

Frequently Asked Questions School-Wide Pool

1. What is school-wide consolidation?

School-wide consolidation allows a school to consolidate its funds into a single “pool” of funds. In other words, the funds from the contributing programs in the school lose their individual identity, and the school has one flexible pool of funds to address student needs.

2. What is the main purpose of consolidating Federal, State, and local funds in a school-wide program?

The main purpose of consolidating funds is to help schools effectively design and implement a comprehensive plan to upgrade the school's entire educational program based on the school's needs identified through its comprehensive needs assessment.

3. What are the benefits of consolidating Federal, State, and local funds in a school-wide program?

By consolidating funds from Federal, State, and local sources, a school can address its needs using all of the fiscal resources available to it. This provides the school leaders with more flexibility in how it uses available resources to meet the specifically identified needs of its students.

4. Which federal education program funds may be consolidated in a school-wide program?

Grant Funds	Yes	No	Notes
Title I, Part A	✓		
Title I, Part C	✓		<i>See question 6</i>
Title II, Part A	✓		
Title III, Part A	✓		
Title IV, Part A	✓		
Title IV, Part B	✓		
Perkins	✓		
IDEA	✓		<i>See question 7</i>
State	✓		
School Lunch		✓	
Head Start		✓	

Note: The authority to consolidate funding extends only to funds administered by the U.S. Department of Education (ED).

5. What are the different consolidation options for schools?

Option #1: Consolidation of Federal Funds: Schools may consolidate only federal funds into a school-wide consolidated pool. Funds must be treated as federal funds, but the school does not need to track an expenditure back to the specific federal program that contributed the funds. From an accounting perspective, the funds from the contributing federal programs lose their individual program identity when they become part of a consolidated school-wide pool and are accounted for as part of that pool rather than by the individual programs.

When federal funds are consolidated, the school-wide program school does not need to meet most of the federal programs' statutory and regulatory requirements of the consolidated federal program as long as it meets, and is able to demonstrate that it meets, the intents and purposes of those programs.

Option #2: Consolidation Federal, State and Local Funds: Consolidation of federal, state, and local funds provide the greatest extent of flexibility for schools. When federal, state, and local funds are combined in a school-wide consolidation program, the federal funds that have been consolidated lose their identity as federal funds. Under this option funds are considered "mixed together" and therefore, there is no way to identify a federal dollar from a state or local dollar. This means that the school-wide program is not required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those particular funds.

The main constraints under this option are that the school-wide program must meet the criteria for such programs established by Title I and the use of funds must be laid out in the school-wide plan.

6. *Are there any special restrictions on the consolidation of funds received under the Migrant Education Program (MEP)?*

Yes, prior to combining MEP funds, the school must consult with parents of migratory children or organizations representing those parents, or both, and meet the identified needs of migratory children that result from the effects of their migratory lifestyle or that are needed to permit migratory children to participate effectively in school. The school must also document that services to address those needs have been provided.

7. *May a school-wide pool consolidate funds received under the Individual with Disabilities Education Act (IDEA)?*

Yes. Funds under IDEA, Part B may be consolidated in a school-wide program, but all the programmatic protections accorded students with disabilities must be maintained, including , the guarantee of a free, appropriate public education (FAPE) and the preparation of an individualized education plan (IEP). In other words, IDEA services must be provided, but it is not necessary to track a given "IDEA dollar" to an identified "IDEA service".

8. *Can consolidated funds be used for basic operational expenses, such as building maintenance and repairs, landscaping, and custodial services?*

Depends, on the extent of consolidation, if a school-wide program consolidates only federal funds, the consolidated funds must be used to address the educational needs of a school identified by the needs assessment and articulated in the comprehensive school-wide plan. These funds must align to the uses of funds from the federal grants consolidated. From example, the majority of funds from Every Student Succeeds Act (ESSA) cannot be used for non-educational activities such as building maintenance and repairs, landscaping, and custodial services.

Contrast this with a school-wide program that consolidates federal, state, and local funds into one pool. Because federal funds lose their federal identity in this scenario, it is impossible to attribute specific activities to the consolidated federal funds. Therefore, when a school-wide program consolidates federal, state, and local into one pool, the consolidated funds may be used to pay for basic operational expenses.

9. *Can consolidated funds be used for summer programs?*

Yes. Federal, state, and local funds consolidated within a single pool can be used for summer programs as long as the use of funds is in accordance with state and local rules and aligns with the school's comprehensive school-wide plan.

10. *What are the record-keeping requirements under a school-wide program with consolidated funds?*

A school-wide program that consolidates federal funds with state and local funds is not required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those program funds. However, the school and LEA must maintain records that demonstrate the school-wide program, considered as a whole, addresses the intent and purposes of each consolidated federal education program.

11. *What are the time and effort requirements under a consolidated school-wide program?*

If the school consolidates federal, state, and local funding, there is no difference between staff paid with federal funds and staff paid with state or local funds. Thus, employees paid with consolidated funds are not required to file a semi-annual certification or any form of time and effort records.

If the school consolidates its federal funds separately from non-federal funds, then the federal dollars retain their federal identity and time-distribution records are required. Consistent with EDGAR, if the employee works on a single cost objective, the employee must keep a semi-annual certification; if the employee works on multiple cost objectives, the employee must maintain a monthly personnel activity report (PAR).