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# Title I Policy

The Governing Board of The Cottonwood School (the "Charter School") desires to provide a high-quality education that enables all students to meet challenging state academic standards. Title I funds received by Charter School shall be used to support effective, evidence-based educational strategies that close the achievement gap and enable the students to meet the state's challenging academic standards. Charter School shall use Title I funds to supplement, not supplant, funds made available from state and local sources. (20 U.S.C. §§ 6314, 6321)

# Local Educational Agency ("LEA") Plan

Charter School shall develop its Title I LEA plan in accordance with applicable state and federal law and with timely and meaningful consultation with teachers, principals, administrators, other school leaders, paraprofessionals, specialized instructional support personnel, other appropriate school personnel, and parents/guardians of Charter School's participating students. The Executive Director or designee shall present this plan and any revisions to the Governing Board for approval. Charter School shall periodically review and, as necessary, revise its plan. (20 U.S.C. § 6312)

Pursuant to Education Code Section 64001(j) Charter School may use its Local Control and Accountability Plan ("LCAP"), with the inclusion of Title I, Part A funded expenditures, and the educational partner requirements in Education Code Section 52062(a), to serve as the School Plan for Student Achievement ("SPSA") to meet federal school planning and educational partner requirements.

Charter School shall develop and implement a written parent and family engagement policy as required by 20 U.S.C. § 6318.

### Schoolwide Program

A LEA that receives Title I, Part A funds shall operate one of two programs:

- Schoolwide Program ("SWP"); or
- Targeted Assistance School ("TAS") program.

A school may operate a Title I SWP if:

- The school's LEA determines that the school serves an eligible attendance area or is a participating school under Section 1113 of the ESEA; and
- For the initial year of the schoolwide program:
  - The school serves a school attendance area in which not less than 40 percent of the children are from low-income families; or

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o Not less than 40 percent of the children enrolled in the school are from low-income families (20 U.S.C. § 6314; 34 C.F.R. § 200.25)

A school that does not meet the above criteria may operate a Title I SWP if it receives a waiver from the California Department of Education to do so, after taking into account how a schoolwide program will best serve the needs of the students in the school in improving academic achievement and other factors. (20 U.S.C. § 6314)

The purpose of a SWP is to improve academic achievement throughout a school so that all students, particularly the lowest-achieving students, demonstrate proficiency on the state's academic standards. The improved achievement is to result from improving the entire educational program of the school. (34 C.F.R. § 200.25) Thus, a school operating a Title I schoolwide program is not required to identify: 1) students eligible for Title 1 funded services; or 2) individual services as supplementary. (34 C.F.R. § 200.25)

The Executive Director or designee shall inform the parents/guardians of Charter School's SWP eligibility and its ability to consolidate funds from federal, state, and local sources for program purposes.

#### A. Consolidation of Funds

The SWP may consolidate funds from Federal, State, and local sources to implement Charter School's comprehensive plan to upgrade its entire educational program. (20 U.S.C. § 6314(a); 34 C.F.R. § 200.25(e); 34 C.F.R. § 200.29(a))

A SWP school that consolidates and uses funds from any other Federal program is not required to meet the statutory or regulatory requirements of that program applicable at the school level but must meet the intent and purposes of that program to ensure that the needs of the intended beneficiaries of that program are addressed. (34 C.F.R. § 200.2(b)(1))

If Charter School chooses to consolidate funds from other Federal programs, it:

- 1) Will meet the requirements of those programs relating to health; safety; civil rights; student and parental participation and involvement; services to private school children; maintenance of effort; comparability of services; use of Federal funds to supplement, not supplant non-Federal funds; and distribution of funds to state educational agencies or LEAs. (34 C.F.R. § 200.2(b)(2)); and
- 2) Will not be required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those particular funds; but must maintain records that demonstrate that the SWP, as a whole, addresses the intent and purposes of each of the Federal programs whose funds were consolidated to support the SWP. (20 U.S.C. § 6314(a)(3)(C); 34 C.F.R. § 200.29(d))

If Charter School consolidates and uses funds from migrant education, Indian education, and special education in its SWP, Charter School shall meet specific requirements of such programs. (34 C.F.R. § 200.29(c))

## B. SWP Comprehensive Plan

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If Charter School operates a SWP, it shall develop a comprehensive plan with the involvement of parents/guardians and other members of the community to be served and individuals who will carry out such plan, including teachers, principals, other school leaders, paraprofessionals, administrators, to the extent feasible, tribes and tribal organizations present in the community, and, if appropriate, specialized instructional support personnel, technical assistance providers, school staff, Charter School's secondary school students, and other individuals determined by Charter School. (20 U.S.C. § 6314(b)(2))

The SWP plan shall be based on a comprehensive needs assessment of the entire school that takes into account information on the academic achievement of children in relation to the challenging state academic standards, particularly the needs of those children who are failing, or are at-risk of failing, to meet the challenging state academic standards and any other factors as determined by Charter School. (20 U.S.C. § 6314(b)(6))

The SWP shall be incorporated into a single plan for student achievement which also incorporates the plans required for other categorical programs included in the state's consolidated application. (Education Code § 64001; 20 U.S.C. § 6314(b))

The SWP plan shall include a description of any applicable federal, state, and local programs that will be consolidated in the SWP and the strategies that Charter School will implement to address school needs, including a description of how such strategies will: (20 U.S.C. § 6314)

- 1. Provide opportunities for all students, including economically disadvantaged students, ethnic subgroups, students with disabilities, and English learners, to meet the challenging state academic standards;
- 2. Use methods and instructional strategies that strengthen Charter School's academic program, 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; and
- 3. Address the needs of all Charter School students, but particularly the needs of those at risk of not meeting the challenging state academic standards, through activities which may include:
  - a. Counseling, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students' skills outside the academic subject areas;
  - b. Preparation for and awareness of opportunities for postsecondary education and the workforce, which may include career and technical education programs and broadening secondary school students' access to coursework to earn postsecondary credit while still in high school;
  - c. Implementation of a schoolwide tiered model to prevent and address problem behavior, and early intervening services, coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act;
  - d. Professional development and other activities for teachers, paraprofessionals, and other school personnel to improve instruction and use of data from academic assessments and to recruit and retain effective teachers, particularly in high-need subjects; and
  - e. Strategies for assisting preschool children in the transition from early childhood education programs to local elementary school programs

The SWP plan shall remain in effect for the duration of Charter School's participation, except that the SWP plan and its implementation shall be regularly monitored and revised as necessary based on student needs to ensure that all students are provided opportunities to meet the challenging state

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academic standards. The SWP plan shall be available to parents/guardians, and the public, and the information contained in the plan shall be in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand. (20 U.S.C. § 6314(b))

# **Comparability of Services**

As Charter School is a single school LEA, the comparability of services requirement does not apply. (20 U.S.C. § 6321(c)(4).)

## **Program Evaluation**

Charter School's Governing Board shall regularly monitor and evaluate its Title I program and the progress of its economically disadvantaged and low-achieving students. Charter School shall revise its Title I plan and strategies as necessary based on student needs to ensure that all students are provided opportunities to meet the challenging state academic standards.