

Needs Assessment

(EXCERPT from Non-Regulatory Guidance)

How does the LEA apply for funds from the SEA, and what should be included in this application?

An LEA may receive a *Title II, Part A* subgrant by submitting to the SEA either a consolidated application or a program-specific application. The SEA determines the content of a consolidated local application and the procedure for submitting it [Section 9305]. A program-specific application must be based on a needs assessment and contain the appropriate descriptions and assurances [Sections 2122 (b) and (c)]. Whichever application an LEA submits, it must meet, and keep records to confirm that it has met, all statutory and regulatory requirements for *Title II, Part A*. Hence, the LEA should have records that describe:

1. Results of the local needs assessment;
2. The activities that the LEA will carry out with program funds, including the professional development provided to teachers and principals and how these activities will align with challenging State academic content standards, student academic achievement standards, State assessments, and the curricula and programs tied to those standards;
3. How the proposed activities are based on a review of scientifically based research and how the activities will have a substantial, measurable, and positive impact on student academic achievement, and how the activities will be used as part of a broader strategy to eliminate the achievement gap that separates the performance of low-income and minority students from other students;
4. How the LEA will coordinate professional development activities authorized under *Title II, Part A* with professional development activities provided through other Federal, State, and local programs;
5. How the LEA will ensure that the professional development needs of teachers (including teacher mentoring) and principals will be met with the LEA's *Title II, Part A* funds;
6. How the LEA will integrate *Title II, Part A* funds with funds the LEA receives through the Enhancing Education Through Technology program (*Title II, Part D*) to train teachers to integrate technology into curricula and instruction to improve teaching, learning, and technology literacy;
7. How the LEA's teachers, paraprofessionals, principals, other relevant school personnel, and parents have collaborated in preparing the local plan and will collaborate in the activities to be undertaken;
8. How the LEA will provide training to enable teachers to (1) teach to the needs of students with different learning styles - particularly students with disabilities, students with special

learning needs (including those who are gifted and talented), and those with limited English proficiency; (2) improve student behavior in the classroom; (3) involve parents in their child's education; and (4) understand and use data and assessments to improve classroom practice and student learning; and

9. How the LEA will use *Title II, Part A* funds to meet the requirements of *Title I*, Section 1119 of ESEA for teachers and paraprofessionals. That section requires an SEA to establish annual measurable objectives for each LEA and school that ensure that all teachers of core academic subjects are highly qualified. It also includes a requirement for the LEA's plan to include an annual increase in the percentage of teachers who receive high-quality professional development [Section 2122].

An LEA must also maintain records that, consistent with the assurances that were submitted in its *Title II, Part A* program applications, describe how it will: (1) target program funds to schools that have the lowest proportion of highly qualified teachers, have the largest average class size, or are identified for school improvement under *Title I*, Section 1116(b); and (2) comply with *Title IX*, Section 9501 of ESEA regarding participation of private school teachers.

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D-11. What is the purpose of the LEA needs assessment and how does the LEA use it?

The purpose of the needs assessment is to determine the needs of the LEA's teaching force in order to be able to have all students meet challenging State content and academic achievement standards. An LEA may want to use information such as student achievement data, information about numbers of teachers (disaggregated by subject taught and grade level) who lack full teacher certification or licensure, assessments by administrators and mentor teachers who evaluate teacher and student performance, and teacher self-evaluations.

The LEA uses the needs assessment to identify local teacher quality needs. Among other things, the assessment should identify those needs that must be addressed if the LEA does not have all teachers highly qualified. The assessment should take into account:

1. The activities that the LEA must conduct in order to give teachers the means to provide all students with the opportunity to meet challenging State content and academic achievement standards; and
2. The activities that the LEA needs to conduct in order to give principals the instructional leadership skills to help teachers provide all students with the opportunity to meet challenging State content and academic achievement standards [Section 2122(c)(2)].

A needs assessment also identifies those areas that an LEA should strengthen, such as areas of weakness in student academic achievement, as part of a meaningful plan for professional development and hiring. The LEA uses the results of this assessment to plan its *Title II, Part A* activities, keeping in mind its student achievement goals and its plan for ensuring that all teachers in core academic areas meet the "highly qualified" requirements.

D-12. Who must be involved in the needs assessment process?

The LEA must carry out the needs assessment with the involvement of the district's teachers, including those in schools receiving assistance under the *Title I, Part A* program.

D-13. What data should the LEA use when conducting a needs assessment?

The law provides that the LEA’s needs assessment “shall take into account the activities that need to be conducted in order to give teachers the means, including subject-matter knowledge and teaching skills, and to give principals the instructional leadership skills to help teachers to provide students with the opportunity to meet challenging State and local student academic achievement standards” [Section 2122(c)(2)]. However, the law does not prescribe the data an LEA must use in conducting its needs assessment.

The data necessary for determining teacher needs might include information such as: student achievement data, information on national and State initiatives, projections of the professional development necessary to ensure that all teachers of core academic subjects meet the highly qualified requirements in Section 9101(23), scientifically based research on proposed programs and strategies, projections of teacher supply in critical areas, student enrollment data, program assessment data, and community and business input.

D-14. After conducting its needs assessment, must the LEA target its use of *Title II, Part A* funds?

Yes. The LEA must target funds to schools that (1) have the lowest proportion of highly qualified teachers, (2) have the largest average class size, or (3) are identified for school improvement under Section 1116(b) of *Title I, Part A* [Section 2122 (b)(3)].

In addition, in considering its best use of *Title II, Part A* funds, an LEA should consider whether to target *Title II, Part A* funds to help it meet its responsibilities under *Title I*. These include providing assurances that the LEA will: (1) work in consultation with schools as the schools develop and implement their plans or activities under Section 1119 [Section 1112(c)(1)(H)]; (2) comply with the requirements of Section 1119 regarding the qualifications of teachers and paraprofessionals and professional development [Section 1112(c)(1)(I)]; and (3) ensure, through incentives for voluntary transfers, professional development, recruitment programs, or other effective strategies, that low-income students and minority students are not taught at higher rates than other students by unqualified, out-of-field, or inexperienced teachers [Section 1112(c)(1)(L)].

D-15. If a need is mentioned in the LEA needs assessment, must it be addressed in the district plan?

No. The LEA’s needs assessment focuses on “local needs for professional development and hiring as identified by the LEA and school staff.” The local assessment is likely to reflect a wide array of needs, not all of which the LEA may be able to address with limited fiscal and non-fiscal resources. Rather than try to address all of these identified needs, consistent with the content requirements for local applications in Section 2122(b), the district must plan its uses of *Title II, Part A* funds in those ways most likely to produce positive results in teaching practice and the achievement of all of the district’s students.

D-16. Must staff at individual schools be involved in developing an LEA’s needs assessment?

Yes. The law states that the needs assessment must reflect the needs for professional development “as identified by the [LEA] and school staff,” and requires the LEA to conduct its needs assessment “with the involvement of teachers, including teachers participating in programs under part A of Title I” [Section 2122(c)(1) and (2)]. Therefore, the LEA needs to involve teachers at individual schools in the needs assessment process. How it does so (e.g., through surveys, focus groups, and other means of collecting data) is left to the LEA and its staff to decide.

D-17. Should an LEA needs assessment examine strategies for eliminating the achievement gap that separates low-income and minority students from other students?

Yes. Since the law requires each LEA to develop a strategy for closing this achievement gap [Section 2122(b)(2)], the LEA presumably will want to use the needs assessment process to engage teachers, principals, and other staff in identifying key professional development and hiring needs in this critical area.

D-18. How can the SEA ensure that those activities an LEA proposes to implement with *Title II, Part A* funds are, in fact, consistent with the required local needs assessment?

If an LEA submits a program-specific application under Section 2122, the alignment of the proposed activities with the needs identified in the needs assessment should be evident from the content of the application itself. An LEA's program-specific application must contain a description of the results of its needs assessment [Section 2122(b)(8) and (c)]. The remainder of the application contains information on how the LEA's use of *Title II, Part A* funds will meet its identified needs. For example, the application must include a description of the professional development activities to be carried out with *Title II, Part A* funds, how these activities will have a substantial, measurable, and positive impact on student academic achievement, and how the activities will be used as part of a broader strategy to eliminate the achievement gap that separates low-income and minority students from other students [Section 2122((b)(2)].

If, instead, an LEA receives funding on the basis of a consolidated local plan or application, the SEA has flexibility, in consultation with the LEAs and the State’s governor, to adopt any application content requirements it wants provided these criteria relate to the objectives of the consolidated plan or application. For example, requirements may include improvement of teaching and learning through greater coordination of the Federal programs and their integration into State and local-funded activities. Hence, the SEA is free to tailor the application in any reasonable way to ensure that Federal funds are supporting teacher-training activities that flow from the local needs assessment. In addition, SEAs are strongly encouraged to implement

monitoring procedures to ensure that district *Title II, Part A* funds are being used consistent with the findings of the local needs assessment.