



Coordinating Title I Schoolwide Programs with 1997 Amendments to the Individuals with Disabilities Education Act (IDEA '97)

by

Beverly Mattson, Ph.D.
and
Sharon Beckstrom, Ed.D.

RMC Research Corporation
1815 North Fort Myer Drive
Suite 800
Arlington, VA 22209
(703) 558-4800 (Main Number)
(888) RMC-4200 (Toll Free)

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Dr. Beverly Mattson and Dr. Sharon Beckstrom
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The 1997 Amendments to the Individuals with Disabilities Education Act (IDEA '97) (P.L. 105-17) included several significant changes which affect the coordination of IDEA '97 with other federal education legislation and the inclusion of students with disabilities in general education reform and district-level and state-level assessments. Some of these changes now allow Title I Schoolwide Programs under the Elementary and Secondary Education Act (ESEA) and the Improving America's Schools Act (IASA) (P.L. 103-382) to combine IDEA Part B funds with other federal funds to upgrade a school's entire program of instruction and to raise the achievement of all students.

This review will first briefly cover the most relevant aspects and regulations of Title I Schoolwide Programs and IDEA '97 related to their coordination. Second, it will define and describe what is meant by coordinated activities and services, provide examples, and briefly discuss the associated issues and challenges. Third, we will identify what is needed to support coordination across federal, state, and local levels. Fourth, we will present recommendations for states, local education agencies, and schools that are interested in coordinating IDEA '97 and Title I Schoolwide Programs. Finally, it will highlight the benefits associated with this coordination.

Title I of the Elementary and Secondary Education Act

Title I is the largest federal education program reaching more than 11 million students in 95% of the nation's highest poverty schools (Final Report of the National Assessment of Title I). Eighty-one percent of all participants in 1994-95 were enrolled in prekindergarten through 6th grade and primarily served in reading/language arts and mathematics (Billig, 1998). Of the eleven million children served by Title I, approximately 1 million or 9% are identified as disabled under IDEA (LeTendre, 1999).

Schoolwide Programs under Title I of the Elementary and Secondary Education Act

All schools with 50% poverty or greater are eligible to develop schoolwide programs. Schoolwide Programs account for 33% of all Title I Schools (McClure, 1999). Currently, there are 15,000 Title I Schoolwide Programs in the country (LeTendre, 1999).

Schoolwide Programs are allowed to combine federal aid under Title I with other federal, state, and local funds to upgrade the entire program in a school (Verstegen, 1995). Schoolwide programs have four distinct advantages:

- (1) Flexibility in comprehensively redesigning the whole school;
- (2) Greater coordination and integration of services, staff, and resources;
- (3) Coordinated accountability for reaching high standards; and,
- (4) Unified goals for comprehensive reform (U.S. Department of Education, 1998).

Co-Existence of Title I and IDEA in Schools

Since IDEA and Title I programs co-exist in about 75% of all public elementary schools in the nation (LeTendre, 1998), IDEA '97 represents a new opportunity for integrating general and special education personnel, services, and funding through Title I Schoolwide Programs. Students with learning disabilities constitute the largest population of students with disabilities and exhibit learning difficulties most similar to those receiving Title I services (U.S. Department of Education, 1993a). Thus, the coordination of IDEA '97 with Schoolwide Programs provides new opportunities for increasing the numbers of students with disabilities accessing the general curriculum through the sharing and coordination of personnel, services, and resources.

Changes in the 1997 Amendments to IDEA

As mentioned earlier, the 1997 Amendments to the Individuals with Disabilities Education Act (IDEA '97) (P.L. 105-17) included a number of changes in fiscal policy and regulations, service delivery and coordination, and the promotion of involvement in general education curriculum, which facilitate greater coordination with other federal education legislation, especially the Elementary and Secondary Education Act. Each of these will be briefly described.

IDEA '97 Fiscal Changes

IDEA '97 included a new stipulation that local education agencies (LEAs) may use Part B IDEA funds for any fiscal year as long as the amount of Part B funds do not exceed the total number of children with disabilities in Schoolwide Programs (under the 1994 Improving America's Schools Act (P.L. 103-382) multiplied by the amount of Part B funds received by the LEA and divided by the number of children with disabilities in the LEA's jurisdiction (Section 613(a)(2)(D) of the statute and Section 300.234 of the final federal regulations). In other words,

$\frac{\text{Part B IDEA funds received by an LEA}}{\text{\# of students with disabilities in the LEAs jurisdiction}} \times \text{\# of students with disabilities in Schoolwide Programs}$
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Because the statute does not address how districts will allocate these funds to specific schools with Schoolwide Programs, staff may need to contact their district office for local information. It is also recommended that staff check with state and local regulations as state special education funding formulas and use of funds vary by state.

Use of Funds. The federal funds must be used to supplement state, local, and other federal funds and not supplant such funds.

However, a school that combines funds under Part B of IDEA may use those funds for any activities under its Schoolwide Program as long as it complies with the requirements of Part B of IDEA '97, particularly the provision of services according to a properly developed Individualized Education Program (IEP), and that all rights and services are guaranteed to eligible children under IDEA '97.

Additional Funds Available for Coordinated Services. Local education agencies may use up to 5% of their Part B funds to develop and implement a coordinated service system to improve the results for children and families. Activities may include:

- (1) improving the effectiveness and efficiency of service delivery and personnel development for individuals working on coordinated services;
- (2) service coordination and case management;
- (3) developing interagency financing strategies;
- (4) interagency personnel development; and
- (5) coordination with Title XI, Coordinated Services, of the Elementary and Secondary Education Act (Section 300.244 of the final IDEA '97 federal regulations).

(Title XI allows LEAs, schools, and consortia of schools to use 5% or less of ESEA funds to develop, implement, or expand coordination services that increase access to social, health, and educational services).

Changes in Delivery of Services (Incidental Benefit)

Section 613(e)(1)(B) of IDEA '97 allows Part B funds to be used for special education and related services and supplementary aids and services in a general education class to a child with a disability, even if one or more nondisabled children benefit from these services. In other words, special educators are permitted to not only serve disabled students but may provide incidental benefits to nondisabled students as well.

Greater Involvement and Participation of Students with Disabilities in General Education Classes and Curriculum

IDEA '97 also promotes greater involvement and participation of students with disabilities in general education classes and curriculum through the provision of special education, related services, and aids and supports. Changes in Individualized Education Programs (IEPs), as well as greater involvement of general education teachers in the development of IEPs, provide new opportunities for the coordination of special education and general education personnel. This is particularly relevant to Title I Schoolwide Programs.

Title I Schoolwide Programs

When compared to Title I targeted assistance programs, Schoolwide Programs have much more flexibility in determining how to spend their Title I, Part A funds and other federal funds. The types of added flexibility offered by Schoolwide Programs follows:

- (1) Schoolwide Programs do not have to identify specific children as eligible for services.
- (2) Schoolwide Programs do not have to show that Title I, Part A funds are paying for supplemental services that would otherwise not be provided.
- (3) Schoolwide Programs focus on increasing the achievement levels for all children served in the school.
- (4) Schoolwide Programs may combine Title I, Part A funds with other federal funds in support of the Schoolwide Program.
- (5) Federal education funds that are included in a Schoolwide Program do not have to be accounted for separately and may be combined with state and local funds.
- (6) Schoolwide Programs do not have to conform to the specific statutory or regulatory requirements of each of each separate federal program as long as the intent and purposes of those programs are met.

Prior to becoming a Schoolwide Program, a school is required to spend one year conducting a comprehensive needs assessment and planning the most effective program to meet the school's identified needs. If a school has recently completed a comprehensive needs and site-based planning, part of the year planning period may be waived.

Education Program Funds Which May be Combined in a Title I Schoolwide Program

The following federal programs under ESEA may be combined in a Schoolwide Program:

- | | |
|------------------|--|
| Title I, Part A: | Helping Disadvantaged Children Meet High Standards, Improving Basic Programs Operated by Local Education Agencies; |
| Title I, Part B: | Even Start Family Literacy; |
| Title I, Part C: | Education of Migratory Students; |
| Title I, Part D: | Neglected, Delinquent or At Risk Youth; |

Title II:	Eisenhower Professional Development;
Title III, Part A, Subpart 2:	Technology for Education;
Title IV:	Safe and Drug-Free Schools;
Title V:	Magnet Schools;
Title VI:	Innovative Education Programs;
Title VII:	Bilingual Education;
Title VIII:	Impact Aid; and,
Title IX:	Indian Education.

Other federal programs may also be combined in a Schoolwide, and these include: Title VII of the Stewart B. McKinney Homeless Assistance Act: Education for Homeless Children and Youth; Goals 2000: Education America Act; School-to-work Opportunities Act; Perkins Vocational Education Act, and IDEA, Part B.

States differ as to which federal programs they require schools to include in a Schoolwide Program and which they encourage schools to include. In addition, states identify specific state programs which a school should combine with the federal programs in a Schoolwide Program.

Accountability and Compliance in Title I Schoolwide Programs

A Title I Schoolwide Program school must meet the intent and purposes of the federal programs from which funds are combined to ensure that the needs of the intended beneficiaries of those programs are addressed. Therefore, the school must be able to demonstrate that its schoolwide program contains sufficient activities to reasonably address those needs and thus meet the intent and purposes of each program.

A Title I Schoolwide Program school is not required to focus federal education funds on particular children, as all children are eligible to participate in all aspects of a Schoolwide Program. However, the schools must know which children have special needs because they are, for example, migrant, or limited English proficient, or at risk of failing to meet state academic and performance standards and meet the needs of these children. In addition, the school must be able to disaggregate data on its final state assessment.

While Schoolwide Programs have great flexibility, they must comply with the following requirements applicable to individual federal programs:

- (1) health and safety requirements;
- (2) civil rights requirements;
- (3) gender equity requirements;
- (4) participation and involvement of parents and students;
- (5) participation of private school children, teachers and other educational personnel;
- (6) maintenance of effort;
- (7) comparability of services; and
- (8) supplement not supplant provisions.

The provisions of Title I Schoolwide Programs provide opportunities for students with disabilities and special educators in schools with high concentrations of low-income students to be fully involved and integrated into school-level reform efforts.

Coordinating Title I Schoolwide Programs and IDEA '97

Coordinating Title I Schoolwide Programs and IDEA '97 involves a spectrum of activities that promote the appropriate integration of personnel and services from several federal and state categorical funding streams (e.g., Schoolwide Programs and IDEA '97) into a more unified approach designed to meet the needs of all students (adapted by Mattson from Versteegen, 1995). Some of the general activities undertaken by a state, district, or school may involve:

- (a) revising policies and procedures including: policy analyses, clarification, and development;
- (b) analyses and development of fiscal policy and accountability;
- (c) analyses of service delivery standards and models and their effectiveness and identifying and redefining service delivery models;
- (d) analyses of and changes in personnel roles, responsibilities, and professional relationships; staffing patterns and allocations;
- (e) planning and reconceptualizing activities;
- (f) professional development; and
- (g) re-allocation of resources.

Examples of Coordinated Approaches

Forward thinking states, districts, and schools have already moved toward the coordination and consolidation of resources.

Examples of State Approaches

States have primarily provided grants to districts and/or schools for coordinated efforts, instituted a coordinated, compliance review process, or promoted fiscal blending for special programs. For example, Washington, Michigan, Massachusetts, California, and Vermont provided state restructuring block grants to school districts to restructure and/or consolidate categorical programs (Carlson & O'Reilly, 1996; McLaughlin, 1995). California is using a coordinated, compliance review process of all categorical programs (e.g., Title I, special education, and bilingual education) at one time (McLaughlin, 1995).

Nebraska developed a model combination program to encourage LEAs to blend categorical funding streams to serve preschoolers. While Nebraska does not allow commingling of funds, it does allow certain program costs to be shared on a pro-rated basis (Carlson & O'Reilly, 1996). For example, the Centura, Nebraska, Public Schools blends funds from Title I, Head Start, special education, and parent payments for preschool services.

Examples of District Approaches.

Districts have used four general approaches: (1) special projects; (2) case by case evolutionary process; (3) comprehensive phased-in approach; or (4) complete conversion. In a 1995 review, McLaughlin found that LEAs were using the following strategies to support the consolidation of special education services and funding with other resources:

- (a) school improvement plans,
- (b) consolidated staffing plans,
- (c) Schoolwide Title I Programs,
- (d) consolidated grant applications for all categorical funds,
- (e) sharing of professional development resources across categorical programs,
- (f) coordinated compliance reviews, and
- (g) restructuring initiatives.

By 1998, McLaughlin and Verstegen found that LEAs were also:

- (a) blending personnel and instruction but not funds;
- (b) promoting collaboration between instructional staff;
- (c) funding teachers and aides from multiple sources to serve diverse groups of students; and
- (d) providing "block grants" to schools based on the numbers of students.

Examples of School Approaches.

Schools have implemented a variety of approaches to coordinate services and personnel between special education, Title I, and other categorical programs to improve educational opportunities for all students. For example, the Montview Elementary School in Aurora, Colorado, combined Title I, Part A funds with funds from Title VII, Bilingual Education, Migrant Education, IDEA, a National Education Association grant, and various state and local funds to implement the Literacy Learning Model in all classes. All ESL and special education staff were involved in developing the Schoolwide Program and in professional development. Students with limited-English-proficiency or disabilities have specialized, in-class assistance (U.S. Department of Education, 1998).

In some schools, special education and Title I services are delivered and maintained separately for part of the school day with instructional staff collaborating for part of the school day to serve heterogeneous groups of students. For example, Samuel Mason Elementary School in Boston, Massachusetts, uses a team of Title I, special education, and Reading Recovery educators to work with grade level clusters in the morning and with six kindergarten and early childhood teachers in the afternoon.

Other schools have services delivered by specialists within the general education classes. Ganado Primary School in Ganado, Arizona, a 1997 nationally recognized Title I Schoolwide Program, developed the Collaborative Literacy Intervention Program, integrating reading, writing, and problem solving. This Program fully integrates Title I, special education, and English-as-a-Second-Language services into general education classes.

The Independence, Missouri, School District developed an integrated reading program that combined general and special education strategies for grades Kindergarten through 2nd. This program was co-taught by general education, special education, and/or Title I teachers (personal correspondence with Toni Strieker, 1999). The results of a study of the first year of implementation in Independence revealed that student reading achievement significantly increased and that referrals to special education decreased significantly (personal correspondence with Toni Strieker, 1999).

On some occasions, Title I staff and special educators provide direct and indirect consultation to general educators. In other situations, teams of instructional staff, including special educators and Title I staff, use a variety of cooperative teaching approaches to serve the needs of heterogeneous groups of students. A third model is the formation of resource centers staffed by teachers funded by several categorical programs depending on the needs and numbers of students identified.

Issues and Challenges

Why haven't more districts and schools developed coordinated services between Title I and IDEA? Some of the major issues and challenges identified by McLaughlin & Verstegen (1998) included: (a) regulations governing fiscal accountability, particularly the nonsupplant requirements; (b) a lack of understanding of the difference between what is and is not required by law and what is the tradition of local practice; and (c) lack of a cohesive state and federal policy framework, particularly a lack of a unified vision of program services. In fact, Verstegen (1995) found that the chief obstacle to greater coordination and integration between programs was the incentives and disincentives associated with finances, including the regulations on categorical funding streams. Other issues include the following:

- leadership variables (state and local administrators' knowledge, commitment, attitudes, and coordination) (McLaughlin, 1995);
- attitudinal barriers (e.g., turf issues, fear that funds and services will be redirected);
- organizational barriers (e.g., separate and distinct programs, policies, and procedures);
- different philosophies and local practices (Verstegen, 1995);
- fiscal incentives favoring segregated and separate placements for students;
- a lack of knowledge of alternative service delivery models and approaches; and
- state and local rules and accounting systems that do not allow the combining of funds (Rasa, 1999).

What is Needed at all levels to Support the Coordination of Title I Schoolwide Programs and IDEA '97

A Thorough, Authoritative Review of Administrative Rules. McLaughlin and Verstegen (1998) suggest that there is a need for a thorough and authoritative review of all administrative rules related to fiscal accountability for all federal categorical aid programs, including the identification of specific accounting and program monitoring requirements for LEAs and a delineation of how these provisions interact, conflict, or allow local flexibility.

Leadership. McLaughlin and Verstegen (1998) found that program leadership at all levels is critical in moving toward coordinating personnel, services, and funding. A clear and cohesive "vision" of coordinated services needs to be reflected in state regulations and local program administration structures (McLaughlin & Verstegen, 1998). McLaughlin (1995) documented that every attempt to create a different service delivery model resulted from leadership at the grass roots and a commitment to change.

Carlson and O'Reilly (1996) found in their study of four LEAs, that the success of coordinated approaches largely depended on the vision and leadership of a single individual within a district who had experience with multiple categorical programs and promoted integrated service delivery. What worked best was when local program administrators met together regularly to develop a common vision for how educational programs should be configured, with the vision guided by common goals or learner outcomes (McLaughlin, 1995).

Formal, Analytical Planning Processes to Redesign the Delivery of Services and Allotment of Personnel. Mattson, working with local administrators in the OSEP-funded Virginia Statewide Systems Change Project (1989-1991) and with eleven Louisiana school districts (1998), found that administrators need formal analytical, planning processes to analyze and reconfigure services and staff for the inclusive education of students with disabilities. For example, in the Virginia Statewide Systems Change Project, Mattson worked with eight districts and eleven schools to redesign services for students with moderate/severe disabilities from traditional, segregated pull-out service delivery models to integrated and inclusive education models. The processes included the examination and analyses of:

- (1) State and district standards for special education programs and delivery of services;
- (2) Current descriptions of roles and responsibilities of special educators, other specialists, and paraprofessionals and implications for special educators, including the training and supervision of paraprofessionals required from special educators;
- (3) Intensity and range of student needs documented on the Individualized Education Programs (IEPs) of students;

- (4) Scheduling of classes and integration opportunities for students with disabilities as well as the coordination of schedules of educators for joint planning; and
- (5) Types of services offered, service delivery approaches, and coordination of services between special educator and related services and between special educator and any other specialists in the school.

Multi-Level Administrative Support. Support from the superintendent, the school board, and/or the state education agency were important for successful implementation of coordinated services (Carlson & O'Reilly, 1996; McLaughlin, 1995; McLaughlin and Verstegen, 1998). Involvement of the state education agency, particularly through grants to LEAs to develop alternative service models, was also identified as critical to success (Carlson & O'Reilly, 1996).

Some Recommendations for States Considering the Coordination of IDEA '97 and Title I Schoolwide Programs

From the review of the literature as well as our professional experience, we have developed recommendations for state and local education agencies and schools. Some of the recommendations for state education agencies include the following:

- (1) **Provide leadership.** McLaughlin & Verstegen (1998) found that program leadership at all levels is critical in moving toward the coordination of personnel, services, and funds. A clear and cohesive "vision" of coordinated services needs to be reflected in state regulations and local program administration structures (McLaughlin & Verstegen, 1998).
- (2) **Analyze and clarify relevant policies and procedures regarding program and personnel standards, service delivery, and fiscal management and accountability.** McLaughlin and Verstegen (1998) suggest there is a need for a thorough and authoritative review of all fiscal accountability and administrative rules for all federal categorical aid programs, including the identification of specific accounting and program monitoring requirements for LEAs and a delineation of how these provisions interact, conflict, or allow local flexibility. Differentiate between state and federal regulations regarding coordinated services. Clarify program regulations that allow for coordinated services and identify how much flexibility should be given to LEAs and schools and what would be permissible regarding local flexibility in delivering services.

- (3) **Develop a framework on how Schoolwide Programs and IDEA could be reconceptualized and coordinated.** A framework is needed that will guide LEAs and schools in reconceptualizing categorical programs and services and identifying alternative service delivery models. Verstegen (1995) found that since local administrators appeared to have complex and diverse perceptions of what program flexibility meant, they wanted a state-level edit on how services and resources could be blended and what collaborative models would look like.
- (4) **Use formal, analytical planning processes to reconceptualize categorical programs and services and identify alternative service delivery models.** Working with schools and districts in Virginia and Louisiana, Mattson found that district and school personnel need formal analytical processes to examine student needs and IEPs; reconfigure service delivery models and personnel to best meet students' needs; and implement coordinated approaches.
- (5) **Provide incentive grants to LEAs for the development of exemplary models of coordinated services.** In the reviews by Carlson and O'Reilly (1996) and McLaughlin (1995), local education agencies made significant progress when states provided additional grants for planning and professional development. Now, states may use 1% of state set-aside IDEA Part B funds for developing coordinated services. In turn, LEAs may use 5% of IDEA Part B funds for coordinating services.
- (6) **Provide time for joint planning at all levels** The planning should include administrators and practitioners representing Title I, general and special education, auditors, and fiscal managers from all levels — state, district, and school. McLaughlin (1995) found that administrators recommended joint planning and collaboration as key parts of coordinating efforts.

Recommendations for Districts

Based on a review of the literature and our professional experiences, we recommend that local education agencies:

- Provide leadership and time for joint planning at the district and school levels;
- Reexamine the assignment of students with disabilities to schools (particularly if students are not being educated in their neighborhood schools);
- Analyze district policies and procedures (particularly fiscal, personnel roles and responsibilities, and service delivery);
- Analyze current service delivery models used in Title I, special education, and related services, and their effectiveness;
- Reexamine roles and responsibilities of staff, staffing patterns, and current allocations of personnel and make changes as needed for better coordination;
- Explore alternative funding options and fiscal auditing and accountability requirements; and
- Provide ongoing administrative support to schools interested in developing models of coordinated services.

Most important, provide professional development to administrators and educators who will be involved in the coordination of services, personnel, and resources (e.g., on alternative service delivery models, teaming, cooperative teaching).

Recommendations for Schools

We also developed recommendations for schools based on our professional experiences and the review of literature. Our recommendations are:

- Identify current available staff (including all teachers, specialists, related services personnel, and paraprofessionals) and any local/state restrictions/regulations that may impact how staff are utilized;
- Examine roles and responsibilities of teachers, specialists, and paraprofessionals and see if any changes need to be made regarding coordination;
- Analyze student needs (including Individualized Education Programs), what types of supports and modifications are needed, and the range of needs by grades, subjects, and levels;
- Examine the current assignment of students with and without disabilities to grades and classes and see if any changes need to be made to support coordination;
- Explore and/or adopt alternative models of service delivery. Explore different models of cooperative teaching and decide which models are appropriate for the school;
- Provide joint planning time for all personnel involved in the coordination; and
- Provide ongoing support.

Again, we would like to emphasize how important professional development is to all personnel who will be involved in the delivery and coordination of services. For example, administrators and teachers need information and training on cooperative teaching approaches and different service delivery models and their implications for scheduling, planning, and staffing.

Benefits Associated with the Coordination of IDEA '97 and Schoolwide Programs

Some benefits associated with consolidated services and funding were identified by McLaughlin (1995), McLaughlin and Versteegen (1998), and Versteegen (1995). The identified benefits included:

- (1) more comprehensive, coordinated services for all students;
- (2) teams of educators educating more students together in general education classes;
- (3) increased ownership of all students; and
- (4) more efficient program management that yielded fiscal savings.

We believe there are additional benefits that include:

- (1) increased flexibility in meeting the diverse needs of all students;
- (2) more flexible team approach of personnel and the provision of services;
- (3) increased sharing of strategies between teachers and paraprofessionals;
- (4) reduction of stigmatization of children with special needs;
- (5) greater access to more rigorous general education curriculum by all students;
- (6) increased inclusion of all students in district and state wide accountability systems; and
- (7) more efficient use of personnel and funds to meet the needs of all students.

In addition, evaluations and research studies of inclusive education programs have documented a variety of benefits for students with and without disabilities, including: (1) improved social interactions, friendships, and acceptance; (2) improved social competence and communication skills of students with disabilities; and (3) higher levels of engaged learning time (Lipsky & Gartner, 1997; McGregor & Vogelsberg, 1998).

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