part A spending options

- Revised Title I Part A "supplement not supplant" test, which should facilitate school improvement spending options in Title I schools

- Expanded spending options and a continued emphasis on coordinating multiple funding streams to accomplish educational goals

Each of these points is discussed in the following sections.

A. Clarity on Title I Part A Spending Options

Title I Part A is ED's largest elementary and secondary education program. Title I Part A can play an important role in school improvement, but confusion over the allowable uses of Part A funds has limited spending in the past.[6] ESSA now clarifies that districts and schools can design Title I Part A programs, and can therefore use Title I Part A funds, to provide a well-rounded education to Title I students through a variety of academic and nonacademic supports.

Title I schools have different program design and spending options depending on whether they operate schoolwide or targeted assistance programs.

In a *schoolwide program*, all students are considered to be Title I students, meaning that all students in such schools can benefit from Title I services and the school can use Title I funds to upgrade its entire educational program. A Title I school may operate a schoolwide program model if:

- It meets the 40-percent poverty threshold, or

- It receives a waiver of the poverty threshold from its state education agency (SEA).[7]

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[6] Council of Chief State School Officers. (2016). *Maximizing ESSA formula funds for students: State readiness self-assessment* (p. 5), Washington, DC: Author. Available at https://www.ccsso.org/sites/default/files/2017-10/MaximizingESSAFormulaFundsforStudentsApril2016.pdf

[7] ESSA § 1114(a)(1). SEAs have the authority to waive the 40-percent poverty threshold after taking into account how a schoolwide program will best serve the needs of the students served by Title I in improving academic achievement and other factors.

In a schoolwide program, Title I services can include any of the following:

- 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

- Counseling, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students' skills outside the academic subject areas

- Preparation for and awareness of opportunities for postsecondary education and the workforce, which may include providing career and technical education programs or broadening secondary school students' access to coursework to earn postsecondary credit while still in high school, such as with Advanced Placement (AP), International Baccalaureate (IB), dual or concurrent enrollment, or early college high schools

- Implementation of a schoolwide tiered model to prevent and address problem behavior and provide early intervening services, coordinated with similar activities and services carried out under IDEA

- Professional development and other activities for teachers, paraprofessionals, and other school personnel to improve instruction and use of data and for recruitment and retention of effective teachers, particularly in high-need subjects

- Strategies for assisting preschool children in the transition from early childhood education to elementary school

- Preschool programs[8]

In a *targeted assistance program*, only certain students are considered to be Title I students. Schools that operate targeted assistance programs must identify specific students to serve from among the following groups of Title I–eligible students:

- Students who are struggling to meet state academic standards

- Students who participated in certain federally funded preschool programs

- Students who received services under the Migrant Education Program

- Students who are in a local institution for neglected or delinquent children or are attending a community day program

- Students who are experiencing homelessness

Only identified students may benefit from Title I services. (Students can be identified as Title I students even if they also receive services through another federal program, such as IDEA.)

In a targeted assistance program, Title I services can include any of the following:

- Expanded learning time for Title I students, including before- and after-school programs, and summer programs and opportunities

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[8] ESSA § 1114(b)(7).

- Early intervening services for Title I students, including services coordinated with similar activities and services carried out under IDEA

- Extra supports for Title I students, aligned to the school's regular education program, which may include services to assist preschool children in the transition from early childhood education programs to elementary school programs

- Professional development for teachers, principals, other school leaders, paraprofessionals, and, if appropriate, specialized instructional support personnel and other school personnel who work with Title I students

- Strategies to increase the involvement of parents of Title I students

- Dual- or concurrent-enrollment program services to Title I students who are identified as having the greatest need for special assistance

- In certain circumstances, health, nutrition, and other social services that are not otherwise available to Title I students

- Preschool services for Title I students[9]

See Section II.B.2 of this guide for more information.

B. Revised Title I Part A "Supplement Not Supplant" Test

Title I Part A has a "supplement not supplant" (SNS) requirement. In general terms, this requirement means that Title I Part A funds should add to (supplement) and not replace (supplant) state and local funds.

Prior to ESSA, SNS compliance was typically tested by verifying that each item charged to Title I was supplemental. This verification involved applying three presumptions of supplanting to each cost supported with Title I Part A funds.[10] These presumptions were complicated to apply in practice, which often made it hard to use Title I funds to support comprehensive initiatives like school improvement.

Under ESSA, individual Title I costs will no longer be used to test SNS compliance under Title I Part A.[11] As a result, the three presumptions no longer apply.

Instead, districts must demonstrate that the method[12] they use to allocate state and local funds to schools provides each Title I school with all of the state and local funds it would receive if it did not participate in the Title I program.[13]

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[9] ESSA § 1115(b)(2).

[10] Under NCLB and previous versions of ESEA, a Title I supplanting violation was presumed if Title I Part A paid for (1) an activity required by federal, state, or local law; (2) an activity that was paid for with state or local funds in the prior year; or (3) the same services for Title I students that state and local funds support for non–Title I students.

[11] ESSA § 1118(b)(3)(A).

[12] ESSA uses the term "methodology," which is not defined in the law. However, a Senate committee report describing the revised SNS test says a methodology is SNS compliant if a district "can document that the manner in which [it] allocate[s] State and local resources to schools is 'Title I neutral,' or that the methodology does not account for the Title I funds that schools will receive" (U.S. Senate, S. Rep. 114–231 (2016), p. 35, available at https://www.congress.gov/114/crpt/srpt231/CRPT-114srpt231.pdf).

[13] ESSA § 1118(b)(2).

In other words, the ESSA test looks at *how* each district allocates state and local funds (or state- and locally funded resources) to schools to ensure that the district does not deprive Title I schools of funds or resources *because they participate in Title I*. For example, if a district typically allocates one librarian staff position to each of its elementary schools, it cannot deprive a Title I school of that position on the basis that the school has Title I funds available to pay for it.[14]

Because districts and schools will no longer have to demonstrate that each individual cost charged to Title I Part A is supplemental, it should be easier to use Title I Part A funds to help support comprehensive activities, including school improvement efforts. Nonetheless, all costs charged to Title I must still be allowable under the program, must still support eligible students, and must comply with other spending rules described in Section II of this guide.

C. Expanded Spending Options and Continued Emphasis on Coordination Across Programs

As described in Section III of this guide, many of the practices of the four domains can be supported with federal funds. These possibilities are due in part to ESSA's expanded spending options.

In addition, ESSA continues to encourage districts and schools to coordinate their ESSA activities with other federal, state, and local activities. For example, ESSA encourages, among other things, the following:

- General coordination between ESSA and other federal, state, and local programs to enhance planning, service delivery, and integration of programs,[15] and

- Specific coordination between Title I of ESSA and other federal programs, including:

    - IDEA (which serves students with disabilities),

    - Perkins (which supports career and technical education programs),

    - Head Start (which supports preschool programs), and

    - McKinney-Vento (which supports students who are experiencing homelessness).[16]

This continued emphasis on coordination, combined with ESSA's expanded spending options, gives districts and schools opportunities to maximize federal funds by using more than one grant to support school improvement efforts.

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[14] This stipulation does not mean that districts must allocate the same resources to all schools. Allocations might vary for a variety of reasons, including differences across schools in terms of each school's grade spans, size, educational programming, student characteristics, and other factors. The key for SNS compliance is to ensure that any variations in allocations are not due to a school's participation in Title I.

[15] See, for example, ESSA § 8301.

[16] ESSA § 1111(a)(1)(B) and § 1112(a)(1)(B).

Practical Steps for Coordinating Funds

One way to approach coordinating funds is as follows.

Step 1: Identify the comprehensive activity to be implemented based on school and student needs.

This step helps the school and/or district prioritize its needs and determine which staff (academic staff, fiscal/grants staff, teachers, etc.) should be involved in the decision-making process.

Step 2: Identify the component costs of the activity.

A comprehensive activity is made up of various component costs. ED grants may be able to support certain costs but not others. By getting specific, early in the planning stages, about the component costs, a school and/or district can have a clearer understanding of the federal resources available to support the overall activity.

Step 3: Make a preliminary determination about which ED grants can support the various component costs.

Federal funding streams are designed for specific purposes and can only support certain types of activities, depending on the rules of the program. The requirements (such as eligibility or allowable uses of funds) need to be taken into account.

Step 4: Once an ED grant is identified as a potential funding source for a component cost, determine if the cost is "necessary and reasonable" and will benefit the federal program.

As well as satisfying other requirements, any cost charged to federal programs must be necessary for the performance or administration of the program. The cost must also be reasonable in light of the amount of money being spent and the needs of the school and/or district.

Step 5: Ensure that the cost is consistent with the district's application to the state.

Districts must ensure that costs are consistent with the applications they submit to the state. If necessary, the district may wish to amend its application if it believes a certain type of activity or cost that was not reflected in the initial application will be more effective for students.

Section II. Overview of Federal Spending Rules and of the Title I Part A, Title II Part A, and IDEA Part B Programs

This section provides a brief summary of general federal spending rules that apply to all federal grants, including the three programs addressed in this guide, followed by overviews of key Title I Part A, Title II Part A, and IDEA Part B rules that influence spending. While these summaries highlight certain rules, they do not cover *all* of the rules that affect spending or program compliance. Readers are encouraged to review the applicable federal statutes, regulations, and ED guidance, as well as state and local laws and policy, before taking any action under these programs.

A. General Federal Spending Rules That Apply to Title I Part A, Title II Part A, and IDEA Part B

Each of the three programs addressed in this guide is subject to a set of federal regulations known as the Uniform Grant Guidance (UGG).[17] Among the UGG's regulations are that it:

- **Establishes that certain types of costs may never be paid for with federal funds**.[18] For example, federal funds can never pay for alcohol[19] and typically cannot pay for lobbying.[20]

- **Describes general criteria all costs supported with federal funds must satisfy**.[21] For example, federal funds can pay only for costs that are "necessary and reasonable" for the performance of the federal grant.[22]

- **Sets additional requirements for certain costs that are supported with federal funds**.[23] For example, if federal funds are used to pay an employee's salary and benefits,

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[17] The UGG is contained in 2 CFR § 200, available at http://www.ecfr.gov/cgi-bin/text-idx?SID=f3948 247e9ceb83b01019746db896096&tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl. Federal guidance and other resources about the UGG are available at http://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html.

[18] 2 CFR § 200(E).

[19] 2 CFR § 200.423.

[20] 2 CFR § 200.450.

[21] 2 CFR § 200.403.

[22] 2 CFR § 200.403(a). For more information about the necessary and reasonable standard, see the Council of Chief State School Officers' *A Guide to State Educational Agency Oversight Responsibilities Under ESSA: The Role of the State in the Local Implementation of ESSA Programs,* available at http://www.ccsso.org/resource-library/role-state-local-implementation-essa-programs.

[23] See 2 CFR §§ 200.420–200.475.

specific recordkeeping requirements apply to documenting how much time the employee spent on grant activities (sometimes known as "time and effort" records).[24]

- **Establishes rules for how school districts procure goods and services** paid for with federal funds,[25] **how they track items** paid for with federal funds,[26] and the **kinds of records** they must keep about their grant spending.[27]

B. Title I Part A — Highlights of Program Rules That Influence Spending

Title I Part A is ED's largest grant program for elementary and secondary education. It helps states, school districts, and schools meet the educational needs of low-achieving students in schools with high concentrations of poverty.[28] School improvement is a key goal of the Title I Part A program, but Part A is often overlooked as a source of funding for school improvement efforts.

States receive Title I Part A funds from ED through a formula established by Congress. States may keep a limited amount of Title I funds to carry out certain activities and must allocate the rest to school districts through a formula.

Districts keep some Title I Part A money for central-level spending and must allocate the rest to eligible schools.[29]

As a condition of receiving Title I Part A funds, districts must meet three fiscal requirements:

- **Maintenance of effort (MOE)**, which requires districts to spend a consistent amount of state and local funding for free public education from year to year.[30]

- **Supplement not supplant (SNS)**, which, as described in Section I of this guide, requires districts to provide Title I schools with all of the state-funded and locally funded resources they would have received if they did not participate in Title I.[31]

- **Comparability**, which requires districts to ensure that state and local funds are used to provide services that, taken as a whole, are comparable between Title I and non–Title I schools.[32]

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[24] 2 CFR § 200.430.

[25] 2 CFR §§ 200.317–200.326.

[26] 2 CFR §§ 200.313–200.314.

[27] See, for example, 2 CFR § 200.318(h)(i) for procurement records or 2 CFR § 200.302(b)(3) for financial records.

[28] See p. 4 of U.S. Department of Education (2016), *Supporting school reform by leveraging federal funds in a schoolwide program,* Washington, DC: Author. Available at https://www2.ed.gov/policy/elsec/leg/essa/essaswpguidance9192016.pdf. (Subsequent footnotes refer to this guidance as *ED 2016 Schoolwide Guidance.*)

[29] Districts allocate Title I Part A funds to eligible schools through a process known as "ranking and serving." Briefly, districts must rank all of their schools from highest to lowest in terms of poverty. Then, districts must distribute Title I money to eligible schools in order of poverty ranking. (Typically, schools with at least 35 percent poverty are eligible for Title I.) Districts have some discretion to serve all eligible Title I schools or to limit the number of schools served in order to concentrate funds in higher-poverty schools.

[30] ESSA §§ 1118(a) and 8521.

[31] ESSA § 1118(b).

[32] ESSA § 1118(c).

If a district meets these requirements, the district and its schools can spend Title I Part A funds on activities to improve educational opportunities for Title I students,[33] including the following activities:

- Providing students with access to a well-rounded education[34]

- Providing instructional supports

- Providing non-instructional supports, such as behavior and mentoring supports, and social and emotional learning opportunities

- Pursuing school improvement efforts

1. Use of Title I Part A Funds at the District Level

Before allocating Title I funds to schools, districts must reserve some Title I funds for required activities specified in the Title I law.[35]

In addition, districts may reserve Title I funds for certain discretionary activities, including district-managed initiatives in all or a group of Title I schools.[36] As the name implies, a district-managed initiative is managed at the central level (rather than the school level) and is designed to improve the achievement of Title I students.[37] A district-managed initiative can be carried out in all, or in a subset of, Title I schools.[38] As described further in Section III

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[33] *ED 2016 Schoolwide Guidance,* p. 4.

[34] ESSA § 8101(52) defines a "well-rounded education" as "courses, activities, and programming in subjects such as English, reading or language arts, writing, science, technology, engineering, mathematics, foreign languages, civics and government, economics, arts, history, geography, computer science, music, career and technical education, health, physical education, and any other subject, as determined by the [state or district], with the purpose of providing all students access to an enriched curriculum and educational experience."

[35] Required activities include parent and family engagement, services to students experiencing homelessness, services to neglected and (in some cases) delinquent students, and services to eligible private school students (known as *equitable services*). ESSA §§ 1113(c)(3), 1116(a)(3), and 1117.

[36] Discretionary activities include transportation for students in schools identified for comprehensive support and improvement if the district offers these students the option to transfer to another school; financial incentives and rewards to teachers in schools identified for comprehensive or targeted support and improvement, for the purpose of attracting and retaining qualified and effective teachers; early childhood education programs for eligible children; the additional costs needed to transport children in foster care to their school of origin, consistent with ESSA § 1112(c)(5); and administering the Title I program.

[37] See 34 CFR § 200.77(g).

[38] U.S. Department of Education. (2009). *Using Title I, Part A ARRA funds for grants to local educational agencies to strengthen education, drive reform, and improve results for students*, Q&As B-7 through B-9. Washington, DC: Author. Available at https://www2.ed.gov/policy/gen/leg/recovery/guidance/titlei-reform.pdf. (Subsequent footnotes refer to this guidance as *ED 2009 Title I Reform Guidance.*) The following are two important points to note about this guidance: First, although the guidance was developed before ESSA to address ways that districts and schools could spend Title I Part A funds appropriated through the American Recovery and Reinvestment Act, the spending options described in the guidance are still permissible under ESSA. Second, SNS in Title I works differently under ESSA than it did at the time this guidance was developed. Consequently, some of the activities flagged as violating SNS rules in this guidance might be permissible now, depending on the circumstances. In addition, district-managed initiatives are sometimes called "districtwide" initiatives because they benefit all, or a group of, Title I schools. But these initiatives are not truly districtwide in a district that has both Title I and non–Title I schools. For example, a school cannot use Title I funds to benefit non–Title I students.

of this guide, district-managed initiatives can play an important role in rapid school improvement efforts.

2. Use of Title I Part A Funds at the School Level

Schools that receive Title I funds must support eligible students by using either a *schoolwide program* model or a *targeted assistance program* model.

A Title I school may operate a schoolwide program if it has at least 40 percent poverty.[39] In a schoolwide program:

- *All students* in the school are eligible for Title I services.[40]

- The school must conduct a *comprehensive needs assessment* and develop a *school-wide plan* for meeting the school's needs.[41]

  – The needs assessment must take into account information on the academic achievement of all students, particularly the needs of students struggling to meet state academic standards, and any other factors as determined by the school district.[42]

  – The schoolwide plan must describe the strategies the school will implement to address its needs.[43]

- The school may use its Title I funds to *upgrade the school's entire educational program* consistent with its needs and plan.[44] As highlighted in Section III of this guide, this stipulation gives schools that operate schoolwide programs significant flexibility to use Title I funds to support rapid school improvement efforts aligned to the school's needs and plan.

A Title I school that does not operate a schoolwide program must operate a targeted assistance program.[45] With a targeted assistance program, the school may use Title I funds only to help Title I students.[46] Students who are eligible for Title I include those who:

- Are failing, or at risk of failing, to meet state standards,

- Have participated in certain federally funded preschool programs,

- Have received services under the Migrant Education Program,

- Are in a local institution for neglected or delinquent children, or are attending a community day program, or

- Are experiencing homelessness.[47]

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[39] A school with less than 40 percent poverty may operate a schoolwide program if it receives a waiver from the state (ESSA § 1114(a)(1)(B)).

[40] ESSA § 1114(a)(2).

[41] ESSA § 1114(b).

[42] ESSA § 1114(b)(6).

[43] ESSA § 1114(b)(7).

[44] ESSA § 1114(a)(1)(A).

[45] ESSA § 1115.

[46] ESSA § 1115(b)(2)(A).

[47] ESSA § 1115(c).

From among this list of eligible students, the school must identify which students it will serve with Title I funds.[48]

C. Title II Part A — Highlights of Program Rules That Influence Spending

Title II Part A provides supplemental funding to help increase student achievement by improving the quality and effectiveness of teachers, principals, and other school leaders.[49] States receive Title II Part A funds from ED through a formula established by Congress. States may keep a limited amount of Title II Part A funds to carry out certain activities and must allocate the rest of the funds to districts through a formula.[50] Unlike for Title I Part A, districts are not required to allocate Title II Part A funds to schools.[51] A district can allocate Title II funds to schools or it can keep the funds for use at the central level.

As a condition of receiving Title II Part A funds, districts must meet two fiscal requirements:

- **Maintenance of effort (MOE)**, which requires districts to spend a consistent amount of state and local funds for free public education from year-to-year.[52]

- **Supplement not supplant (SNS)**, which works differently in Title II Part A than it does in Title I Part A. In Title II, supplanting is presumed when:

  – A district uses Title II funds to pay for an activity that is required by federal, state, or local law, or

  – A district uses Title II funds to pay for an activity that it supported with state or local funds the prior year.[53]

Districts that meet these requirements can use Title II funds for a wide range of activities to support the quality and effectiveness of teachers, principals, and other school leaders and staff. Allowable activities are listed in Section 2103 of ESSA, which is available at https://www.gpo.gov/fdsys/pkg/BILLS-114s1177enr/pdf/BILLS-114s1177enr.pdf.

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[48] ESSA § 1115(b)(1).

[49] ESSA § 2001.

[50] How the Title II Part A formula works has changed under ESSA at both the state and local levels. For more information about the Title II Part A allocation changes, see U.S. Department of Education (2016), *Fiscal changes and equitable services requirements under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA)*, Part III, Washington, DC: Author. Available at https://www2.ed.gov/policy/elsec/leg/essa/essaguidance160477.pdf

[51] Title II Part A funds are subject to an equitable services requirement for private school students, their teachers, and other educational personnel. See ESSA § 8501.

[52] ESSA § 8521.

[53] Only these two presumptions of supplanting apply for Title II Part A, which is relevant because ED applied a third presumption of supplanting for Title I Part A under NCLB and earlier versions of ESEA before ESSA changed Title I Part A's SNS test. Although the third presumption never applied to Title II Part A, it has been a source of confusion in the past. Also note that a district may be able to overcome a presumption of supplanting if there is written documentation (for example, state or local legislative action, budget information, or other materials) that the district does not have the funds necessary to implement the activity and that the activity would not be carried out in the absence of the Title II Part A funds.

Activities supported with Title II funds must:

- Be consistent with Title II's purpose (as indicated previously), and

- Address the learning needs of all students, including children with disabilities, English learners, and gifted and talented students.[54]

Districts must prioritize Title II Part A funds to schools that:

- Are implementing comprehensive support and improvement activities and targeted support and improvement activities,[55] and

- Have the highest percentage of low-income and other children counted under Section 1124(c) of Title I.[56]

In addition, districts must consult meaningfully with a wide array of stakeholders on the school's plan for carrying out Title II activities[57] and must use data and conduct ongoing stakeholder consultation to update and improve activities supported with Title II funds.[58]

D. IDEA Part B — Highlights of Program Rules That Influence Spending

IDEA Part B includes two grant programs that help to provide a free appropriate public education[59] to students with disabilities:

- Section 611 of IDEA, known as the Grants to States for Education of Children with Disabilities program, which supports students with disabilities, ages 3 to 21, and

- Section 619 of IDEA, known as the Preschool Grants for Children with Disabilities program, which supports students with disabilities, ages 3 to 5.

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[54] ESSA § 2103(b)(1)–(2).

[55] Schools implementing comprehensive or targeted support and improvement activities are identified by the state, based on performance factors set out in its ESSA State Plan.

[56] ESSA § 2102(b)(2)(C). ESSA § 1124(c) defines the children who are counted for Title I formula purposes, which includes the number of children aged 5 to 17, inclusive, who live in (1) families with incomes at or below the poverty level (according to the Department of Commerce); (2) families with incomes above the poverty level but who receive local assistance through Part A of Title IV of the Social Security Act (i.e., Temporary Aid to Needy Families, or TANF) (according to the Department of Health and Human Services); (3) institutions that local governments administer for neglected and delinquent children (according to ED); and (4) foster homes in which the foster parents receive payments from a state or county for the children's support (according to the Department of Health and Human Services). See p. 5 of National Center for Education Statistics (2016), *Allocating grants for Title I,* Washington, DC: Author. Available at https://nces.ed.gov/surveys/AnnualReports/pdf/titleI20160111.pdf

[57] ESSA § 2102(b)(3). Stakeholders include teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (if the LEA has charter schools), parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet Title II purposes.

[58] ESSA § 2102(b)(2)(D).

[59] A "free appropriate public education" means special education and related services that (1) are provided without charge and under public supervision; (2) meet standards set by the state; (3) include an appropriate preschool, elementary school, or secondary school education; and (4) conform to students' individualized education plans (34 CFR § 300.17).

States receive IDEA Part B funds from ED through formulas established by Congress. States may keep a limited amount of Part B funds to carry out certain activities and must allocate the rest of the funds to districts through a formula. Unlike for Title I Part A, districts are not required to allocate IDEA Part B funds to schools.[60] A district can allocate IDEA Part B funds to schools or can keep the funds for use at the central level.

As a condition of receiving IDEA Part B funds, districts must satisfy the following three fiscal requirements:

- **Excess cost**, which requires districts to spend the same average amount of non-IDEA money on children with disabilities as it spends on children in the district as a whole[61] (the amount of non-IDEA money that a district must contribute is established through calculations set out in IDEA Part B regulations)[62]

- **Maintenance of effort (MOE)**, which requires each district to spend at least as much state and/or local money on special education as it did the year before (the procedures for determining MOE compliance are set out in IDEA Part B regulations)[63]

- **Supplement not supplant (SNS)**, which prohibits districts from using IDEA Part B funds to replace the state, local, and other federal funds that they would otherwise spend on special education if they did not participate in IDEA. For IDEA Part B, a district satisfies SNS by meeting the MOE requirement described in the previous bullet[64]

Districts that meet these requirements can use IDEA Part B funds to pay for special education[65] and related services[66] to eligible students with disabilities.

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[60] IDEA Part B funds are subject to an equitable services requirement for private school students with disabilities. See IDEA § 612(a)(10)(A).

[61] Center for IDEA Fiscal Reporting at WestEd. (2018). *Key differences between IDEA local educational agency maintenance of effort and excess cost requirements*. San Francisco, CA: WestEd. Available at https://cifr.wested.org/wp-content/uploads/2018/01/CIFR-MOE-vs-Excess-Cost-Document.pdf

[62] 34 CFR § 300, Appendix A.

[63] 34 CFR § 300, Appendix E.

[64] U.S. Department of Education (2010), *Non-regulatory guidance on funds for Part B of the Individuals with Disabilities Education Act made available under the American Recovery and Reinvestment Act of 2009,* Q&A C-6 (p. 13), Washington, DC: Author. Available at http://www2.ed.gov/policy/gen/leg/recovery/guidance/idea-b-revised-910.pdf

[65] Special education means specially designed instruction, at no cost to the parents, to meet the unique needs of a child with a disability. It includes physical education, speech-language pathology services (or any other related services considered special education under state standards), travel training, and vocational education.

[66] Related services means transportation and developmental, corrective, and other supportive services that students with disabilities need to benefit from special education. These services may include speech-language pathology and audiology services, interpreting services, psychological services, physical and occupational therapy, recreation (including therapeutic recreation), early identification and assessment of disabilities in children, counseling services (including rehabilitation counseling), orientation and mobility services, and medical services for diagnostic or evaluation purposes. Related services also include school health services and school nurse services, social work services in schools, and parent counseling and training.

Section III. Examples of Using Federal Funds to Support the Four Domains for Rapid School Improvement

This section includes examples of how Title I Part A, Title II Part A, and IDEA Part B funds can pay for certain activities aligned to the four domains for rapid school improvement. These examples are offered for informational purposes only and are not intended to present advice about any particular set of facts.

It is important to note that each federal program discussed in this guide is governed by statutory and regulatory requirements that play out differently in different situations. The fact that an activity is listed in this guide does not mean that federal funds could support the activity in all circumstances. Similarly, the fact that an activity is not listed in this guide does not mean that federal funds could never support the activity. Readers are encouraged to review the appropriate federal statutes, regulations, and U.S. Department of Education (ED) guidance, as well as state and local laws and policy, before taking any action with regard to the use of federal funds.

Notes About Examples of Using Federal Funds

- The examples in this section assume that districts have satisfied relevant fiscal requirements such as MOE and SNS (see Section II of this guide for more information).

- In the Title I Part A examples, district spending is described separately from school spending because districts and schools have different spending options.

  - Districts:

    » *Must* keep and spend some Title I Part A funds for certain activities listed in the Title I law (such as parent involvement, and assistance for students experiencing homelessness) (see Section II.B.1 of this guide), and

    » *May choose* to keep and spend some Title I funds for district-managed activities that benefit all, or a subset of, Title I schools (see Section II.B.1 of this guide), which can be a way to support district-managed school improvement initiatives in Title I schools.

  - A Title I school's spending options depend on whether it operates a *schoolwide program* or a *targeted assistance program*.

    » A school operating a *schoolwide program* has the most flexibility to spend Title I Part A funds to upgrade its entire educational program, consistent with its needs and schoolwide plan (see Section II.B.2 of this guide).

    » A school operating a *targeted assistance program* may spend Title I Part A funds only on specific students, which limits Title I's support for comprehensive interventions (see Section II.B.2 of this guide).

- In the examples for Title II Part A and IDEA Part B, district spending is not described separately from school spending because those programs do not require districts to allocate funds directly to schools. Districts can allocate funds directly to schools, or they can choose to keep the funds for use centrally. Either way, districts must comply with any rules prioritizing how the funds are spent, such as Title II's requirement to prioritize services to certain schools (see Section II.C of this guide).

A. Using Federal Funds to Support Turnaround Leadership (Domain 1)

As described in *Four Domains for Rapid School Improvement*, turnaround leadership, including leaders at all levels, drives initiatives to facilitate rapid, significant improvement for low-performing schools. *Four Domains for Rapid School Improvement* identifies three practices that are important to effective turnaround leadership.

Practice 1A: Prioritize improvement and communicate its urgency

Practice 1B: Monitor short- and long-term goals

Practice 1C: Customize and target support to meet needs

Following are examples of activities that are aligned to these three practices and that can be supported with Title I Part A, Title II Part A, or IDEA Part B funds.

1. Using Title I Part A to Support Turnaround Leadership

Title I Part A can support a variety of activities to recruit, retain, and support turnaround leaders in Title I schools.

ED recognizes the importance of strong leadership to school improvement, a key goal of the Title I Part A program:

> Given the importance of strong principal leadership to recruiting, retaining, and developing teachers, high-quality preparation and on-going professional development for principals, incentives to attract and retain effective principals, and evaluations that provide ongoing feedback and guidance for improvement to principals also are important strategies.[67]

Following are some examples of turnaround leadership activities that could be supported with Title I Part A funds.

Title I Part A District-Level Spending

To support turnaround leadership, a district could reserve Title I Part A funds for district-managed initiatives such as the following:

- Enhancing the district's existing recruitment efforts to **recruit principals** with the specific skills necessary to turn around low-achieving Title I schools.[68]

- **Financial incentives and awards** to retain qualified and effective principals in Title I schools.[69]

- A **principal academy** to build the leadership capacity of principals in Title I schools, which could include building the capacity of new principals who will work in Title I schools, providing them with the skills necessary to turn around low-achieving schools.[70]

- **Professional development** for principals and other school leaders to increase effectiveness in improving achievement in the lowest-achieving Title I schools.[71]

- Providing **feedback to and evaluations of principals** of Title I schools.[72]

- Technical assistance from a **data expert** who works with principals and other school leaders of low-achieving Title I schools to build their capacity to analyze student data more effectively and to identify interventions that have the greatest likelihood of improving the academic achievement of the schools' lowest-achieving students.[73]

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[67] *ED 2009 Title I Reform Guidance,* p. 21.

[68] *ED 2009 Title I Reform Guidance,* Q&A E-14.

[69] *ED 2009 Title I Reform Guidance,* Q&A E-12.

[70] *ED 2009 Title I Reform Guidance,* Q&A E-12.

[71] *ED 2009 Title I Reform Guidance,* Q&A E-13.

[72] *ED 2009 Title I Reform Guidance,* Q&A E-5.

[73] *ED 2009 Title I Reform Guidance,* Q&A D-1.

- A **dynamic data system**, such as a data dashboard, to help principals and other school leaders in Title I schools to identify, track, and analyze data that will assist them in better targeting interventions to low-achieving students.[74]

Title I Part A School-Level Spending

A Title I school operating a *schoolwide program* could, if consistent with the school's needs assessment and schoolwide plan, spend Title I Part A funds on activities such as the following:

- The **kinds of activities in the list for district-level spending**, but carried out at the school level instead. For example, a school operating a schoolwide program could use its Title I Part A funds on efforts to recruit school leaders with the skills to turn the school around, financial incentives to attract and retain effective leaders, professional development for the school's leaders, technical assistance for the principal, and the like.[75]

- The **planning necessary to implement a rigorous intervention** designed to turn around a low-achieving Title I school operating a schoolwide program, including activities such as:

    - **Assessing the strengths and weaknesses of school leaders**,

    - **Recruiting principals** with the needed skills to implement rigorous interventions,

    - **Screening and identifying external partners,** as appropriate, and/or

    - Designing multi-pronged **strategies for changing the school's culture and improving teaching and learning**.[76]

A Title I school operating a *targeted assistance program* has fewer spending options because it can use Title I Part A funds only to benefit Title I students. Because turnaround leadership typically affects an entire school, it is unlikely that a targeted assistance school could use Title I Part A funds to support a comprehensive turnaround leadership initiative.

However, to the extent that an activity directly benefits Title I students — for example, professional development for a school's principal or other school leaders that focuses on meeting the needs of Title I students — the cost of the activity could be supported with Title I funds, if properly documented.

2. Using Title II Part A to Support Turnaround Leadership

Title II Part A can be a significant source of support for recruiting, retaining, and supporting school turnaround leaders.

ED's Title II Part A guidance[77] includes a section on transformative school leadership and provides several examples of strategies that Title II Part A can support, such as the following:

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[74] *ED 2009 Title I Reform Guidance,* Q&A D-3.

[75] *ED 2009 Title I Reform Guidance,* p. 21.

[76] *ED 2009 Title I Reform Guidance,* Q&A F-2.

[77] U.S. Department of Education. (2016). *Non-regulatory guidance for Title II, Part A: Building systems of support for excellent teaching and leading.* Washington, DC: Author. Available at https://www2.ed.gov/policy/elsec/leg/essa/essatitleiipartaguidance.pdf. (Subsequent footnotes refer to this guidance as *ED 2016 Title II Guidance.*)

- Partnering with organizations to **provide leadership training** and opportunities for principals and other school leaders to hone their craft and bring teams together to improve school structures.

- Offering **community-of-learning opportunities** in which principals and other school leaders engage with their school teams to fully develop broad curriculum models.

- Developing **opportunities for principals and other school leaders to collaborate, problem-solve, and share best practices**.[78]

Other examples of turnaround leadership activities that Title II Part A can support include the following:

- An **evaluation and support system** for principals or other school leaders that is based in part on evidence of student achievement and that includes multiple measures of performance;[79] relatedly, a system for **auditing the quality of the evaluation and support system**.[80]

- **Recruitment and retention initiatives** for principals and school leaders, such as:

  - **Differential and incentive pay** for principals or other school leaders in high-need areas.[81]

  - **Advancement and professional growth initiatives** for principals or other school leaders.[82]

  - **Induction and mentoring programs** for new principals or other school leaders, designed to improve classroom instruction and student learning and to increase retention.[83]

  - **Training for school leaders** on how to accurately differentiate performance, provide useful feedback, and use evaluation results to inform decision-making about professional development, improvement strategies, and personnel decisions.[84]

  - **Recruitment of qualified individuals from other fields** to become principals or other school leaders.[85]

- **Professional development for principals and other school leaders that is personalized,** high-quality, evidence-based,[86] and focused on improving teaching and student learning and achievement.[87] This professional development could focus on effectively integrating technology into curricula and instruction; using data to improve student achievement, consistent with privacy rules; effective parent, family, and community engagement; helping students to develop learning readiness and academic-success

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[78] *ED 2016 Title II Guidance,* p. 15.

[79] ESSA § 2103(b)(3)(A).

[80] ESSA § 2103(b)(3)(B)(vi).

[81] ESSA § 2103(b)(3)(B)(ii).

[82] ESSA § 2103(b)(3)(B)(iii).

[83] ESSA § 2103(b)(3)(B)(iv).

[84] ESSA § 2103(b)(3)(B)(v).

[85] ESSA § 2103(b)(3)(C).

[86] Personalized professional development must be evidence-based to the extent the state, in consultation with districts, determines that such evidence is reasonably available (ESSA § 2103(b)(3)(E)). The definition of "evidence-based" is available in ESSA § 8101(21).

[87] ESSA § 2103(b)(3)(E).

skills; developing policies with school, district, community, or state leaders; and experiential learning through observations.[88]

- Programs and activities that:

  – Increase effective instruction for **students with disabilities and for English learners**.[89]

  – Increase knowledge of instruction in the **early grades, strategies to measure whether young children are progressing**, and the ability of principals to support teachers and others to meet the needs of students through age 8.[90]

  – Provide **training, technical assistance, and capacity building to support principals and other school leaders in selecting and implementing formative assessments, designing classroom-based assessments, and using data from assessments** to improve instruction.[91]

  – Provide professional development and other comprehensive systems of support to principals and other school leaders to promote high-quality instruction and **instructional leadership in science, technology, engineering, and mathematics** subjects, including computer science.[92]

- Developing feedback mechanisms to **improve school working conditions**.[93]

- Providing high-quality professional development for principals and other school leaders on **effective strategies to integrate rigorous academic content, career and technical education, and work-based learning to help prepare students for postsecondary education and the workforce**.[94]

- **Training for school leaders on topics related to school conditions for student learning,** such as:

  – **Techniques and supports regarding when and how to refer students** and the use of referral mechanisms for students affected by **trauma or mental illness**.[95]

  – Forming **partnerships** between school-based mental health programs and public or private mental health organizations.[96]

  – **Safety, peer interaction, drug and alcohol abuse, and chronic absenteeism**.[97]

  – **Preventing and recognizing child sexual abuse**.[98]

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[88] ESSA § 2103(b)(3)(E)(i)–(vi).

[89] ESSA § 2103(b)(3)(F).

[90] ESSA § 2103(b)(3)(G).

[91] ESSA § 2103(b)(3)(H).

[92] ESSA § 2103(b)(3)(M).

[93] ESSA § 2103(b)(3)(N).

[94] ESSA § 2103(b)(3)(O).

[95] ESSA § 2103(b)(3)(I)(i)–(ii).

[96] ESSA § 2103(b)(3)(I)(iii).

[97] ESSA § 2103(b)(3)(I).

[98] ESSA § 2103(b)(3)(L).

3. Using IDEA Part B to Support Turnaround Leadership

IDEA Part B funds can support activities that help turnaround leaders meet the needs of students with disabilities, as part of a school improvement initiative. As ED recognized in its IDEA Part B guidance, "effective principals play a critical role in enhancing the overall effectiveness of teachers."[99]

IDEA Part B funds can support school leadership activities relating to students with disabilities, such as the following:

- **Training principals and other school leaders** on:

    – Supporting teachers to improve instruction for students with disabilities.[100]

    – Specific strategies to support students with disabilities, such as progress monitoring and data-driven decision-making to improve interventions, placement decisions, and staffing decisions.[101]

- Establishing **data systems to support students with disabilities,** such as progress-monitoring systems, web-based Individualized Education Program (IEP) systems, and early childhood data systems, as well as training and supports for school leaders to effectively use these systems.[102]

B. Using Federal Funds to Support Talent Development (Domain 2)

As described in *Four Domains for Rapid School Improvement*, talent development helps to ensure that every position at every level is staffed by competent and committed personnel. The framework identifies three practices that are central to effective talent development:

Practice 2A: Recruit, develop, retain, and sustain talent

Practice 2B: Target professional development activities

Practice 2C: Set clear performance expectations

Following are examples of activities that are aligned to these practices and that can be supported with Title I Part A, Title II Part A, or IDEA Part B funds.

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[99] See U.S. Department of Education. (2009). *American Recovery and Reinvestment Act of 2009: Using ARRA funds provided through Part B of the Individuals with Disabilities Education Act (IDEA) to drive school reform and improvement* (p. 6). Available at https://www2.ed.gov/policy/gen/leg/recovery/guidance/idea-b-reform.pdf. (Subsequent footnotes refer to this guidance as *ED 2009 IDEA Reform Guidance.*) Although this guidance addresses how districts could spend IDEA Part B funds appropriated through the American Recovery and Reinvestment Act, the spending options described in the guidance are permissible with regular IDEA Part B funds too.

[100] See *ED 2009 IDEA Reform Guidance,* p. 6.

[101] See generally *ED 2009 IDEA Reform Guidance*, particularly p. 2 and p. 35.

[102] *ED 2009 IDEA Reform Guidance,* pp. 33–40.

1. Using Title I Part A to Support Talent Development

Title I Part A can support a variety of activities to recruit, develop, retain, and sustain educators in turnaround schools.

ED recognizes the importance of effective and committed personnel to school improvement, a key goal of the Title I Part A program:

> Effective teachers and school leaders are a major influence on students' academic success. Districts can improve teacher and school leader effectiveness and address inequitable distribution of effective teachers and school leaders through the ways in which they recruit, hire, induct, develop, evaluate, advance, and compensate teachers and school leaders. Moreover, they can create school conditions that foster teacher and school leader effectiveness and retention by doing things such as creating time for collaboration and cultivating a culture of continuous improvement.[103]

Following are some examples of talent development activities that could be supported with Title I Part A funds.

Title I Part A District-Level Spending

To support talent development, a district could reserve Title I Part A funds for district-managed initiatives such as the following:

- **Financial incentives and rewards** for teachers who serve in low-performing Title I schools, to attract and retain qualified and effective teachers.[104]

- **Professional development for educators who support Title I students**,[105] which can include:

  – Hiring instructional coaches to work with educators who support Title I students,[106]

  – Paying stipends to educators to participate in professional development,[107] and/or

  – Paying for substitute teachers to permit educators who participate in professional development to be released from regular classroom duties.[108]

Title I Part A School-Level Spending

A Title I school operating a *schoolwide program* could, if consistent with the school's needs assessment and schoolwide plan, spend Title I Part A funds on activities such as the following:

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[103] *ED 2009 Title I Reform Guidance,* p. 21.

[104] Districts may reserve up to 5 percent of their Title I Part A funds for this purpose (ESSA § 1113(c)(4)). The financial incentives and rewards must be used for teachers in Title I schools that are identified for comprehensive or targeted support and improvement under ESSA § 1111(d). Districts can also use Title II Part A funds for these financial incentives and rewards.

[105] In a Title I school that operates a schoolwide program, these educators consist of all the school's teachers, whereas in a Title I school that operates a targeted assistance program, these educators include only those teachers who work with identified students.

[106] *ED 2009 Title I Reform Guidance,* Q&A E-6.

[107] *ED 2009 Title I Reform Guidance,* Q&A E-7.

[108] *ED 2009 Title I Reform Guidance,* Q&A E-8.

- **Recruitment and retention** of effective teachers, particularly in high-need subjects.[109]

- **Induction programs** for new teachers, which can include regular mentoring, opportunities to observe other teachers in their classrooms, provision of useful materials and resources, collaborative work with other new teachers, and professional development on topics important to new teachers, such as classroom management, lesson planning, differentiated instruction, time management, and relationships with students, families, colleagues, and administrators.[110]

- Creating time within the school day for teachers to **plan collaboratively**.[111]

- **Instructional coaches** to provide high-quality, school-based professional development.[112]

- **Training** (which can include the costs of stipends and substitute teachers) to support activities such as:

    - Accelerating the acquisition of content knowledge for **English learners**,

    - Increasing student success in high-quality **advanced courses**,

    - **Career and technical education** programs,

    - Improving students' **nonacademic skills**,

    - **School climate** interventions,

    - **Response-to-intervention** strategies, and

    - **Parent and family engagement**.[113]

- Equipment, materials, and **training needed to compile and analyze student achievement data** to monitor progress, alert the school to struggling students, and drive decision-making.[114]

- School-based **evaluation/feedback systems**.[115]

A Title I school operating a *targeted assistance program* could spend Title I Part A funds on activities such as the following:

- **Hiring teachers and other instructional staff** to work with Title I–eligible students.[116]

- Providing **professional development** for teachers, paraprofessionals, specialized instructional support personnel (if appropriate), and other school personnel who work with Title I-eligible students.[117]

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[109] *ED 2016 Schoolwide Guidance,* p. 4.

[110] *ED 2009 Title I Reform Guidance,* Q&A E-4.

[111] *ED 2009 Title I Reform Guidance,* Q&A G-5.

[112] *ED 2016 Schoolwide Guidance,* p. 4.

[113] *ED 2016 Schoolwide Guidance,* pp. 4–5.

[114] *ED 2016 Schoolwide Guidance,* p. 5.

[115] *ED 2009 Title I Reform Guidance,* Q&A E-5.

[116] See ESSA § 1115(b).

[117] ESSA § 1115(b)(2)(D).

2. Using Title II Part A to Support Talent Development

Title II Part A can be a significant source of support for recruiting, retaining, and supporting educators in turnaround schools.

ED recognizes the role Title II Part A can play in ensuring that all students have access to effective teachers:

> To ensure that every student has access to excellent educators, SEAs [state educa-tion agencies] and LEAs [local education agencies] must work together to develop, attract, and retain excellent educators in all schools, especially in high-need schools. Part of the purpose of the Title II Part A program is to provide students from low-income families and minority students greater access to effective teachers, principals, and other school leaders. (ESEA section 2001). To realize this outcome, SEAs and LEAs are strongly encouraged to use Title II Part A funds to improve equitable access to effective teachers.[118]

Examples of activities that Title II Part A can support include the following:

- An **evaluation system** and a **support system** that are based, in part, on evidence of student achievement and that include multiple measures of performance;[119] relatedly, a system for **auditing the quality of evaluation and support systems**.[120]

- Initiatives to **recruit, hire, and retain effective teachers**, particularly in low-income schools with higher percentages of ineffective teachers and of students who do not meet state standards. Such initiatives might include:

  - Expert help in **screening candidates** and **enabling early hiring**,[121]

  - **Differential and incentive pay** for principals or other school leaders in high-need areas,[122]

  - **Advancement and professional growth initiatives** for teachers and paraprofessionals,[123]

  - New teacher **induction and mentoring programs** that are designed to improve classroom instruction and student learning and to increase retention,[124] and

  - **Training for school leaders, coaches, mentors, and evaluators** on how to accu-rately differentiate performance, provide useful feedback, and use evaluation results to inform decision-making about professional development, improvement strategies, and personnel decisions.[125]

- **Recruiting qualified individuals from other fields** to become teachers.[126]

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[118] *ED 2016 Title II Guidance,* p. 20.
[119] ESSA § 2103(b)(3)(A).
[120] ESSA § 2103(b)(3)(B)(vi).
[121] ESSA § 2103(b)(3)(B)(i).
[122] ESSA § 2103(b)(3)(B)(ii).
[123] ESSA § 2103(b)(3)(B)(iii).
[124] ESSA § 2103(b)(3)(B)(iv).
[125] ESSA § 2103(b)(3)(B)(v).
[126] ESSA § 2103(b)(3)(C).

- High-quality, evidence-based,[127] **personalized professional development for teachers and instructional leaders** that is focused on improving teaching and student learning and achievement.[128] This professional development could focus on effectively integrating technology into curricula and instruction; using data to improve student achievement, consistent with privacy rules; effectively engaging parents, families, and the community; helping students to develop learning readiness and academic-success skills; developing policies with school, district, community, or state leaders; and experiential learning through observations.[129]

- Programs and activities that:

  – Increase effective instruction for **students with disabilities** and for **English learners**.[130]

  – Increase knowledge of instruction for the **early grades**.[131]

  – Provide training to support the identification of students who are **gifted and talented,** and to support **implementing instructional strategies for such students**.[132]

  – Promote high-quality instruction and instructional leadership in **science, technology, engineering, and mathematics** subjects, including computer science.[133]

  – Provide high-quality professional development for teachers on effective strategies to integrate rigorous academic content, career and technical education, and work-based learning to help **prepare students for postsecondary education and the workforce**.[134]

- **Training on topics related to school conditions for student learning,** such as:

  – **Techniques and supports regarding when and how to refer students** and the **use of referral mechanisms** for students affected by **trauma or mental illness**.[135]

  – **Forming partnerships** between school-based mental health programs and public or private mental health organizations.[136]

  – **Safety, peer interaction, drug and alcohol abuse, and chronic absenteeism**.[137]

  – **Preventing and recognizing child sexual abuse**.[138]

- Developing feedback mechanisms to **improve school working conditions**.[139]

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[127] Personalized professional development must be evidence-based to the extent the state, in consultation with districts, determines such evidence is reasonably available (ESSA § 2103(b)(3)(E)). The definition of "evidence-based" is available in ESSA § 8101(21).

[128] ESSA § 2103(b)(3)(E).

[129] ESSA § 2103(b)(3)(E)(i)–(vi).

[130] ESSA § 2103(b)(3)(F).

[131] ESSA § 2103(b)(3)(G).

[132] ESSA § 2103(b)(3)(J).

[133] ESSA § 2103(b)(3)(M).

[134] ESSA § 2103(b)(3)(O).

[135] ESSA § 2103(b)(3)(I)(i)–(ii).

[136] ESSA § 2103(b)(3)(I)(iii).

[137] ESSA § 2103(b)(3)(I).

[138] ESSA § 2103(b)(3)(L).

[139] ESSA § 2103(b)(3)(N).

3. Using IDEA Part B to Support Talent Development

IDEA Part B funds can support talent development activities that help all educators who work with students with disabilities to meet those students' needs.

ED recognizes the importance of effective teachers to the IDEA Part B program:

> Effective teachers play a critical role in enhancing student learning outcomes, and effective principals play a critical role in enhancing the overall effectiveness of teachers. Improving teacher effectiveness as well as addressing inequitable teacher distribution generally requires a multi-faceted approach that focuses on, as appropriate, strategies such as: (1) recruitment and hiring to address shortages of special education and other teachers; (2) preservice preparation to produce new teachers; (3) strategic placement and distribution of teachers; (4) licensure; (5) professional development; (6) teacher evaluation; (7) teacher advancement; and (8) teacher compensation. It also requires attention to strong LEA and school leadership that support the conditions that foster teacher effectiveness and retention such as: time for collaboration, structured induction programs, and a culture of data-driven, continuous improvement. Increasing teacher effectiveness in improving results for students with disabilities should be considered in the context of a broader LEA human capital strategy. Given that most students with disabilities are in the regular classroom and are taught by general education teachers most of the day, recruiting highly qualified general education teachers and providing ongoing professional development for general classroom teachers to ensure they have the knowledge and skills to teach these students effectively, as well as equipping special education teachers with core academic content knowledge, is essential.[140]

Examples of activities that IDEA Part B can support include the following:

- Hiring effective, dually certified **special education teachers**.[141]

- Paying for teachers to participate in **high-quality certification programs** that increase teacher effectiveness in improving outcomes for students with disabilities.[142]

- Providing site-based, **job-embedded professional development for special education teachers** that leads to certification in content areas through partnerships with an institution of higher education (IHE) and/or a recognized alternative certification program.[143]

- Providing site-based, **job-embedded professional development for general education teachers** that leads to certification in special education through partnerships with an IHE and/or a recognized alternative certification program.[144]

- **Induction programs** that use evidence-based practices such as creating ongoing support and opportunities for interaction between novice and experienced special

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[140] *ED 2009 IDEA Reform Guidance,* p. 6.

[141] *ED 2009 IDEA Reform Guidance,* p. 8.

[142] *ED 2009 IDEA Reform Guidance,* p. 8.

[143] *ED 2009 IDEA Reform Guidance,* p. 8.

[144] *ED 2009 IDEA Reform Guidance,* p. 8.

education teachers (such as classroom observations, advising, group meetings for grade-level teams, and networking within and outside of the school).[145]

- **Teacher mentoring programs**, including the cost of hiring substitute teachers to provide release time for special education teacher mentors.[146]

- **Training mentors** in adult development and learning, conferencing skills, and relationship and communication skills to prepare the mentors to work with special education teachers.[147]

- **Training teachers on specific initiatives** to support students with disabilities, including:

  – Increasing the **use of technology** to improve outcomes for students with disabilities,[148]

  – Selecting and using **assistive technology**,[149]

  – Using **Universal Design for Learning** (UDL) approaches,[150]

  – Providing special education and related services to students with disabilities as part of **response-to-intervention/multi-tiered system of support**,[151]

  – Implementing **literacy interventions** for students with disabilities,[152]

  – Implementing **math interventions** for students with disabilities,[153]

  – Providing **positive behavioral supports** for students with disabilities,[154]

  – Providing **social and emotional development supports** for young children,[155]

  – Providing **transition supports** for students with disabilities,[156] and

  – **Using data** for improving student outcomes.[157]

[145] *ED 2009 IDEA Reform Guidance,* p. 10.
[146] *ED 2009 IDEA Reform Guidance,* p. 10.
[147] *ED 2009 IDEA Reform Guidance,* p. 10.
[148] *ED 2009 IDEA Reform Guidance,* p. 12.
[149] *ED 2009 IDEA Reform Guidance,* p. 14.
[150] *ED 2009 IDEA Reform Guidance,* p. 18.
[151] *ED 2009 IDEA Reform Guidance,* p. 21.
[152] *ED 2009 IDEA Reform Guidance,* p. 23.
[153] *ED 2009 IDEA Reform Guidance,* p. 25.
[154] *ED 2009 IDEA Reform Guidance,* p. 27.
[155] *ED 2009 IDEA Reform Guidance,* p. 29.
[156] *ED 2009 IDEA Reform Guidance,* p. 31.
[157] *ED 2009 IDEA Reform Guidance,* p. 33.

C. Using Federal Funds to Support Instructional Transformation (Domain 3)

As described in *Four Domains for Rapid School Improvement*, improving student learning requires systemwide support for changing classroom instruction. The framework identifies three practices that are central to effective instructional transformation:

Practice 3A: Diagnose and respond to student learning needs

Practice 3B: Provide rigorous evidence-based instruction

Practice 3C: Remove barriers and provide opportunities

Following are examples of activities that are aligned to these practices and that can be supported with Title I Part A, Title II Part A, or IDEA Part B funds.

1. Using Title I Part A to Support Instructional Transformation

Title I Part A can support a variety of activities to improve instruction in turnaround schools.

ED recognizes the importance of instructional transformation to school improvement, a key goal of the Title I Part A program:

> World-class education systems are built upon college- and career-ready standards, rich and engaging curricula based on high standards, and high-quality assessments that are aligned to such standards and that measure student progress and provide information regarding the improvement of student achievement. Although many States are actively revising their standards and assessments to increase rigor and improve alignment, districts and schools can concurrently take steps to promote rigorous standards, effective assessment systems, and strong curricula. Promising strategies . . . include: increasing student participation in advanced coursework (see C-1–C-5); using formative and interim assessments to track student progress and improve instruction (see C-6, C-7); and using high-quality supplemental instructional materials (see C-8).[158]

Following are some examples of instructional transformation activities that could be supported with Title I Part A funds.

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[158] *ED 2009 Title I Reform Guidance,* p. 16. It is important to note that some of the restrictions on the use of Title I funds for instructional transformation discussed in Section C of *ED 2009 Title I Reform Guidance* will not apply in the same way under ESSA because the "supplement not supplant" rules for Title I Part A changed under ESSA (see Section I.B). Therefore, it should be easier to use Title I Part A funds as part of an instructional transformation strategy for low-performing schools.

Title I Part A District-Level Spending

To support instructional transformation, a district could reserve Title I Part A funds for district-managed initiatives such as the following:

- **Summer school** (including summer activities designed to increase student participation in advanced coursework).[159]

- **Professional development** for school leaders and staff, relevant to instructional transformation.[160]

- **Instructional materials**.[161]

- **Other district-managed instructional transformation activities** carried out in all, or a subset of, the district's Title I schools (activities could include, but are not limited to, the types of activities described in the following section for schools operating schoolwide programs, but instead managed by the district and carried out in one or more Title I schools).

Title I Part A School-Level Spending

A Title I school operating a *schoolwide program* could, if consistent with the school's needs assessment and schoolwide plan, spend Title I Part A funds on activities such as the following:

- **High-quality preschool** or **full-day kindergarten** and services to facilitate the transition from early learning to elementary education programs.[162]

- **Instructional coaches**.[163]

- **Increased learning time**.[164]

- Reorganizing the school day to **give teachers time to collaborate**.[165]

- Evidence-based strategies to accelerate the acquisition of content knowledge for **English learners**.[166]

- Activities designed to increase access and prepare students for success in **high-quality advanced coursework** to earn postsecondary credit while in high school (such as Advanced Placement, International Baccalaureate, early college high schools, and **dual or concurrent enrollment** programs).[167]

- **Career and technical education** programs to prepare students for postsecondary education and the workforce.[168]

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[159] See, for example, *ED 2009 Title I Reform Guidance,* Q&A C-1.

[160] For examples of professional development, see *ED 2009 Title I Reform Guidance,* Q&A C-5, E-6, and others.

[161] *ED 2009 Title I Reform Guidance,* Q&A C-8.

[162] *ED 2016 Schoolwide Guidance,* p. 4. Also see ESSA § 1114(c).

[163] *ED 2016 Schoolwide Guidance,* p. 4.

[164] *ED 2016 Schoolwide Guidance,* p. 4.

[165] *ED 2009 Title I Reform Guidance,* Q&A G-5.

[166] *ED 2016 Schoolwide Guidance,* p. 4.

[167] *ED 2016 Schoolwide Guidance,* p. 4. Also see ESSA § 1114(b)(7)(A)(iii)(II).

[168] *ED 2016 Schoolwide Guidance,* p. 4. Also see ESSA § 1114(b)(7)(A)(iii)(II).

- Equipment, materials, and training needed to **compile and analyze student achievement data** to monitor progress, alert the school to struggling students, and drive decision-making.[169]

- **Extended time for teachers** to review data for students at risk of not meeting academic standards.[170]

- **Response-to-intervention strategies** intended to allow for early identification of students with learning or behavioral needs and to provide a tiered response based on those needs.[171]

- Devices and software for students to access **digital learning materials** and collaborate with peers, and related training for educators (including accessible devices and software needed by students with disabilities).[172]

- High-quality **instructional materials**.[173]

- **A ninth grade academy** and/or programs to support the **transition to high school**.[174]

- **Library books**.[175]

- **Nonacademic supports** such as counseling, school-based mental health programs, specialized instructional support services, and mentoring services.[176]

A Title I school operating a *targeted assistance program* could spend Title I Part A funds on activities such as the following:

- **Any of the activities in the previous list** if the activities are limited to serving identified Title I students.[177]

- **Health, nutrition, and other social services** — such as eyeglasses, hearing aids, compensation for a coordinator, family support and engagement services, integrated student supports, and relevant technical assistance — if:

  - The services are not otherwise available to Title I students in the school,

  - The school has engaged in a comprehensive needs assessment and established a collaborative partnership with local service providers (if appropriate), and

  - Funds from other public or private sources are not reasonably available to pay for the services.[178]

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[169] *ED 2016 Schoolwide Guidance,* p. 5.

[170] *ED 2009 Title I Reform Guidance,* Q&A D-4.

[171] *ED 2016 Schoolwide Guidance,* p. 5.

[172] *ED 2016 Schoolwide Guidance,* p. 5.

[173] *ED 2009 Title I Reform Guidance,* Q&A C-8.

[174] *ED 2009 Title I Reform Guidance,* Q&A F-6.

[175] *ED 2009 Title I Reform Guidance,* Q&A G-13.

[176] ESSA § 1114(b)(7)(A)(iii)(I). Also see *ED 2016 Schoolwide Reform Guidance,* p. 5.

[177] See ESSA § 1115.

[178] ESSA § 1115(e)(2).

2. Using Title II Part A to Support Instructional Transformation

Title II Part A can support teachers, principals, and other school leaders in transforming instruction. ED encourages districts to align Title II Part A investments with "overall strategies to support effective instruction in order to improve student academic outcomes."[179]

ED guidance includes several examples of instructional transformation practices that Title II Part A can support, such as the following:

- "Time banks" or flexible time for collaborative planning, curriculum writing, peer observations, and leading trainings, which may involve using substitute teachers to cover classes during the school day.[180]

- Community-of-learning opportunities for principals and other school leaders to engage with their school teams to fully develop broad curriculum models.[181]

- Induction or mentoring programs for new educators, designed to improve classroom instruction and student learning and achievement and to increase the retention of effective educators.[182]

Other examples of activities Title II Part A can support include the following:

- **Reducing class size** to a level that is evidence-based (to the extent that evidence is reasonably available).[183]

- **Professional development for teachers and instructional leaders that is personalized,** high-quality, evidence-based,[184] and focused on improving teaching and student learning and achievement.[185] This professional development could focus on effectively integrating technology into curricula and instruction; using data to improve student achievement, consistent with privacy rules; effectively engaging parents, families, and the community; helping students to develop learning readiness and academic-success skills; developing policies with school, district, community, or state leaders; and experiential learning through observations.[186]

- Programs and activities that:

    – Increase effective instruction for **students with disabilities** and for **English learners**.[187]

    – Increase knowledge on instruction in the **early grades**.[188]

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[179] *ED 2016 Title II Guidance,* p. 26.
[180] *ED 2016 Title II Guidance,* p. 13.
[181] *ED 2016 Title II Guidance,* p. 15.
[182] *ED 2016 Title II Guidance,* p. 24.
[183] ESSA § 2103(b)(3)(D). Class size reduction must be evidence-based to the extent that the state, in consultation with districts, determines such evidence is reasonably available (ESSA § 2103(b)(3)(E)). The definition of "evidence-based" is available in ESSA § 8101(21).
[184] Personalized professional development must be evidence-based to the extent that the state, in consultation with districts, determines such evidence is reasonably available (ESSA § 2103(b)(3)(E)). The definition of "evidence-based" is available in ESSA § 8101(21).
[185] ESSA § 2103(b)(3)(E).
[186] ESSA § 2103(b)(3)(E)(i)–(vi).
[187] ESSA § 2103(b)(3)(F).
[188] ESSA § 2103(b)(3)(G).

- Provide training to support the identification of students who are **gifted and talented**.[189]

- Promote high-quality instruction and instructional leadership in **science, technology, engineering, and mathematics** subjects, including computer science.[190]

- Provide high-quality professional development for teachers on effective strategies to integrate rigorous academic content, career and technical education, and work-based learning to help **prepare students for postsecondary education and the workforce**.[191]

- Training related to **school conditions for student learning,** such as:

  - **Safety, peer interaction, drug and alcohol abuse, and chronic absenteeism**.[192]

  - Referrals for students affected by **trauma or mental illness**.[193]

  - How to **prevent and recognize child sexual abuse**.[194]

3. Using IDEA Part B to Support Instructional Transformation

IDEA Part B funds can support activities to meet the instructional and related needs of students with disabilities in the least restrictive environment.

ED recognizes that IDEA Part B funds could be used:

> . . . to support strategies that can contribute to high-quality curriculum and instruction aligned with State standards. Most of the . . . strategies could be used as part of comprehensive efforts to turn around low-performing schools.[195]

Examples of activities that IDEA Part B could support include the following:

- **Purchasing technology** hardware and software, consistent with the district's established technology integration plan, to improve achievement for students with disabilities and to increase their access to the curriculum.[196]

- Supporting the use of **assistive technology** (AT), including:

  - Purchasing AT devices and services for students with disabilities and providing training for teachers and other service providers, administrators, parents, and children;

  - Establishing AT labs or lending libraries with a collection of AT devices and materials for use in AT evaluations and training; and

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[189] ESSA § 2103(b)(3)(J).

[190] ESSA § 2103(b)(3)(M).

[191] ESSA § 2103(b)(3)(O).

[192] ESSA § 2103(b)(3)(I)(iv).

[193] ESSA § 2103(b)(3)(I)(i).

[194] ESSA § 2103(b)(3)(L).

[195] *ED 2009 IDEA Reform Guidance,* p. 16.

[196] *ED 2009 IDEA Reform Guidance,* p. 12.

– Providing training on how to conduct a systematic analysis of a child's specific needs and abilities, the environments in which the child must function, the tasks the child must perform, and the AT devices that may benefit the child.[197]

- **Universal Design for Learning** (UDL) approaches, including:

    – Purchasing assessments that utilize UDL approaches to ensure that assessments of students with unique learning needs are valid measures of their knowledge;

    – Planning and implementing new learning environments that are supportive of all learners within inclusive settings; and

    – Acquiring and implementing technologies and specialized formats for eligible students with print disabilities.[198]

- **Response-to-intervention** (RTI) activities, including:

    – Providing any special education and related services that are in a child's IEP, regardless of the tier the child is in;

    – Developing a strategy for implementing an RTI framework that provides guidance on tiers of instruction and the instructional approaches and programs appropriate for each tier, appropriate use of assessment data, supports needed for implementation, and evaluation of each approach's effectiveness; and

    – Purchasing instruments for curriculum-based screening, progress monitoring, and formative assessment, and purchasing curriculum materials for intensive instruction.[199]

- **Literacy interventions** for students with disabilities, including evidence-based reading programs and progress-monitoring tools.[200]

- **Math interventions** for students with disabilities, including evidence-based math screening instruments and intervention materials.[201]

- **Positive behavioral supports** for students with disabilities.[202]

- Supporting the **social and emotional development** of students with disabilities.[203]

- **Transition services** to support post-school employment or postsecondary education or training, such as transition-curriculum and career assessment, exploration, and development tools for students with disabilities.[204]

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[197] *ED 2009 IDEA Reform Guidance,* p. 14.

[198] *ED 2009 IDEA Reform Guidance,* pp. 16–18. To the extent that any of these activities are carried out for the benefit of all students, IDEA cannot pay for the whole cost.

[199] *ED 2009 IDEA Reform Guidance,* pp. 20–21. To the extent that any of these activities are carried out for the benefit of all students, IDEA cannot pay for the whole cost.

[200] *ED 2009 IDEA Reform Guidance,* pp. 22–23.

[201] *ED 2009 IDEA Reform Guidance,* pp. 24–25.

[202] *ED 2009 IDEA Reform Guidance,* pp. 26–27.

[203] *ED 2009 IDEA Reform Guidance,* pp. 28–29.

[204] *ED 2009 IDEA Reform Guidance,* pp. 30–31.

- **Data systems** to improve outcomes for students with disabilities, including

    - Progress monitoring tools;

    - Web-based IEPs;

    - Hardware and software to enhance current data systems or new data systems;

    - Consultants to address data challenges, including privacy concerns and cross-departmental technical and legal data transferability issues;

    - Building a local longitudinal data system that is interoperable with any existing statewide longitudinal data system; and

    - Merging separate special education data systems into existing elementary, secondary, postsecondary, and workforce systems.[205]

D. Using Federal Funds to Support Culture Shift (Domain 4)

As described in *Four Domains for Rapid School Improvement*, successful turnaround depends on a culture of high expectations and strong community cohesion. The framework identifies three practices that are central to effectively shifting the school culture:

Practice 4A: Build a strong community intensely focused on student learning

Practice 4B: Solicit and act upon stakeholder input

Practice 4C: Engage students and families in pursuing education goals

Following are examples of activities that are aligned to these practices and that can be supported with Title I Part A, Title II Part A, or IDEA Part B funds.

1. Using Title I Part A to Support Culture Shift

Title I Part A can support a variety of activities to support a culture of high expectations and school cohesion. ED recognizes that a common *misunderstanding* of Title I is that it limits the use of Title I funds only to instructional activities.[206] That is *not* a Title I requirement; in fact, Title I can be used for non-instructional activities that can help strengthen school culture and climate, and ESSA more explicitly clarifies this available use of the funds.[207]

Following are some examples of culture-shifting activities that could be supported with Title I Part A funds.

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[205] *ED 2009 IDEA Reform Guidance,* pp. 32–38. To the extent that any of these activities are carried out for the benefit of all students, IDEA cannot pay for the whole cost because IDEA funds must be used for the benefit of students with disabilities.

[206] *ED 2016 Schoolwide Guidance,* p. 6.

[207] See, for example, ESSA § 1114(b)(7)(A)(II), ESSA § 1114(e), and ESSA § 1115(f).

Title I Part A District-Level Spending

As described in Section II of this guide, districts *must* reserve Title I Part A funds for certain district-level activities. One of these mandatory reservations that can be used to positively affect school culture is the requirement for districts that receive at least $500,000 in Title I Part A funds to reserve at least 1 percent for **parent and family engagement activities**, which must include at least one of the following:

- Supporting schools and nonprofit organizations in providing **professional development** for district and school personnel on parent and family engagement strategies.

- Supporting **programs that reach parents and family members at home, in the community, and at school**.

- **Disseminating information on best practices** focused on parent and family engagement.

- **Collaborating with community-based organizations or employers** that have a record of success in improving and increasing family engagement.

- Other activities consistent with the district's parent and family engagement policy.[208]

In addition, a district could choose to reserve funds for discretionary district-managed activities in all, or a subset of, its Title I schools to support positive culture-shift activities such as the following:

- **Additional parental involvement** activities, which could include:

  - Weekly courses to parents of Title I students on strategies and materials they can use at home to help their children improve reading skills.

  - Conducting in-home visits to provide parents of Title I students with assistance on activities to improve their children's academic achievement.

  - Expanding a parent resource room to increase the bilingual materials available for parents of Title I students who are English learners.

  - Installing computers that parents of Title I students can use to access online instructional materials.

  - Operating a parent leadership academy for parents of Title I students.

  - Conducting forums throughout the school year to support parents of Title I students who will be transitioning from middle to high school.[209]

- **Professional development** to build the capacity of personnel in Title I schools to work effectively with families and to build ties between parents and the schools,[210] as well as other **professional development activities to improve school culture and climate**.

- **Other district-managed culture-shift activities** carried out in all, or a subset of, the district's Title I schools (activities could include, but are not limited to, the types of

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[208] ESSA § 1116(a)(3).
[209] *ED 2009 Title I Reform Guidance,* Q&A G-8.
[210] *ED 2009 Title I Reform Guidance,* Q&A G-7.

activities described in the following section for schoolwide-program schools, but instead managed by the district and carried out in one or more Title I schools).[211]

Title I Part A School-Level Spending

A Title I school operating a **schoolwide program** could, if consistent with the school's needs assessment and schoolwide plan, spend Title I Part A funds on activities such as the following:

- **Parent and family engagement** activities as described in the lists of activities for district-level spending.[212]

- **Family literacy** programs.[213]

- **Attendance-incentive** programs.[214]

- **Recognition events** that highlight successful student academic performance.[215]

- Activities that **reinforce positive school values**, such as student-led conflict resolution programs, peer juries, and peer mediation.[216]

- **Student-advisory systems** that connect teachers and other adults in the school to small groups of students.[217]

- **Opportunities for students to participate in setting classroom and school goals** and to collaborate through, for example, service learning and peer tutoring.[218]

- **Professional development** to help staff address bullying, harassment, and social isolation, and to help staff to foster a greater sense of belonging and connectedness to the school among Title I students and families.[219]

- **School-based data-gathering,** such as through surveys to assess students' connectedness to and sense of safety at school.[220]

- Creating time within the school day for **teacher collaboration**.[221]

- Coordinating **health, nutrition, and social services** with local service providers.[222]

- **Counseling** and **school-based mental health** programs.[223]

- **After-school homework-support** programs.[224]

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[211] *ED 2009 Title I Reform Guidance*, particularly Sections C, E, and G.

[212] ESSA § 1116; *ED 2009 Title I Reform Guidance,* Q&A G-7.

[213] ESSA § 1116(e)(7); *ED 2009 Title I Reform Guidance,* Q&A F-5.

[214] *ED 2009 Title I Reform Guidance,* Q&A E-15.

[215] *ED 2009 Title I Reform Guidance,* Q&A E-15.

[216] *ED 2009 Title I Reform Guidance,* Q&A E-15.

[217] *ED 2009 Title I Reform Guidance,* Q&A E-15.

[218] *ED 2009 Title I Reform Guidance,* Q&A E-15.

[219] *ED 2009 Title I Reform Guidance,* Q&A E-15.

[220] *ED 2009 Title I Reform Guidance,* Q&A E-15.

[221] *ED 2009 Title I Reform Guidance,* Q&A G-5.

[222] *ED 2009 Title I Reform Guidance,* Q&A F-5.

[223] ESSA § 1114(b)(7)(iii)(I).

[224] *ED 2009 Title I Reform Guidance,* Q&A F-5.

- Activities to make students aware of, and prepare them for, **postsecondary education and the workforce**.[225]

A Title I school operating a **targeted assistance program** could spend Title I funds on these activities if the activities are limited to serving identified Title I students.[226]

2. Using Title II Part A to Support Culture Shift

Title II Part A can support activities to help teachers, principals, and other school leaders create a culture of high expectations and to help them foster community cohesion.

ED recognizes that Title II Part A can be part of a positive culture shift that leads to improved student outcomes when Title II Part A funds are used effectively on strategies such as induction and mentorship,[227] evaluation and support, [228] teacher and school leadership,[229] a diverse educator workforce,[230] and attracting and retaining excellent educators in high-need schools.[231]

Examples of activities that Title II Part A can support include the following:

- A **mentoring and induction** program that provides early release time for mentoring, compensation for mentors, and evidence-based professional development for novice educators and mentors.[232]

- **Career opportunities and advancement initiatives for effective teachers to promote professional growth** and emphasize multiple career paths, including by creating hybrid roles that allow instructional coaching of colleagues while remaining in the classroom, as well as assuming other responsibilities such as collaborating with administrators to develop and implement distributive leadership models and leading decision-making groups.[233]

- **Community-of-learning opportunities and other professional development opportunities with diverse stakeholder groups** such as parents, civil rights groups, and administrators, to positively impact student outcomes — for example, through a forum to discuss the implication of a policy or practice on a school community, or organizing a communitywide service learning project and follow-up in which teachers work together to embed learnings from these activities into their teaching.[234]

- **Professional development** aimed at cultural competency and responsiveness, as well as equity coaching to improve conditions for all educators and students, including educators and students from underrepresented minority groups, diverse national origins, English language competencies, and varying genders and sexual orientations.[235]

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[225] ESSA § 1114(b)(7)(A)(iii)(II).

[226] See ESSA § 1115(b)(2). Also see *ED 2009 Title I Reform Guidance,* Q&A E-15.

[227] *ED 2016 Title II Guidance,* pp. 9–10.

[228] *ED 2016 Title II Guidance,* pp. 11–13.

[229] *ED 2016 Title II Guidance,* pp. 13–17.

[230] *ED 2016 Title II Guidance,* pp. 17–19.

[231] *ED 2016 Title II Guidance,* pp. 23–24.

[232] *ED 2016 Title II Guidance,* p. 10.

[233] *ED 2016 Title II Guidance,* p. 14.

[234] *ED 2016 Title II Guidance,* p. 14.

[235] *ED 2016 Title II Guidance,* p. 19.

- **Career advancement opportunities for current staff members, such as paraprofessionals, who have worked in the community for an extended period of time**, to support their efforts to gain the requisite credentials to become classroom instructors.[236]

- **Strategies and systemic interventions designed to better attract, place, support, and retain effective educators who are culturally competent and culturally responsive,** especially educators from underrepresented minority groups; this effort may include having personnel or staff time dedicated to recruiting diverse candidates of high quality who can best teach to the diversity of the student population.[237]

- **Incentives for effective educators to teach in high-need schools** and ongoing incentives for such educators to remain and grow in such schools.[238]

- **Feedback mechanisms to improve working conditions**, including periodically and publicly reporting feedback on educator support and working conditions, which may leverage teacher leadership and community partners.[239]

- **Improvements to working conditions for teachers** through high-impact activities based on local needs, such as improving access to educational technology, reducing class size to a level that is evidence-based (to the extent the state determines that such evidence is reasonably available), or providing ongoing cultural-proficiency training to support a stronger school climate for educators and students.[240]

3. Using IDEA Part B to Support Culture Shift

IDEA Part B can support activities to create a culture of high expectations for students with disabilities.

Examples of activities that IDEA Part B can support include the following:

- Job-embedded **professional development** for all teachers who work with students with disabilities, including time for collaboration.[241]

- **Universal Design for Learning**, a framework that, among other things, maintains high achievement expectations for all students, including students with disabilities and students who are limited English proficient.[242]

- A schoolwide **data system that measures school climate** in a rigorous way so that progress can be assessed and measured.[243]

- Implementing **behavior interventions and positive behavioral supports** to improve school climate.[244]

- **Secondary transition services**, including career assessment, exploration, and development tools, for students with disabilities.[245]

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[236] *ED 2016 Title II Guidance,* p. 19.
[237] *ED 2016 Title II Guidance,* p. 19.
[238] *ED 2016 Title II Guidance,* p. 23.
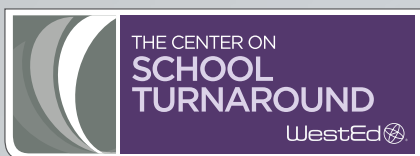[239] *ED 2016 Title II Guidance,* p. 24.
[240] *ED 2016 Title II Guidance,* p. 24.
[241] *ED 2009 IDEA Reform Guidance,* pp. 6–15.
[242] *ED 2009 IDEA Reform Guidance,* pp. 16–19.
[243] *ED 2009 IDEA Reform Guidance,* p. 28.
[244] *ED 2009 IDEA Reform Guidance,* pp. 27–28.
[245] *ED 2009 IDEA Reform Guidance,* p. 31.

SUPPORT FOR RAPID SCHOOL IMPROVEMENT: HOW FEDERAL DOLLARS CAN BE LEVERAGED FOR SYSTEMIC IMPROVEMENT