

May 26, 2004

VIA FACSIMILE AND FIRST CLASS MAIL

Raymond J. Simon
Assistant Secretary
Office of Elementary and Secondary Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Dear Assistant Secretary Simon:

I am writing to obtain clarification on questions concerning setting aside and tracking Title I, Part A funds for school improvement and parental involvement activities in schoolwide program schools.

As you are aware, schoolwide program schools may consolidate their Title I, Part A allocation with other federal, state, and local funds to improve the entire educational program of the school. Schoolwide program schools are not required to separately track their Title I, Part A funds to specific activities. Neither do schools need to meet the statutory or regulatory requirements of Title I, Part A. Instead, schools “must meet the intents and purposes of that program to ensure the needs of the beneficiaries of that program are addressed.” 34 CFR § 200.29(b)(1)(ii).

In light of this authority, your guidance on the following questions would be of immense assistance to SEAs and LEAs throughout the Nation:

1. In general, a school identified for school improvement must develop or revise a school plan. See § 1116(b)(3). The plan must include an assurance the school will spend at least 10% of its Title I, Part A allocation on professional development. If a schoolwide program school is identified for school improvement, must it develop a school plan? Must the school set aside and separately track 10% of its Title I, Part A allocation for professional development?
2. An LEA must reserve at least 1% of its Title I, Part A allocation for parental involvement. At least 95% of the reservation must be distributed to schools

served under Part A. Schools are required to spend these reserved funds on parental involvement activities. See § 1118(a)(3). Must a schoolwide program school separately track these Title I, Part A funds to parental involvement activities? Must the school provide the specific parental involvement activities specified in the statute and regulations, or may it meet the intents and purposes of the parental involvement requirements?

I greatly appreciate your attention to these questions. As we enter the implementation phase of NCLB, it will be critical that States and districts are able to access responses to these crucial questions. Thank you in advance for your prompt assistance.

Sincerely,

Leigh M. Manasevit

Cc: Jackie Jackson
Acting Director, Student Achievement
and School Accountability Programs