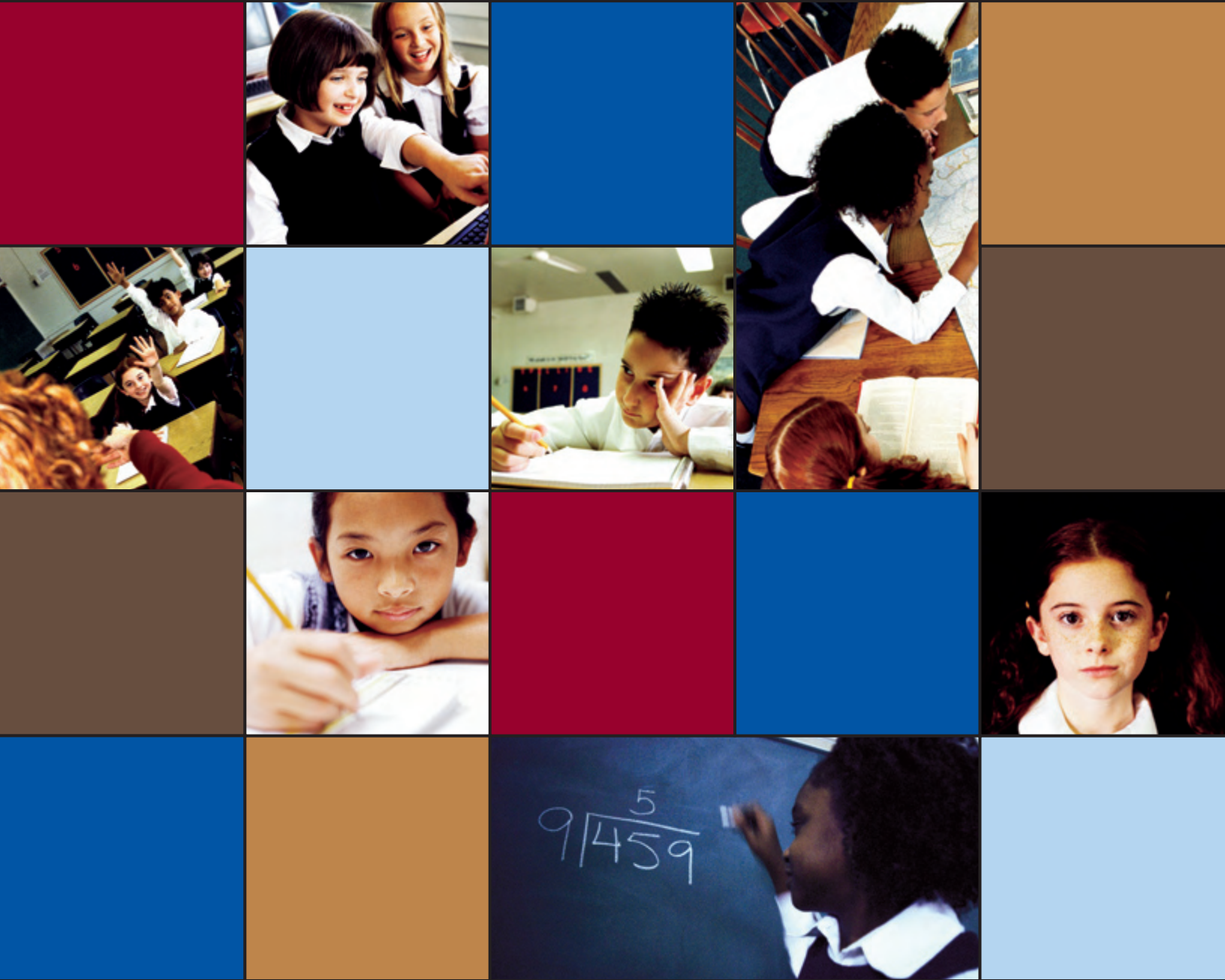


Ensuring Equitable Services to Private School Children

A Title I Resource Tool Kit



U.S. Department of Education

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U.S. Department of Education
Office of Elementary and Secondary Education
Student Achievement and School Accountability Programs

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September 2006

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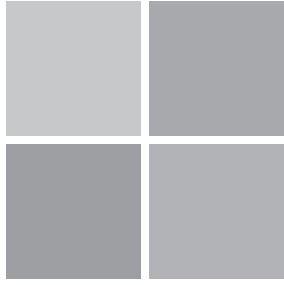
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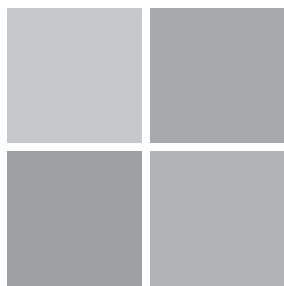
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Overview of the Tool Kit

Under Title I of the *Elementary and Secondary Education Act* (ESEA), as amended by the *No Child Left Behind Act* (NCLB) (see Appendix A), local educational agencies (LEAs) are required to provide services for eligible private school students, as well as eligible public school students. In particular, Sec. 1120 of Title I, Part A, requires a participating LEA to provide eligible children attending private elementary and secondary schools, their teachers, and their families with Title I services or other benefits that are equitable to those provided to eligible public school children, their teachers, and their families.

The Title I program provides supplemental educational services so that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Generally, to qualify for assistance under Title I, a student must reside within the attendance area of a participating public school located in a low-income area and be failing, or at risk of failing, to meet student academic achievement standards.

Secs. 200.62–200.67 of the Title I regulations (see Appendix B) detail the requirements to ensure the equitable participation of private school children, teachers, and families.

Services are considered to be equitable when the LEA meets the expenditure requirements in Sec. 1120(a)(4) and provides a program that meets the education needs of Title I participants.

The Title I services for private school students must be developed in consultation with officials of the private schools. Consultation with officials from private schools is an essential requirement in the

implementation by an LEA of an effective Title I program for eligible private school children, their teachers, and their families.

The amount of Title I funds allocated to each participating public school attendance area is determined mainly on the basis of the total number of low-income students residing in each area. Once the participating public school attendance areas have been established, an LEA calculates the per-pupil allocation (PPA) for each participating public school attendance area. Then, based on the total number of children from low-income families residing in each attendance area attending either public or private schools, the LEA calculates the total amount of funds for each area. From this amount, the LEA designates an amount of funds (equal to the PPA multiplied by the number of low-income private school students in the area) to provide equitable services to eligible private school participants.

The Title I services provided by the LEA for private school participants are designed to meet their education needs and to supplement the educational services provided by the private school. These services may be provided by the LEA or by a contractor who is independent of the private school and any religious organization. Title I services or benefits must be secular, neutral, and nonideological.

The tool kit provides examples of the ways in which various LEAs and private school officials have addressed Title I requirements to serve eligible private school children. It is intended as a resource to supplement the nonregulatory guidance of *Title I Services to Eligible Private School Children*, which is available on the Department's Web site at

www.ed.gov/programs/titleiparta/psguidance.doc.
(see Appendix C for additional resources).

The tool kit is divided into five sections that align with the major divisions of this nonregulatory guidance. The tool kit sections are:

1. Consultation;
2. Equitable participation of private school students;
3. Equitable participation of private school teachers of Title I participants;
4. Equitable participation of private school families of Title I participants; and
5. Standards, assessments, and program modification.

Sample tools, including selected practices, are located after appropriate sections.

Each section of the tool kit includes key topics, each of which contains tools to assist LEAs in meeting the requirements of the law.

The tool kit should be used in conjunction with the statute, regulations, and this nonregulatory guidance listed above. Unless otherwise indicated, forms, letters, and other information provided in the tool kit are not official U.S. Department of Education documents and they are not endorsed by the Department. Instead, these are documents that LEA and private school officials have found helpful in carrying out Title I requirements and are willing to share with other practitioners. They may be useful to you as is or they may need to be adapted to meet your local circumstances.

The tool kit can be reviewed in its entirety or can be used to find specific models and examples in areas where an LEA has a particular need. The models, examples, and forms provided are in the public domain for use in any Title I program. When using the examples provided, the reader should carefully review the content for appropriateness at the local level and adapt to local circumstances.

Purpose of the Tool Kit

Do you recognize yourself in any of the following scenarios?

- ❖ As an LEA Title I coordinator, you would like to improve the parent involvement services for private school families, but are unsure of how to create meaningful involvement for them. You wish you had some models that you could adapt for your use.
 - ❖ As an SEA Title I coordinator, you find that your LEAs are often operating their programs for private school children in a myriad of ways. You could use a document that would help focus a discussion of models among your LEA coordinators and lead to uniformity and effectiveness for the private school Title I programs in your state.
 - ❖ As a private school official, you do not feel confident going into the Title I consultation process with LEA officials. You would like to see an overview of the Title I program for private school children and get a better understanding of the program requirements.
- The purpose of the tool kit is to provide practitioners with models and other examples of how to effectively ensure equitable services to private school children, their teachers, and their families under the Title I program. It is designed to support efforts at the local level and to help all parties enter into the consultation process with greater knowledge, practical understanding of the Title I program, and ideas for implementation. The knowledge gained from the tool kit should enhance collaboration between public and private officials, leading to better programs for eligible private school children. It also encourages public and private school officials to:
- ❖ Understand the requirements of the law regarding the equitable participation of private school children, their teachers, and their families;

- ❖ Become knowledgeable about practices that enhance collaboration and help support the process of consultation and provision of services;
- ❖ Work together as partners to ensure a fair, equitable, and significant opportunity for private school Title I children to reach high academic standards; and
- ❖ Share best practices and models among colleagues.



1 Consultation

The consultation process between public and private school officials regarding the Title I program services should result in a Title I program designed to meet the education needs of eligible private school children. Consultation must include meetings between LEA officials and appropriate private school officials and must occur before the LEA officials make any decision that affects the opportunity for private school children to participate. In addition, consultation must occur in a timely and meaningful manner during the design, development, and implementation of the program. Ultimately, the LEA officials make the final decisions regarding provision of services after consultation has occurred.

Consultation topics must include at a minimum:

- ❖ How the LEA will identify the needs of the eligible children. During the consultation process, the public and private school officials must discuss how the children's education needs are identified, and what multiple, educationally related, objective criteria will be used to determine the private school children who are failing, or most at risk of failing, to meet student academic achievement standards.
- ❖ What services the LEA will offer to eligible private school children. During the consultation process, the LEA must design and implement services offered by the LEA that address the needs of eligible private school children.
- ❖ How, where, and by whom the LEA will provide services. During consultation, the options available for service delivery, including how, where, and by whom, must be discussed.
- ❖ How the LEA will assess academically the services and how the LEA will use the results of the assessment to improve services. Prior to program implementation, it is important to determine how the program will be assessed and to establish benchmarks for determining the effectiveness of the program.
- ❖ The size and scope of the equitable services that the LEA will provide to the eligible private school children and the proportion of funds that is allocated for such services. The funds available for the instructional program to serve eligible private school children is part of the determination of the size and scope of the program being offered.
- ❖ The method or source of data that the LEA will use to determine the number of private school children from low-income families residing in participating public school attendance areas. Determining the poverty count is most effectively done cooperatively by public and private school officials. Private school officials should know how the poverty data are collected and the number of private school children from low-income families who reside in Title I public school attendance areas.
- ❖ How and when the LEA will make decisions about the delivery of services to eligible children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with a potential third-party provider. Programs for private school students should begin at the time the LEA begins the public school Title I program.

- ❖ How, if the LEA disagrees with the views of the private school official on the provision of services through a contract, LEA officials must provide in writing to the private school officials an analysis of the reasons why the LEA has chosen not to use a contractor. To ensure that the views of the private school officials regarding provision of services by a third-party provider are adequately considered, the LEA must provide a written explanation to the private school officials if the LEA declines the private school officials' request for a third-party provider.
- ❖ How the LEA will involve families in the Title I program. Families of participating private school children should be given a variety of opportunities for meaningful involvement in their children's Title I program. During the consultation process, the program for families of private school participants should be designed to help parents support Title I instruction.
- ❖ What professional development activities the LEA will offer to the private school teachers of Title I participants. A professional development program for private school teachers of Title I participants must be designed during the consultation process and the design should reflect the needs of private school participants.

Sec. 200.63 of the Title I regulations requires that each LEA must obtain a written affirmation signed by the official of each participating private school, or a representative of those schools, that the required consultation process has occurred. A signature on an affirmation form signifies that the private school official is satisfied that an equitable program has been designed to meet student needs and has a reasonable promise of being effectively implemented. The written affirmation form must be maintained in LEA records and be provided to the SEA. If private school officials do not provide the written affirmation within a reasonable period of time, the LEA must forward documentation to the SEA that the required consultation has occurred.

Title I private school participants are provided with services that meet their education needs. These needs are met through a variety of services delivery mechanisms, discussed during the consultation process, such as pull-out models during the regular school day, before or after school instruction, or summer school classes.

There are other stipulations that must be met as well. For example, the Title I program must be conducted in space used (at the time) exclusively for Title I instructional services and the control of Title I funds and title to materials, equipment, and property purchased with Title I funds must be with the LEA.

Also, the LEA may provide the services directly through a teacher that it employs, or may contract with a third-party provider for services to eligible private school students. The administrative costs of the third-party provider must be reserved from the LEA's total allocation as an administrative cost under Sec. 200.77(f) of the Title I regulations before determining per-pupil allocations. This ensures that the allocation for instruction for the private school students is equal to the allocation for instruction for the public school students.

If the private school official does not believe that the LEA engaged in timely and meaningful consultation, or that the LEA did not give due consideration to the views of the private school official, or disputes the low-income data on private school children, or for another reason does not believe that the private school children are receiving fair and equitable Title I services, the private school official may file a complaint with the SEA. The decision of the SEA may be appealed to the U.S. secretary of education.

If an LEA in a state is prohibited from providing equitable services to private school children, or if the secretary determines that an LEA has substantially failed or is unwilling to provide equitable services, the secretary waives the requirements for the LEA to provide Title I services to private school

children and arranges for the provision of services. This procedure is known as a bypass. In making the determination, the secretary must consider one or more factors, including quality, size, scope, and location of the program, and the opportunity of eligible children to participate.

Selected Practices and Tools

Some SEAs provide forms and guidance for their LEAs, which assist LEAs in administering and implementing programs for eligible private school children. It also assures uniformity in program administration throughout the state.

Some private school organizations provide explanations of the consultation process to their officials who work with LEAs. This makes the consultation process more productive and helps the program begin smoothly. Other private school officials identify a formal representative who consults with the LEA officials and has the written authority to act on the private school officials' behalf. Some tools exemplifying such practices follow.

■ Some Consultation Activities

Tool 1.1—Example of Public-Private School Title I Committee

To enhance the consultation process, some LEAs establish a Title I committee comprised of public and private school officials who meet regularly to discuss the Title I program for eligible private school students and foster positive working relationships.

Tool 1.2—Consultation Timeline Between LEA and Private School Officials

This sample timeline can be adapted locally and gives month-by-month examples of an LEA's timely consultation activities.

Tool 1.3—An SEA's Guidance to LEA Officials to Help Them With Consultation

This excerpt provides details on allowable expenditures for Title I programs, materials, and service providers as well as the location of services.

Tool 1.4—Letter From Selected Diocesan Official to LEA Appointing a Private School Representative

This letter identifies the individual who is authorized to act on behalf of a group of private schools concerning the Title I program to the LEA.

Tool 1.5—Checklist of Consultation Topics

Included in the Title I statute and regulations is a list of topics for consultation. This list should serve as a checklist of topics to discuss.

Some SEAs include a "List of Good Practices" in the LEAs' Title I application packages to remind them of their obligations to private school children, their teachers and their families.

Tool 1.6—A Log to Document Contacts With the Private School Officials During the School Year

Log entries will help ensure an accurate account of all conversations between relevant parties.

■ Title I Calendar

Developing a Title I calendar is a good way to ensure that the private school calendar (for example, testing dates) is integrated into the Title I program activities.

Tool 1.7—Sample Title I Calendar

This calendar is one that an LEA created with private school officials.

■ Invitation Letters and Intent to Participate Response Form

Annually, LEAs must contact officials of private schools with children who reside in the LEA regarding the Title I program. The first step in making consultation timely and meaningful is to send an informative invitation for the first consultation meeting. Some LEAs send letters inviting the private school officials to attend an initial consultation meeting regarding the Title I program and include with the invitation a response form. Private school officials indicate on the form whether their students will participate in the Title I program and include school contact information.

Tools 1.8A and 1.8B—Sample LEA Letters With Response Form to Private School Officials Within LEA Inviting Participation of Private School Students

Tools 1.9A and 1.9B—Sample LEA Letter With Response Form to Officials in Private Schools Located Outside the LEA's Boundaries That May Have Eligible Students Residing Within the LEA

Tools 1.10A and 1.10B—Sample LEA Letter With Response Form to Private School Official Confirming His or Her Intent to Participate in the Title I Program and Giving Details for the First Consultation Meeting

■ Meeting Agendas for the Consultation Process

Well-constructed meeting agendas provide road maps for well-run and focused consultation meetings. Both public and private school officials should have the opportunity to suggest agenda topics. To the extent possible, envisioning the consultation needs for the school year prior to the first consultation meeting will determine what subjects should be covered in order to effectively pace the consultation process. The agenda items and timing of the meetings should follow the decisions made and the timeline established respectively at the first consultation meeting.

Tool 1.11—Agendas for Consultation Meetings

■ Written Affirmation of Consultation

When Title I was reauthorized by the *No Child Left Behind Act*, a requirement was added for a sign-off by private school officials to signify that consultation was timely and meaningful, covered all appropriate topics, and resulted in program designs that have a reasonable expectation of success. This written affirmation is an important part of the consultation process. The content of the written affirmation should follow the consultation requirements listed in Sec. 200.63 of the Title I regulations.

Tool 1.12A—Written Affirmation of Consultation With Private School Officials

This written affirmation form contains all the consultation requirements listed in the Sec. 200.63 of Title I regulations.

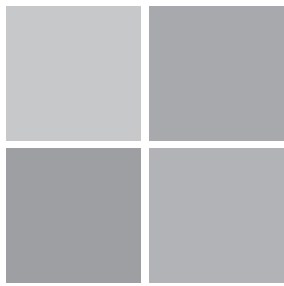
Tool 1.12B—Written Affirmation of Consultation With Private School Officials That Includes Student Selection Criteria

In addition to all the consultation requirements listed in the Title I regulations, these written affirmation forms contain student selection information.

■ Complaint Process

Improving the consultation process and opening the lines of communication should result in Title I programs that are designed to better meet the needs of the private school participants. Effective and ongoing consultation may deter formal complaints to the SEA by private school officials; however, private school officials have the right to complain to the SEA.

Tool 1.13—The Complaint Process



Tools

Tool 1.1—Example of Public-Private School Title I Committee

This is an example of the information that an LEA developed to strengthen the consultation process between public and private school officials.

Public-Private School Title I Committee

Overview

The public-private school Title I committee is made up of public and private school officials. Committee members focus on the goal of providing suggestions and insight regarding the needs of the private school participants so that the LEA can design the best possible Title I programs that meet the needs of the eligible private school children. Keeping this open channel of communication among private school officials, parents, Title I and private school teachers, and the public school officials is a key to program success.

The committee meets monthly throughout the school year to discuss the design, development, implementation, and assessment of the Title I programs for private school participants. Additional meetings are scheduled as needed.

Membership

Private school members include school administrators, teachers, and a parent representative. Public school members include the Title I official responsible for the program serving private school students and Title I instructional specialists. Other experts are invited on an *ad hoc* basis, as needed.

Objectives

Objectives of the committee are to:

- Develop a consultation timeline;
- Assist in the collection of data, as needed;
- Identify the private school children living in participating public school attendance areas who are failing or most at risk of failing;
- Discuss and provide suggestions so that Title I programs for identified children can be created that meet those children's needs;
- Discuss ways to provide private school teachers with intervention strategies and professional development in order to assist the Title I children;
- Discuss ways to encourage parents to support their children's Title I instruction; and
- Review assessment results as a catalyst for instruction change.

Tool 1.2–Consultation Timeline Between LEA and Private School Officials

**Example of a Timeline for LEA Consultation
With Private School Officials***

| Month | LEA Activity | Legal Basis** |
|---|--|--|
| <p>November/December in preparation for the next school year</p> | <p>Obtain complete list of all private schools with students who are residents of the LEA.</p> <p>Meet with private school officials to review timeline and consultation process. Establish a consultation calendar and procedures for collecting poverty data (i.e. data on low-income families).</p> | <p>LEA uses list to ask all private school officials if they want their eligible students to participate in Title I the next school year.</p> <p>See §1120(a) of the <i>Elementary and Secondary School Act</i>.</p> |
| <p>December through February in preparation for the next school year</p> | <p>Obtain from principals or a central office serving a group of private schools the following poverty data (as appropriate) on private school students:</p> <ul style="list-style-type: none"> • Same poverty measure used to count public school students, which is usually free and reduced-priced lunch; • Survey of private school parents asking for income data, address, and grade level of children from which the LEA must extrapolate these data (see Section 2); • Alternative poverty data such as scholarships, Temporary Aid to Needy Families, Medicaid, etc. <p>~or~</p> <ul style="list-style-type: none"> • Decide through consultation to use proportionality (see Section 2). | <p>Private school students from low-income families who live in Title I participating public school attendance areas generate funds for instructional services.</p> <p>See §1120(c)(1) & §200.78(a)(2) of the Title I regulations.</p> |
| <p>February/March in preparation for the next school year</p> | <p>Match addresses of private school students from low-income families to participating public school attendance areas.</p> <p>Estimate the amount of funds generated for instruction using the same estimated per-pupil amount as that used for public school students in participating public school attendance areas.</p> <p>Meet with private school officials to discuss poverty data collected, amount of estimated instructional funds generated, and determine if funds will be pooled, not pooled, or a combination of both options.</p> | <p>See §1120(b)(1)(f) & (2) and §200.64(a).</p> |

* In this example, multiple meetings will be required to cover each LEA activity.

** This column references Title I, Sec. 1120 and 34 *CFR* 200.

Tool 1.2–Consultation Timeline Between LEA and Private School Officials (continued)

Example of a Timeline for LEA Consultation With Private School Officials (Continued)

| Month | LEA Activity | Legal Basis |
|--|---|--|
| March/April in preparation for the next school year | <p>Determine the multiple, educationally related, objective criteria to be used to select eligible students (educationally needy students who reside in Title I attendance areas) in consultation with private school officials.</p> <p>Obtain from private school officials lists of names, addresses, and grades of private school students who meet the criteria.</p> <p>From these lists, select for Title I services those students most at-risk of failing, as decided in consultation.</p> <p>Discuss with private school officials the needs of selected students, appropriate Title I services to serve those needs, and location of services.</p> <p>Design services that meet participants' needs based on consultation, using the estimated amount of funds generated by private school students from low-income families, and the equitable share of funds reserved for districtwide instructional activities.</p> <p>Determine with private school officials the standards and annual assessments for measuring progress of the Title I program.</p> <p>Define annual progress. Determine criteria for making program modifications when annual progress is not achieved.</p> <p>Assess the achievement of current year's program using the standards previously agreed upon last year.</p> <p>After appropriate consultation, make modifications to next year's Title I program, if annual progress has not been met.</p> | <p>Multiple, educationally related, objective criteria required under §1115(b). See §200.62(b).</p> <p>See §1120(b).</p> <p>See §200.62(b)(2).</p> <p>See §1120(b)(1) and §200.63(a) and (b).</p> <p>See §200.64.</p> <p>LEA must assess quality and effectiveness of Title I program each year. LEA modifies the design of services if annual progress is not met.</p> <p>See §1120(b)(1)(D) and §200.63(b)(5).</p> |

Tool 1.2–Consultation Timeline Between LEA and Private School Officials (continued)

**Example of a Timeline for LEA Consultation
With Private School Officials (Continued)**

| Month | LEA Activity | Legal Basis |
|--|---|--|
| <p>April/June in preparation for the next school year</p> | <p>Determine in consultation with private school officials the professional development and parent involvement needs of private school teachers and families of private school participants.</p> <p>Design activities that LEA will implement the next school year (independently or in conjunction with LEA activities) for teachers and families of participants.</p> <p>Inform private school officials of tentative program designs, service delivery models, number of Title I participants, allocations, location of services, and estimated costs. Provide opportunities for private school officials to comment.</p> <p>Update private school officials if there are any changes. Generate a list of students who will receive Title I services beginning in September of the next school year.</p> <p>Obtain written affirmation from private school officials or their representatives that timely and meaningful consultation has occurred. Consultation must be ongoing, however, and should continue throughout the school year.</p> <p>Complete all necessary reports, contract negotiations, ordering of materials, hiring of teachers, etc. Consultation should be completed for the next school year prior to LEA submitting its Title I application to the SEA.</p> | <p>Equitable services for teachers and families of participants apply to funds reserved under §§1118 and 1119. See §1120(a) and §200.65.</p> <p>LEAs must provide opportunities for consultation with private school officials if program is modified or private school officials request more discussion. See §1120(b) and §200.63.</p> <p>See §1120(b)(4) and §200.63(e).</p> <p>These actions ensure that programs will begin at the start of the school year. See §1120(a)(3) and §200.62(a)(1).</p> |
| <p>August in preparation for the beginning of school year</p> | <p>Report on readiness of Title I program for private school participants to private school officials.</p> | <p>Private school officials should be aware how LEA will implement the program in September, including staffing, number of students to be served, location, etc. See §1120(b)(2) and §200.63(c).</p> |

Tool 1.2–Consultation Timeline Between LEA and Private School Officials (continued)

**Example of a Timeline for LEA Consultation
With Private School Officials (Continued)**

| Month | LEA Activity | Legal Basis |
|---------------------------------|---|------------------------------------|
| September of school year | LEA begins Title I services for students identified the previous spring as participants and provides private school officials with their names, services to be provided, and names of Title I teachers. | See §1120(a)(1) and §200.62(a)(1). |
| | Obtain a list of newly enrolled students who meet eligibility criteria. Consult with private school officials on how new students might be accommodated in the program. Initiate professional development and parent involvement activities based on previous spring’s consultation. | See §200.65. |
| October of school year | LEA provides information about possible adjustments and program changes to private school officials. Start planning for the next school year’s consultation cycle. | See §1120(b)(2) and §200.63(c). |

Key issues relating to the provision of Title I services are discussed during consultation, which provides an opportunity for the both the public and private school officials to express their views and to have those views considered. Ultimately, the LEA is responsible for planning, designing, and implementing the Title I program and may not delegate that responsibility to the private schools or their officials.

As a result, private school officials who want services for their eligible students should be aware of their roles in the consultation process to ensure that Title I programs designed by the LEA effectively meet the needs of their participating children, their teachers, and their families. Roles for the private school officials are:

- Participating in consultation;
- Providing lists of addresses and grades of low-income families;
- Providing lists of names, addresses, and grade levels of children who meet the multiple, educationally related, objective criteria for participation eligibility;
- Suggesting ideas, program designs, and modifications that meet the needs of their eligible children, their teachers, and their families; and
- Providing a dedicated space, if appropriate.

Tool 1.3—An SEA’s Guidance to LEA Officials to Help Them With Consultation

Services to Private School Children: Guidelines for Allowable Title I Expenditures

Timely and Meaningful Consultation

Sec. 1120(b) of the *No Child Left Behind Act* and Sec. 200.63 of the Title I regulations require that timely and meaningful consultation occur between the local educational agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, their teachers, and their families to participate in Title I programs, and shall continue throughout the implementation and assessment of activities.

Allowable Program Expenditures

Title I funds are expended to implement academic research-based programs that help students improve their academic achievement in the regular private school classrooms (i.e., reading, mathematics, etc). Title I program expenditures can include the following:

1. Books, materials, and equipment necessary to implement the Title I program (The LEA retains title to the books, other materials, and equipment purchased with Title I funds. Materials, etc. purchased with Title I funds may be used only by Title I participants. Each item purchased with Title I funds must be labeled “Property of _____ School District.” The labels should not be either easily erased or removable.);
2. Extended-day services;
3. Summer programs;
4. Saturday programs;
5. Counseling programs;
6. Computer-assisted instruction (CAI) with noninstructional computer technicians who supervise computer labs, maintain discipline, and escort students to and from class (Their salaries are an administrative cost under Sec 200.77(f) of the Title I regulations and may not be charged to funds generated by private school children from low-income families, which is for instruction.);
7. Home tutoring;
8. Computers and software products; and
9. Take-home computers (The LEA should ensure that families and students are properly trained in computer and software use.).

Tool 1.3—An SEA’s Guidance to LEA Officials to Help Them With Consultation (continued)**Services to Private School Children:
Guidelines for Allowable Title I Expenditures (continued)****Allowable Expenditures for Service Providers**

These expenditures include:

1. Salaries and fringe benefits for highly qualified teachers directly hired by the LEA;
2. Salaries and fringe benefits for qualified paraprofessionals directly hired by the LEA and supervised by highly qualified public school teachers who are located in the same building;
3. LEA contracts with third-party providers (The contract should provide information that ensures the LEA that the Title I program contract will be administered in accordance with all requirements. The LEA must exercise oversight of the instructional program and administrative costs); and
4. LEA contracts with retired public or private school teachers to teach at the private school during the school day and before or after school.

Location of Services and Equipment

1. Title I services must be provided in a separate space that is under the LEA’s control when Title I services are being provided;
2. If the services are provided in a library or private school classroom, the space must be separate and partitioned off; and
3. Computer equipment and other supplies purchased with Title I funds may be used only by Title I students in the Title I program.

Tool 1.4–Letter From Selected Diocesan Official to LEA Appointing a Private School Representative

In some LEAs, some private school officials have one representative with whom the LEA consults.

Letterhead

[Insert Date]

[Insert School Name]

[Insert School District]

[Insert School Address]

[Insert City, State, and Zip Code]

Dear _____:

For several years the Department of Catholic Schools has appointed one representative to serve as a liaison between the Catholic elementary schools in each public school district and staff members of the school district in matters pertaining to government programs. Since this practice has proved to be mutually beneficial, we will continue to appoint a representative.

Your district's representative for the upcoming school year is:

[Insert Name], Principal

[Insert Name of School]

[Insert Street Address]

[Insert City, State, and Zip Code]

[Insert Phone Number]

This representative is authorized to act on behalf of the Catholic elementary schools in your district in matters of planning and program operation with respect to all government programs to which private school students are entitled. Please feel free to contact me at any time at xxx- xxx-xxxx.

Please consider this letter as a formal notification that the schools of the Diocese of _____ wish to have their students participate in all programs under the *No Child Left Behind Act of 2001* that provide for the equitable participation of private school students, their teachers and other educational personnel, and their families.

Sincerely,

Diocesan Director of Federal and State Programs

cc: Regional Supervisor

Tool 1.5–Checklist of Consultation Topics

This list of consultation topics provides the LEA officials with the specific topics that must be covered in consultation meetings as required under Sec. 1120(b) of Title I and Sec. 200.63 of the Title I regulations. As LEA and private school officials address and complete discussions on each topic, the LEA officials may want to check-off each item as finished so to create a record for future reference should the need arise.

LEA Checklist of Consultation Topics

This list of consultation topics provides the LEA officials with the specific topics that must be covered in consultation meetings as required under Sec. 1120(b) of Title I and Sec. 200.63 of the Title I regulations. As LEA and private school officials address and complete discussions on each topic, the LEA officials may want to check-off each item as finished so to create a record for future reference should the need arise.

- How the LEA will identify the needs of eligible private school children;
- What services the LEA will offer to eligible private school children;
- How and when the LEA will make decisions about the delivery of services;
- How, where, and by whom the LEA will provide services to eligible private school children;
- How the LEA will assess academically the services to private school children in accordance with Sec. 200.10 of the Title I regulations and how the LEA will use the results of that assessment to improve Title I services;
- The size and scope of the equitable services that the LEA will provide to eligible private school children and, consistent with Sec. 200.64 of the Title I regulations, the proportion of its Title I funds that the LEA will allocate for these services;
- The method, or the sources of data, that the LEA will use under Sec. 200.78 of the Title I regulations to determine the number of private school children from low-income families residing in participating public school attendance areas, including extrapolation if a survey is used;
- The equitable services the LEA will provide to teachers and families of participating private school children;
- The service delivery mechanisms the LEA will use to provide services; and
- Consideration and analysis of the views of the private school officials on whether the LEA should contract with a third-party provider and provide in writing to those officials the reasons if the LEA decides not to use a third-party provider.

Tool 1.7—Sample of Title I First-quarter Calendar

The following is an example of a quarterly calendar that a selected LEA and private school officials have used to keep track of various activities at the private school.

Title I Calendar for First Quarter

The following is an example of a quarterly calendar that a selected LEA and private school officials have used to keep track of various activities at the private school.

August

- 11–14 Orientation for Title I teachers
- 18 LEA quarterly meeting with private school principals
 - Introduction of Title I teachers
- 22 Title I teachers assigned to space in private schools
- 25 Private school classes begin

September

- 8–12 Iowa Test of Basic Skills (ITBS) test administered to all private school children by private school officials
- 11 Title I teachers attend the parent-teacher organization meeting at private schools
- 12 Title I classes begin

October

- 2 Professional development activity for private school teachers of Title I participants: Adapting scientifically based reading research to Title I instruction

November

- 13 First-quarter report cards distributed to parents at parent-teacher conferences held at private school with Title I teachers participating in the conferences
- 14 ITBS testing data available for review by LEA and private school officials
- 20 LEA quarterly meeting with private school principals
 - Discuss whether new children should be added to Title I program based on the ITBS test data?
 - Begin planning for next year
- 29 Professional development activity: Using student assessment data to improve instruction for Title I students in your classroom.

Tool 1.8A—Sample LEA Letter to Private School Officials Within LEA Inviting Participation of Their Students

Begin consultation early enough to allow sufficient time to collect poverty data, determine student education needs from private school officials, and complete the school district's application to the state by the due date.

Letterhead

[Insert Name]
[Insert Address]
[Insert City, State, Zip Code]

[Insert Date]

Dear [Insert Name]:

Your students may be eligible for federal education services under Title I, Part A, of the *Elementary and Secondary Education Act*. Title I, Part A, provides services to both public and private school children who need additional educational help and who live in Title I public school attendance areas. Services can range from reading instruction several times per week during the regular school day to mathematics instruction after school to counseling services to a family literacy program during the summer. In addition to these student services, Title I can provide professional development activities for teachers of participating children and special activities for families of Title I students.

If you are interested in learning more about the Title I program that your eligible students and teachers could receive in the next school year, please return the enclosed form no later than [insert day at least 10 days after receipt of letter]. You may return the form by fax to [insert fax number]. Upon receipt of your form, you will be contacted about our first consultation meeting, which is planned for [insert date at least 10 days after form is due].

We hope that you will choose to learn about the Title I services for your students, teachers, and families. In the meantime, if you have any questions, please contact me at [insert phone number and e-mail address]. I look forward to meeting you soon.

Sincerely,

Title I Director

Enclosure

**Tool 1.8B—Response Form to Accompany Sample LEA Participation Letter to Private School Officials
(Tool 1.8A)**

**Private School Officials Interested in Their Students
Participating in the Title I Program**

Name of Private School _____

Name of Private School Official _____

Title of Private School Official _____

Private School Contact (if other than person listed above):

E-mail of Contact _____

Phone Number of Contact _____

Fax _____

_____ **Yes**, I am interested in my students, teachers, and families participating in Title I programs for the 20__–20__ school year.

_____ **No**, I am not interested in my students, teachers, and families participating in Title I programs for the 20__–20__ school year.

Please return this form by [insert due date] to:

[Insert name]

[Insert phone and fax numbers]

[Insert e-mail address]

Tool 1.9A–Sample LEA Letter to Officials of Private Schools Located Outside the LEA’s Boundaries That May Have Eligible Students Residing Within the LEA

Letterhead

[Insert Name]

[Insert Address]

[Insert City, State, Zip Code]

[Insert Date]

Dear [Insert Name]:

[Insert name of school district] is beginning to plan its Title I program for the next school year and needs *your* help to determine if there are any students who live in *our* school district and attending your school who may be eligible for Title I services. Title I, Part A, authorized under the *Elementary and Secondary Education Act*, provides services to children who need extra educational help and reside in Title I public school attendance areas. Services can range from reading instruction several times per week during the school day, to mathematics instruction after school, to counseling services, to a family literacy program during the summer. In addition to student services, Title I provides professional development activities for private school teachers of participating children and special activities for families of Title I students.

Under the Title I program, the number of private school students who qualify for free and reduced-price lunch (they do not need to be participants) and reside in a Title I public school attendance area provide the basis for calculating the amount of funds used to implement the program. Students who need extra educational help and reside in a Title I public school attendance area are *eligible for services*.

In order to determine the amount of funds available to support a Title I program that would serve children with education needs, please complete the enclosed form. If you have any questions or would like to discuss the Title I program, please call me at [insert phone number].

Sincerely,

Title I Director

Enclosure

Tool 1.9B—Response Form to Accompany LEA Letter to Officials of Private Schools Located Outside District Boundaries

**Officials of Private Schools Outside the LEA
Interested in Having Their Students Who Live in the LEA
Participate in the Title I Program**

Name of Private School _____

Name of Private School Official _____

Title of Private School Official _____

Private School Contact (if other than person listed above):

Phone Number of Contact _____

E-mail address _____

Fax _____

Please check which applies:

_____ **Yes**, I am interested and have data on my students' qualification for free and reduced-price lunch.

_____ **Yes**, I am interested, but I do not have data my students' qualification for free and reduced-price lunch.

_____ **No**, I am not interested.

If you have data on your students' qualifications for free and reduced-price lunch, please provide [insert name of school district] with the address and grade level of all students residing in [insert name of school district] and who meet the qualifications. Do NOT provide student names.

Please return this form by [insert due date] to:

[Insert name]

[Insert phone and fax numbers]

[Insert e-mail address]

Tool 1.10A–Sample LEA Letter to Private School Official Inviting Their Students to Participate in Title I Programs and Giving Details on Consultation Meeting

Begin consultation early enough to allow sufficient time to collect poverty data, determine student education needs from private school officials, and complete our application to the state by the due date.

Letterhead

[Insert Name]
[Insert Address]
[Insert City, State, Zip Code}

[Insert Date]

Dear [Insert Name]:

Your students may be eligible for federal education services under Title I, Part A, of the *Elementary and Secondary Education Act*. Title I, Part A, program provides services to both public and private school children who need additional educational help and who live in Title I public school attendance areas. Services can range from reading instruction several times per week during the regular school day to mathematics instruction after school to counseling services to a family literacy program during the summer. In addition to these student services, Title I may provide professional development activities for teachers of participating children and special activities for families of Title I students.

If you are interested in learning more about the Title I program that your eligible students and teachers could receive in the next school year, please return the enclosed form no later than [insert day at least 10 days after receipt of letter]. You may return the form either by fax to [insert fax number] or by U.S. mail. When I receive your form, I will contact you about our first consultation meeting, which is planned for [insert date at least 10 days after form is due].

We hope that you will come and learn about the Title I services available for your students, teachers, and families. In the meantime, if you have any questions, please contact me at [insert phone number and e-mail address]. I look forward to meeting you soon.

Sincerely,

Title I Director

Enclosure

**Tool 1.10B—Response Form to Accompany Sample LEA Participation Letter to Private School Officials
(Tool 1.10A)**

Private School Officials Interested in Their Students Participating in the Title I Program

Name of Private School _____

Name of Private School Official _____

Title of Private School Official _____

Private School Contact (if other than person listed above):

Phone Number of Contact _____

E-mail address _____

Fax _____

_____ **Yes**, I am interested in my students, teachers, and families participating in Title I programs for the 20__–20__ school year.

_____ **No**, I am not interested in my students, teachers, and families participating in Title I programs for the 20__–20__ school year.

Please return this form by [insert due date] to:

[Insert name]

[Insert phone and fax numbers]

[Insert e-mail address]

Tool 1.11—Agendas for Consultation Meetings

Sample Agendas for Consultation Meetings Throughout the School Year

Agenda for early winter meetings (typically in December or January) in preparation for the next school year

1. Welcome and introduction.
2. Overview of Title I program.
3. Options for service providers: the LEA or a third-party.
4. Discussion on the collection of poverty data: What is available from private schools? Is the survey with extrapolation a possibility? Should the LEA consider proportionality?
5. Discussion on possible program designs: Should it be a pullout program or a before or after school program? Which grade levels and what academic subjects should the Title I program encompass? Do the private school officials have space in their schools for the LEA to provide Title I services?

Agenda for late winter or early spring meetings (typically in February or March)

1. Review of poverty data collected and the estimated amount of funds available for services. Decide if pooling option will be used.
2. Determination of the multiple, educationally related and objective criteria used to select eligible children who reside in Title I public school attendance areas.
3. Review of options for service providers.
4. Plan a program design workshop for private school principals and LEA instructional specialists.
5. Discuss how the Title I program will be evaluated: What standards and assessment will be used? What will be annual progress and what percentage of participants must meet that progress in order for the program to be effective.
6. Establish the date that Title I services will start.
7. Discuss the professional development needs of the private school teachers of Title I participants based on the most recent student assessment data
8. Discuss the needs of the parents of participants: How can parents better support their children's instruction?

Agenda for late spring meetings (typically in April or May)

1. Finalize the designs of the Title I programs—ensure materials have been ordered, LEA personnel who are providing Title I services are in place, and service start date is firm.
2. Finalize professional development programs and activities for private school teachers. Establish a calendar for the next year's activities.
3. Finalize parent involvement programs and activities for parents of participants. Establish a calendar for next year.
4. Review current year's assessment data for current year participants to determine if any adjustments to instruction should be made.
5. Provide affirmation forms for signature.

Tool 1.11—Agendas for Consultation Meetings (continued)**Sample Agendas for Consultation Meetings
Throughout the School Year (continued)****Agenda for meeting one month after program has begun (typically in the month of October)**

1. Review the implementation of the program for the first month.
2. Discuss changes in roster of eligible children and the possibility of adding children to the program, as needed, depending on space and time.
3. Review process for coordinating Title I program with classroom teachers.
4. Review implementation of the professional development program.
5. Review implementation of the parental involvement program.

Tool 1.12A–Written Affirmation of Consultation With Private School Officials

LEA Affirmation of Consultation With Private School Officials

Sec. 1120(b) of the *Elementary and Secondary Education Act* and Sec. 200.63 of the Title I regulations require that timely and meaningful consultation occur between the local education agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in programs under this act. Consultation shall continue throughout the implementation and assessment of activities under this section.

The following topics *must* be discussed during the ongoing consultation process:

- How the LEA will identify the needs of eligible private school children;
- What services the LEA will offer to eligible private school children;
- How and when the LEA will make decisions about the delivery of services;
- How, where and by whom the LEA will provide services to eligible private school children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with a third-party provider;
- How the LEA will assess academically the services to eligible private school children in accordance with Sec. 200.10 of the Title I regulations and how the LEA will use the results of that assessment to improve Title I instructional services;
- The size and scope of the equitable services that the LEA will provide to eligible private school children and, consistent with §200.64, the proportion of funds that will be allocated to provide these services;
- The method or sources of data that the LEA will use under §200.78 to determine the number of private school children from low-income families residing in participating public school attendance areas, including whether the LEA will extrapolate data, if a survey is used;
- The equitable services the LEA will provide to teachers and families of participating private school children; and
- If the LEA disagrees with the views of the private school officials on the provisions of services through a contract, the LEA must provide the private schools the reasons in writing why the LEA chooses not to use a contractor.

We agree that timely and meaningful consultation occurred before the LEA made any decision that affected the participation of eligible private school children in the Title I, Part A, program.

| | | | |
|------------------------|---|-------------------------------|------|
| Public School Official | Date | Private School Representative | Date |
| School District | Name of Private School Agency or School | | |

The LEA must maintain a copy of this form in its records and provide copies to the SEA.

Tool 1.12B–Written Affirmation of Consultation With Private School Officials That Includes Student Selection Criteria

LEA Affirmation of Consultation With Private School Officials That Includes Student Selection Criteria

Name of LEA _____

Name of Private School _____

To ensure timely and meaningful consultation during the design and development of the LEA’s programs under Title I, Part A, the LEA has consulted with private school officials on the following issues:

- Data sources to be used to identify children’s needs;
- Services to be offered;
- How, where, and by whom the services will be provided;
- How the services will be academically assessed and how the results of that assessment will be used to improve services;
- The size and scope of the equitable services to be provided to the eligible private school children, and the proportion of funds that is allocated for such services;
- The method or sources of data used to determine the number of children from low-income families in participating school attendance areas who attend private schools;
- The delivery of services to private school children;
- The needs of private school teachers who teach Title I students and the professional development program that will be designed to meet their needs;
- The needs of families of Title I children and the family involvement program that will be designed to meet their needs; and
- Disagreements regarding contract.

Consultation included meetings with private school officials before the LEA made any decision that affected the opportunities of eligible school children to participate in Title I, Part A, programs. Such meetings will continue throughout the implementation of the program and will include assessment of services provided.

The following multiple, educationally related, objective criteria are used to determine private school student eligibility for the Title I, Part A, program:

| Grade level | Criteria | Method to determine greatest need |
|-------------|----------|-----------------------------------|
| | | |
| | | |
| | | |
| | | |

I affirm that the required consultation has occurred.

| | | |
|--------------------------------------|---------------------------------|------|
| Signature of private school official | Name of private school official | Date |
| Signature of public school official | Name of public school official | Date |

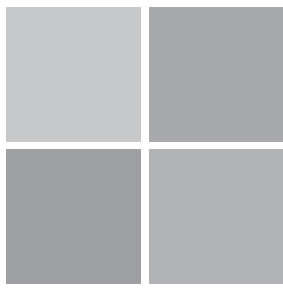
Tool 1.13-The Complaint Process

The Complaint Process for Private School Officials

Under Title I, a local education agency (LEA) is required to provide to eligible private school children, their teachers, and their families Title I services or other benefits that are equitable to those provided to eligible public school children, their teachers, and their families. Private school officials have recourse through the complaint process if they do not believe their eligible children, teachers, or families are receiving equitable services.

Aspects of the complaint process that the private school officials should know:

- A private school official has a right to complain to the state educational agency (SEA) that the LEA did not engage in a timely and meaningful consultation process or did not give due consideration to the views of the private school officials.
- Any dispute regarding the accuracy of low-income data for private school students also can be the subject of a complaint.
- The SEA is required to have complaint procedures in place as required by Sec. 34 *CFR* 299.10–12. Included in these procedures is a reasonable time by which the SEA must respond in writing to the complaint.
- No later than 30 days following the written response by the SEA, or in the event the SEA fails to resolve the complaint within a reasonable period of time, the private school official may appeal the decision of the SEA to the secretary of the U.S. Department of Education. Such appeal must be accompanied by a copy of the SEA’s written response, if available, and a complete statement of the reasons supporting the appeal.
- The secretary must complete an investigation of the complaint and resolve the appeal within 120 days after receipt of the appeal.



Equitable Participation of Private School Students

Under Sec. 1120 of Title I, an LEA is required to provide eligible children attending private elementary and secondary schools Title I services or other benefits that are equitable to those provided by the LEA to eligible public school children. Sec. 1120(a)(4) requires that Title I expenditures for educational services and other benefits to eligible private school students be equal to the proportion of funds allocated to participating public school attendance areas based on the number of private school children from low-income families, which the LEA may determine each year or every two years. Thus, the amount of Title I funds available for serving private school children who are failing or at risk of failing and who reside in a participating public school attendance area is determined on the basis of the number of the private school children from low-income families who reside in participating public school attendance areas. After consultation with private school officials, LEA officials may select one or more of the following ways to calculate the number of private school children from low income families:

- ❖ Use the same measure of low income used to count public school children, which is usually the free and reduced-price lunch count; or
- ❖ Use the results of a survey that, to the extent possible, protects the identities of families of private school students. (Such survey results are extrapolated if complete actual data are unavailable.); or
- ❖ Apply the low-income percentage of each participating public school attendance area to the number of private school children who reside in that attendance area (i.e., proportionality); or
- ❖ Use an equated measure of low income to compare the count of low-income public school children with the low-income private school population.

According to Title I, each student from a low-income family who resides in a participating public school attendance area is assigned a per-pupil amount of Title I funds. This amount is the same for public and private school students residing in the same public school attendance area. Some public school attendance areas with high concentrations of low-income families may have a higher per-pupil amount than a public school attendance area with less poverty. In the case of an area with a higher concentration of low-income families, often called a “tier” or a “band,” both public and private school students from low-income families who reside in the same public school attendance area are assigned the higher per-pupil amount. Averaging the per-pupil amount for public school students to derive a per-pupil amount for private school students is not allowed.

Funds generated by private school children from low-income families who reside in participating public school attendance areas shall be used only for instructional costs associated with providing Title I instructional services to private school children who are failing or at risk of failing and reside in participating public school attendance areas. Instructional expenses include such costs as teachers’ salaries, fringe benefits, books, workbooks, computers and computer software. The number of private school children from low-income families, upon which the generation of funds is based, does not need to be the same as the number of at-risk private school children being served, nor do the pri-

private school children served need to be those who generated funds.

The LEA officials, in consultation with private school officials, may pool funds for instruction in private schools or groups of private schools, such as schools of one religious denomination. The pooled funds are used to serve those private school students most at risk, as determined in consultation, who reside in participating public school attendance areas. When funds are pooled, the most at-risk children, as determined in consultation, receive services first, regardless of the amount of funds that was generated based on the number of children from low-income families attending that private school.

Selected Practices and Tools

■ Determining Allocations for Equitable Services

According to Sec. 1120(c) of Title I, an LEA may calculate the number of private school children who are from low-income families and live in participating public school attendance areas in several ways:

1. **Using the same measure of poverty as for public school children.** If available, an LEA should use the same measure of poverty used to count public school children, e.g., free and reduced-price lunch data.
2. **Using comparable poverty data from a survey and extrapolating such survey results if complete actual data are unavailable.**
 - a. In order to obtain the number of private school children from low-income families, an LEA may use a survey to obtain poverty data comparable to those used for public school children. To the extent possible, the survey must protect the identities of families of private school children. The only information necessary for an LEA to collect in such a survey of private school children is:
 - (1) geographic information verifying residence in a participating public school attendance area;
 - (2) grade level or age of each child; and
 - (3) income level of parents.
 - b. An LEA may not require that the private school officials give the names of low-income families.
 - c. After obtaining income data from a representative sample of families with children in private school, an LEA must extrapolate those data to the entire private school student population if complete actual data are unavailable. The LEA officials should take care to ensure that the data are truly representative of the private school students in the district.
3. **Using comparable poverty data from a different source.** If data from the same source used for public school children are not available, an LEA may use poverty data for private school children that are from a different source than the data it uses for public school children provided the income threshold in both sources is the same. For example, an LEA uses data from the free and reduced-price lunch program, but private school children do not participate in this program; however, private school officials are able to provide an LEA with a count of children who are from low-income families using other sources of poverty data, such as Temporary Assistance to Needy Families (TANF) or tuition programs for needy students. If the different sources use different definitions of low-income, an LEA would need to adjust the results accordingly.
4. **Using proportionality.** An LEA may apply the low-income percentage of each participating public school attendance area to the number of private school children who reside in that school attendance area. To do this, an LEA will

need the addresses and grade levels of those students attending private schools.

For example, an LEA calculates the percentage of those from low-income families in a public school attendance area to be 60 percent. The LEA then applies this percentage of the public school attendance area to the number of private school children residing in that public school attendance area. So, if the number of private school children residing in the public school attendance area is 50, then 60 percent of 50 children or 30 children are considered to be from low-income families. The LEA calculates the per-pupil amount based on this number (i.e., 30 children).

5. **Using an equated measure.** LEA officials may use an equated measure of low-income by correlating data from different sources—that is, determining the proportional relationship of data on public school children from two sources and equating that ratio to a proportion for private school children, using data from one of the same sources. For example, an LEA uses free and reduced-price lunch data, but those data are not available for private school students. However, if TANF data are available for both public and private school students, the LEA officials could determine an equated measure of private school students from low-income families based on free and reduced-price lunch data by correlating the two sets of data as follows: number of public school students in TANF is to number of public school students in free and reduced price-lunch as number of private school students in TANF is to X:

$$\frac{\text{TANF (public)}}{\text{free \& reduced-price lunch (public)}} = \frac{\text{TANF (private)}}{X \text{ (private)}}$$

In this example, the LEA may then use the equated number of private school students based on free and reduced-price lunch data (“X”) as the number of private school students from low-income families.

Tools 2.1A and 2.1B—Sample Letters to Parents to Accompany Poverty Data Survey Forms

Tools 2.2A and 2.2B—Sample Poverty Data Survey Forms to Be Completed by Private School Families

Tool 2.3—Sample Letter From Selected Diocesan Official to LEA Providing Data on Students Meeting the Poverty Criteria

Tool 2.4—Sample Form From Private School Officials Reporting Information From Poverty Surveys to LEAs

■ **Extrapolation**

When not all surveys collecting comparable poverty data described above are returned, LEA officials must extrapolate the data received to the total number of surveys distributed.

Tools 2.5A and 2.5B—Extrapolating Poverty Data by LEA Officials

■ **Reservation of Funds**

An LEA must reserve funds from its total Title I allocation for specific purposes required under Sec. 200.77 of the regulations. The equitable services requirement applies to some reservations. For example, Sec. 1120 of Title I requires that the LEA provide equitable services to teachers and families of private school participants from reserved professional development funds (under Sec. 1119 of Title I) and reserved parental involvement funds (under Sec. 1118 of Title I), respectively. In addition, if an LEA reserves funds from its total allocation for districtwide instructional activities and programs for elementary or secondary public school children, or both, an equitable share must be allocated for services to similar private school children. The services that will be provided with these funds are determined in consultation. Examples of districtwide services for elementary and secondary school students include summer school programs and the provision

of reading specialists and mathematics tutors in all Title I schools.

The equitable services requirement does not apply to some other reservations, such as costs to administer the Title I program, funding for programs for homeless, neglected, and delinquent children, and costs for school and district improvement activities required under Sec. 1116.

Tool 2.6—LEA Worksheet to Calculate Equitable Share of LEA's Reservations

Transferability

The transferability authority under Title VI in the *Elementary and Secondary Education Act* allows LEAs to move funds among some federal education programs. If the LEA transfers funds into Title I from other federal programs, the funds become, in effect, Title I funds and are subject to all requirements applicable to Title I. (Note: An LEA cannot transfer funds from Title I.) Thus, the equity service requirements for the participation of private school children apply to these funds. If the LEA transfers funds under the transferability authority into Title I programs that require equitable participation of private school children, the LEA must consult with private school officials prior to transferring funds. Funds may not be transferred for the sole purpose of meeting the needs of the private school children.

Carryover Funds

An LEA that has not obligated or spent all of the funds generated on the basis of the number of either public or private school children by the end of the current school year may carry over these funds into the next year, provided that the amount carried over does not exceed 15 percent of the LEA's total Title I, Part A, allocation. Generally, any carryover funds would be part of the LEA's total resource base in the following year. Although LEA officials have some flexibility in how they use carryover funds, the LEA officials must ensure that private

school children are served on an equitable basis. For example, an LEA could:

- ❖ Add carryover funds to its current year allocation and distribute funds to participating attendance areas and schools in accordance with allocation procedures outlined in Sec. 1113 of Title I and ensure equitable participation of eligible private school children.
- ❖ Allocate funds to public schools with the highest concentrations of poverty in the LEA, thus providing a higher per-pupil amount to those public schools, but ensuring equitable participation of eligible private school children residing in the attendance areas of these public schools.
- ❖ Provide additional funds to any of the activities supported by the required reservations in Sec. 200.77 of the Title I regulations. (Note: If an LEA adds carryover funds to a reservation to which equitable services apply [e.g., parental involvement], the LEA also must calculate and provide equitable services from the carryover funds.)

However, there may be some cases in which an LEA must use unobligated funds generated by low-income private school children that are available for carryover specifically for private school children in the following year rather than add them to the general resources of the LEA in the following year. For example, suppose an LEA experienced a delay in implementing an equitable program for eligible private school children because of consultation and notification issues between private school officials and LEA officials. As a result, the LEA could not spend all the funds it had available to provide equitable services to private school children in the current year. The LEA would need to use those funds that carried over into the next year specifically to provide equitable services to eligible private school children that next year. These carryover funds would be in addition to funds that the LEA would otherwise be required to use to provide equitable

services for eligible private school students from the LEA's current year allocation.

Tool 2.7—Qs and As on Application of Equitable Services to Carryover Funds

These questions and answers give examples of the conditions under which an LEA is required to apply equitable services to carryover funds.

■ Allocating Title I Funds, Using School-by-School and Pooling Options

The amount of funds available to provide Title I services is based on the number of public and private school children who are from low-income families and reside in participating public school attendance areas. The funds available for Title I services for eligible private school children are based on the amount of funds generated by private school children from low-income families. These funds must be expended to meet the education needs of eligible private school children. In order for meaningful consultation to occur, LEAs should inform the private school officials of the amount of Title I funds generated based on the number of private school children from low-income families. The determination of how funds are allocated is a consultation topic.

In consultation, the LEA and private school officials may choose one or both of the following options for using the funds reserved for instructional services for eligible private school children.

- ❖ **School-by-School Option:** Provide equitable services to eligible children in each private school with the funds generated by the children from low-income families who reside in participating public school attendance areas and who attend that private school.
- ❖ **Pooling Option:** Combine funds generated by all private school children from low-income families who live in all participating areas to create a pool of funds from which the LEA provides equitable

services to eligible private school children who are in the greatest need of education services and reside in participating public school attendance areas. If LEA officials pursue this option, the LEA officials, in consultation with officials from the private schools, must establish criteria to determine the eligible private school children who are most at risk and, therefore, in the greatest need to receive services. Under this option, the services provided to eligible children attending a particular private school do not depend on the amount of funds allocated for children in that school.

Tool 2.8—Example of How an LEA Applies the School-by-School and Pooling Options for Allocating Funds

This example details the steps involved in allocating funds generated by private school students for instructional services using the school-by-school and pooling options.

Tool 2.9—Sample Chart on the Calculation of Funds Available to Provide Title I Services to Eligible Private School Children

■ Determining the Need for Services

To be eligible for Title I services, a private school child must reside in a participating public school attendance area and must meet the requirements in Sec. 1115 (b) of Title I, which states that children be identified as failing or at risk of failing on the basis of multiple, educationally related, objective criteria. Certain children may be identified as eligible solely by virtue of their status; for example, homeless children or children who participated in Head Start, Even Start, or Early Reading First within the past two years are eligible for Title I services. Children from preschool through grade 2 are selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.

The first step is for the LEA officials, in consultation with private school officials, to establish criteria for determining the children eligible for Title I services. Once a pool of eligible children is established by the private school officials using the agreed-upon criteria required under Sec 1115(b), the LEA officials, in consultation with private school officials, determine which children are the most at risk, and, therefore, which will receive services.

LEA officials can make this determination in different ways. For example, LEAs may ask private school classroom teachers for specific recommendations on which students could benefit from the Title I program. Other LEA officials provide private school principals and teachers with a ranking sheet that rates the skills and abilities of potential students. Whatever criteria are used by the LEA and private school officials, the criteria must be objective and applied uniformly across the district.

Tools 2.10A, 2.10B, 2.10c, and 2.10D—*Sample Instruction Sheet and Recommendation Forms to Be Completed by the Private School Classroom Teachers*

Tools 2.11A and 2.11B—*Sample Referral Forms for Determining the Most Educational Needy Children for Reading and Mathematics*

Tool 2.12—*Sample Recommendation Form to Be Completed by the Private School Classroom Teacher*

■ Program Design

Preliminary work on the program design that meets the education needs of the private school participants begins either during consultation meetings or workshops attended by both public and private school officials. The private school officials should attend these meetings and workshops knowing their student needs and with suggested strategies for meeting those needs. Both parties, not one party bringing a completed design plan to the second party for approval, should be involved in developing a preliminary design for Title I ser-

vices. However, the LEA makes the final decision on the program design for the Title I services, and is responsible for implementing these services, hiring staff members, and paying for services provided. The LEA may not delegate these responsibilities to the private school officials.

Tool 2.13—*Sample Agenda for a Program Design Workshop*

■ Communication With Classroom Teachers

To help ensure that the Title I instructional program supports instruction in the regular classroom and promotes the achievement of Title I children in the regular classroom, some LEAs provide forms to record regular contact between Title I teachers and private school classroom teachers throughout the year. Also, some private school teachers share their weekly lesson plans with the Title I teacher so that the Title I program is aligned weekly with instruction occurring in the regular classroom.

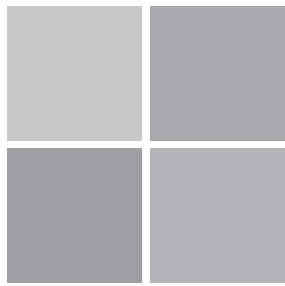
Tools 2.14A, 2.14B, 2.14C, and 2.14D—*Sample Communications Forms for Use Between Private School Classroom and Title I Teachers for Classroom Instruction*

■ Instructional Materials and Equipment

Under Sec. 200.66 of the Title I regulations, Title I funds may only be used to meet the educational needs of participating private school children. The LEA may not use Title I funds for the needs of the private school or the general needs of the children in the private school. The LEA must have control of the Title I funds at all times and the LEA must have the title to materials, equipment, and property purchased with Title I.

Tools 2.15A and 2.15B—*Certification Forms to Be Completed by the Title I Teachers for Title I Materials*

It is important that the LEA have a method to track materials, equipment, and property purchased with Title I funds and located in the private school.



Tools

**Tool 2.1A—A Sample Letter to Parents From Private School Principal or LEA Title I Coordinator
Explaining the Need for Poverty Data to Accompany Income Determination Form**

Letterhead

[Insert Date]

Dear Family:

We need your help! [Name of private school] has an opportunity for the children who really need extra academic support to receive it through the Title I program under *No Child Left Behind Act*, but we can't do it without YOU! These extra services will only come to the children if you fill out the attached survey.

In order to determine the funding available for this wonderful program, we must have an accurate count of children from low-income families. I want to assure you that your privacy will be protected and that no names are required on the enclosed form. Each form has a unique identifying number only to monitor the total of surveys returned, and the match between your name and the number is confidential. *Only* the address and grade levels are provided to the school district so that its staff members can determine the funding for the Title I program for the eligible children.

Thank you for giving this your immediate attention. If you have any concerns or questions, please call me at [insert phone number and e-mail address].

Sincerely,

[Private school principal or LEA Title I Coordinator]

Enclosure

Tool 2.1B: Another Sample Letter From the Private School Principal to Accompany the Family Survey

Letterhead

[Insert Date]

Dear Families,

Our local school district is responsible for implementing a federal education program entitled Title I, which offers instructional services to public and private school children who are at risk of failing. The additional instruction provided by the Title I program helps participating children acquire the knowledge and skills they need to meet challenging achievement standards.

We have an opportunity for our children to receive these services, but I need you to complete the enclosed family survey form. The information you provide will determine the amount of funds the school district has available for these special services. All you need to do is circle the YES or NO after each question. Your answers will be strictly CONFIDENTIAL. Only I will use this information. To protect your confidentiality, names are not required.

This information is very important and it will help our children to continue to participate in the Title I education program. Please help us help your children.

Please return your family survey form to my office in the enclosed envelope marked with my name and "Confidential Information." I need them no later than [insert date]. Remember that this information is CONFIDENTIAL. I will be the only one to read it.

If you have any questions please call me at the school office at [insert telephone number].

Thank you for all that you do for our children.

Sincerely,

Principal

Enclosures

Tool 2.2A—Sample Poverty Data Survey Form to Be Completed by Private School Families

This form uses free and reduced-price meal income levels as the threshold to determine eligibility.

Income Determination Form

Family Address _____

Age or grade levels of children living in your household and attending [insert name of private school]: _____

A. Locate your household size and the minimum allowable income earned each month. If your monthly income is equal to or less than this amount, please check here: _____:

| Family size | Income earned each month* |
|--|---------------------------|
| 1 | \$1,476 |
| 2 | \$1,978 |
| 3 | \$2,481 |
| 4 | \$2,984 |
| 5 | \$3,486 |
| 6 | \$3,989 |
| 7 | \$4,491 |
| 8 | \$4,994 |
| For each additional family member, add \$503 | |

*The 2006-07 and income guidelines for future school years can be found at www.fns.usda.gov/cnd/governance/notices/iegs/iegs.htm.

B. Is your family qualified for food stamps?
 Yes No

C. Are you receiving Temporary Assistance to Needy Families (TANF) Assistance? (Formerly Aid to Families with Dependent Children or Public Assistance)
 Yes No

Please return this form to:
 [Insert name and contact information of person who signed the letter.]

Tool 2.2B: Poverty Form Accompanying Letter From Private School Principal or LEA Official to Be Completed by Parents

Family Survey Form

The purpose of this survey is to collect data that will be used to determine the amount of funds available for the public school district to provide Title I instructional services to eligible students in our school. Determining the number of our students, by public school district of residence, who would qualify for free and reduced-price meals, accomplishes this. The information requested below is confidential. It is not necessary to provide your family name. **Thank you for your cooperation and prompt return of this form.**

(1) Find your family size and look at the annual gross income level listed beside it on the chart printed below.

| Number of Family Members | Annual Gross Income for 2005–06* |
|--|----------------------------------|
| 1 | \$17,705 |
| 2 | \$23,736 |
| 3 | \$29,767 |
| 4 | \$35,798 |
| 5 | \$41,829 |
| 6 | \$47,860 |
| 7 | \$53,891 |
| 8 | \$59,922 |
| For each additional family member, add \$6,031 | |

* If you are paid on a weekly or monthly basis, please multiply that amount by the number of weeks or months actually worked each year to determine your annual gross income.

(2) Answer the following questions:

Is your family income less than the amount on the chart on the line beside your family size?
 Yes No

Is your family qualified for food stamps?
 Yes No

Are you receiving Temporary Assistance to Needy Families (TANF) Assistance?
 (Formerly AFDC or Public Assistance)
 Yes No

3) Please provide the following information:

Address: _____

Public school district in which you reside: _____

Grade levels of your children: _____

Please return this form to: [Insert name and contact information of person signing the letter.]

Tool 2.3–Sample Letter From Selected Diocesan Official to LEA Providing Data on Students Meeting the Poverty Criteria

[Letterhead]

[Insert Date]

Director of Federal/State Programs
 Union County School District
 500 North Main Street
 Suite 700
 City, State, Zip Code

Dear _____:

Enclosed you will find Title I participation forms from seven Catholic schools. The forms list the addresses and grade levels of students attending the schools listed below who meet the Title I poverty criteria for the Union County School District. Since the Title I funding is based on where these students live, we are sending this information to you so that you can determine if they live in participating public school attendance areas. The seven schools are:

Our Lady of Assumption [address]
 Saint Ann [address]
 Saint Gabriel [address]
 Saint Matthew [address]
 Saint Patrick [address]
 Holy Trinity Middle School [address]
 Central Catholic High School [address]

If I can be of assistance in hosting a meeting with the principals of these schools, I am more than happy to do that. If there is anything else I can do to help facilitate private school children receiving Title I services, please feel free to contact me at any time.

Thanks for all you do for all children living in the Union County School District.

Sincerely,

Superintendent of Schools
 Diocese of _____

Tool 2.5A—Example of Extrapolating Poverty Data

Calculating the Number of Low-income Private School Children By Extrapolating Family Survey Data

| Column 1 | Column 2 | Column 3 | Column 4 | Column 5 |
|-------------------------------|---|---|--|--|
| Public school attendance area | No. of resident private school children | No. of private school children submitting surveys | No. of low-income private school children from surveys | Extrapolated no. of low-income private school children |
| A | 150 | 115 | 100 | 130 |
| B | 20 | 10 | 4 | 8 |

Calculations to determine the number of private school children from low-income families using extrapolation:

To determine the extrapolated number of low-income children (Column 5):

1. Divide the number of low-income private school children from the survey (Column 4) by the number of private school children submitting survey (Column 3).
2. Multiply that number by the number of resident private school children (Column 2).

For example, in the above chart:

- For attendance area A, the calculations are: $100/115$ times $150 = 130$ private school children.
- For attendance area B, the calculations are: $4/10$ times $20 = 8$

Tool 2.5B—Sample Form for Extrapolating Poverty Data by LEA Officials

During consultation, the LEA may make this form available to private school officials.

Letterhead

Title I Report on the Number of Low-Income Private School Children Based on Extrapolation of Data

[Insert Name of School District]

Private School Name _____

Address _____

Phone number _____

Total number of private school children enrolled: _____ as of _____
Date

Extrapolation from a representative sample of actual data: *If complete actual data are not available, an LEA extrapolates the number of low-income private school children from actual data on a representative sample of private school children. The representative sample size should be large enough to reasonably conclude that the poverty estimate is accurate.*

| | | | | |
|--|---|--|---|---|
| Extrapolated number of students from low-income families | = | $\frac{\text{Total private school enrollment}}{\text{Total number of returned surveys}}$ | X | Total number of low-income children on returned surveys |
|--|---|--|---|---|

Number of private school students from low-income families as **extrapolated** from the above information:

Prepared by: *Print Name* _____ *Signature* _____
Date Prepared _____

Tool 2.6–LEA Worksheet to Calculate Equitable Share of LEA’s Reservations

District _____

**LEA Worksheet to Determine the Amount of
Title I Funds for Equitable Services**

1. Districtwide Instructional Program(s) Reservation (does not apply to preschool programs)

In **participating** public school attendance areas:

No. of private school children
from low-income families

Total no. of children
from low-income families

_____ ÷ _____ = _____ Proportion of Reservation

_____ (Proportion of Reservation) x \$ _____ Reservation = \$ _____ for Equitable Services

2. Parental Involvement Reservation under Sec. 1118 of *ESEA*

In **participating** public school attendance areas:

No. of private school children
from low-income families

Total no. of children
from low-income families

_____ ÷ _____ = _____ Proportion of Reservation

_____ (Proportion of Reservation) x \$ _____ Reservation = \$ _____ for Equitable Services

3. Professional Development Reservation under Sec. 1119 of *ESEA*

In **participating** public school attendance areas:

No. of private school children
from low-income families

Total no. of children
from low-income families

_____ ÷ _____ = _____ Proportion of Reservation

_____ (Proportion of Reservation) x \$ _____ Reservation = \$ _____ for Equitable Services

Tool 2.7–Qs and As on Application of Equitable Services to Carryover Funds**Questions and Answers on the Application of Equitable Services to Carryover Funds Using Specific Examples**

- Q. 1.** The Carrier School District designed an equitable services program through the consultation process with officials from four private schools with eligible Title I children residing in the LEA. However, when the teacher assigned to two of the private schools resigned, no replacement was found and services stopped for participants in those two schools in late January. As a result, \$35,000 remains from funds generated by private school students from the low-income families. What happens to the funds?
- A. 1.** Because equitable services were not provided during the school year, the \$35,000 must be carried over and added to the next year's pool that private school students generate. This carryover is not added to the total LEA allocation and is not used by the public school Title I program. It must be reserved to make up for the lack of equitable services during the previous school year.
- Q. 2.** The Snowden School District designed an equitable services program through the consultation process with officials from four private schools with Title I eligible children residing in the LEA. At the end of the school year, \$10,000 remained from the funds available to serve private school children and \$45,000 remained from the funds available to serve public school children. What happens to the \$55,000 of Title I funds not expended?
- A. 2.** If the private school officials concurred that their eligible private school children received equitable services, the \$55,000 remaining from both Title I programs at the end of the school year is carried over into the next school year's budget. In the next school year, the LEA reserves funds from the current year funds (for variables such as administrative costs, professional development, parent involvement, choice-related transportation and supplemental services, homeless children, etc.) in accordance with Sec. 200.77 of the regulations. The LEA does NOT include carryover funds when determining current year reservations. After the reservation determinations, the LEA has several options for allocating the \$55,000 carryover funds, including adding it to any of the Sec. 200.77 reservations or adding it to the funds for school attendance areas, or both.

Tool 2.8—Example of How an LEA Applies the School-by-School and Pooling Options for Allocating Funds

How an LEA Allocates Funds for Title I Instructional Services For Eligible Private School Children: Example

There are five public school attendance areas. Three public school attendance areas participate in Title I, and two public school attendance areas do not participate.

There are two private schools that have students from low-income families residing in all five public school attendance areas. This example demonstrates how an LEA determines the per-pupil allocation (PPA) for the Title I program for eligible private school children.

Step 1: Determine the number of private school children from low-income families in each public school attendance area. The determinations are made on where each child resides and not on the address of the private school. In this example, Private School No. 1 has 20 children from low-income families residing in Attendance Area A; 20 children residing in Attendance Area B; and two children residing in Attendance Area D. Private School No. 2 has 13 children in Attendance Area C and 4 children in Attendance Area E.

Number of Private School Children From Low-income Families by Public School Attendance Areas

| Public School Attendance Area | Number of Low-income Children Attending Private School No. 1 | Number of Low-income Children Attending Private School No. 2 | Per Pupil Allocation (\$) | Funds Generated (\$) |
|--|--|--|---------------------------|----------------------|
| Public School A (Title I Area) | 20 | 0 | 400 | 8,000 |
| Public School B (Title I Area) | 20 | 0 | 200 | 4,000 |
| Total Funds Generated by Children Attending Private School No. 1 | | | | 12,000 |
| Public School C (Title I Area) | 0 | 13 | 200 | 2,600 |
| Public School D (non-Title I Area) | 2 | 0 | 0 | 0 |
| Public School E (non-Title I Area) | 0 | 4 | 0 | 0 |
| Total Funds Generated by Children Attending Private School No. 2 | | | | 2,600 |
| Total Funds Generated by Children Attending Both Private Schools | | | | 14,600 |

Tool 2.8—Example of How an LEA Applies the School-by-School and Pooling Options for Allocating Funds (continued)

How an LEA Allocates Funds for Title I Instructional Services For Eligible Private School Children: Example (continued)

Step 2. Multiply the number of low-income children by the per-pupil allocation (PPA) for each public school attendance area in which the private school children reside. In this example, in Attendance Area A, with a PPA of \$400, the 20 private school children from low-income families generate \$8,000 to be used for Title I instructional services. Attendance Area B’s PPA is \$200; therefore, 20 private school children generate \$4,000. Attendance Area C’s PPA is \$200; therefore, 13 private school children generate \$2,600. The private school children from low-income families in Attendance Areas D and E do not generate any funds for Title I instructional services because these areas are not participating Title I attendance areas (and, therefore, their PPAs are \$0).

Step 3: After consultation with private school officials, the LEA determines which option it will use to fund the Title I programs for eligible private school children.

Option 1. School-by-School: Use funds generated by private school children from low-income families to provide Title I instructional services on a school-by-school basis to eligible private school children residing in participating public school attendance areas.

| Private School No. 1 | Private School No. 2 |
|--|--|
| 20 Low-income Residing in A = \$8,000 | 13 Low-income Residing in C = \$2,600 |
| 20 Low-income Residing in B = \$4,000 | <u>4 Low-income Residing in E = \$0</u> |
| <u>2 Low-income Residing in D = \$0</u> | |
| Total for services to eligible children attending private school no.1 = \$12,000 | Total for services to eligible children attending private school no. 2 = \$2,600 |

Option 2. Pooling: Combine (pool) funds generated by all private school children from low-income families to be used to provide Title I instructional services to eligible children who reside in participating public school attendance areas and attend any private school.

| |
|--|
| Private School No. 1 = \$12,000 |
| Private School No. 2 = <u>\$2,600</u> |
| Total for services to the eligible children in any private school = \$14,600 |

Tool 2.9–Sample Chart on the Calculation of Funds Available to Provide Title I Services to Eligible Private School Children

This is a sample chart and is not representative of any specific LEA.

Calculating the Funds Available to Provide Title I Services For Private School Children: Example

| Public School Attendance Areas* | Per-Pupil Amount ** by Public School Attendance Area | Number of Public School Low-income Children by Attendance Area | Number of Private School Low-income Children by Attendance Area | Total Allocation for Each Attendance Area (A x [B+C]) | Amount Available for Instructional Services to Private School Students (A x C) |
|---------------------------------|--|--|---|---|--|
| | <i>Column A</i> | <i>Column B</i> | <i>Column C</i> | <i>Column D</i> | <i>Column E</i> |
| Mendoza | \$362 | 707 | 21 | \$263,536 | \$7,602 |
| Jara | \$362 | 506 | 10 | \$186,792 | \$3,620 |
| Kirkpatrick | \$362 | 379 | 3 | \$138,284 | \$1,086 |
| Elder | \$312 | 990 | 11 | \$312,312 | \$3,432 |
| Washington | \$312 | 395 | 2 | \$123,864 | \$624 |
| South Hills | \$260 | 567 | 3 | \$148,200 | \$780 |
| Burton Hill | \$210 | 282 | 1 | \$59,430 | \$210 |

Definitions:

* Public School Attendance Area is defined as the geographical area from which a public school draws children.

** Per-Pupil Amount (PPA) is defined as the amount of funds available for instructional services, based on the amount an LEA allots to each child who is from a low-income family and resides in a participating public school attendance area.

In order to determine the amount of funds available to provide the Title I services to eligible private school children, LEA officials multiply the number of private school children from low-income families (Column C) by the PPA (Column A). Thus, the 21 private school children from low-income families who live in the Mendoza School attendance area generated \$7,602 for the Title I program for eligible private school children.

Tool 2.10A–Sample Private School Instructions on How to Use the Referral Forms (2.10B, 2.10C, and 2.10D) to Identify the Most Educationally At-risk Children for Title I Services (Note: The referral forms directly follow.)

LEA Procedures for Identifying Eligible Private School Students Most in Need of Services To Be Used With the Following Referral Forms

Instructions

1. Explain to private school principals and teachers how to complete the Title I referral forms.
2. Collect forms from the principals and teachers.
3. Total columns(s) checked.
4. Delete private school students not eligible by attendance area.
5. Tally number of eligible students.
6. Create list of students by ranking number (1 through 9) who are most at risk using the procedures for ranking listed below.

Identifying the Most At-risk Students, Grades 1–8, Using the Teacher Title I Referral Form

The first step is to identify students, Grades 1–8, who are qualified to be considered for Title I services. If the following columns are checked, the student may be eligible for Title I services.

1. Score on a nationally norm-referenced test. There must be a test score to qualify and the score must be at 49 percent or below.
2. Student Profile – One checked column;
3. Reading or Math skills – Four or more checked columns in each subject;
4. Dispositions – One or more checked columns;
5. Recommend for Title I – Column must be checked.

Tool 2.10A–Sample Private School Instructions on How to Use the Referral Forms (2.10B, 2.10C, and 2.10D) to Identify the Most Educationally At-Risk Children for Title I Services (continued) (Note: The referral forms directly follow.)

LEA Procedures for Identifying Eligible Private School Students Most in Need of Services To Be Used With the Following Referral Forms (continued)

Procedure for Ranking

Using the information on the Title I referral form the LEA creates a rank ordered list of qualifying students by education need. An LEA must serve those students in greatest need first.

For kindergarten students: The “Recommend for Title I Class” column must be checked, as well as a minimum of five additional columns, in order to receive services.

For students in grades 1–8 rank for each subject recommended in the following order:
1 = most at risk; 9 = least at risk.

1. Checks in the qualification columns in all five areas.
2. Checks in any three areas and a test score.
3. Checks in any four areas.
4. Checks in two areas and a test score.
5. Checks in any three areas.
6. Check in any area and a test score
7. Checks in any two areas.
8. A test score only.
9. Check in only one area.

Tool 2.11A—Another Sample Referral Form for Determining the Most Educationally Needy Children in Reading

Criteria in this sample were developed by one LEA, in consultation with private school officials.

Ranking of Private School Children for Title I Services

Private School _____

Private School Teacher _____ Grade _____

Instructional Area: Reading

Rank child on each ability using the following rating scale:
 1=very low, 2=low, 3=low average, 4=average, and 5=above average

| | | | | |
|--|--|--|--|--|
| Last, first name of child | | | | |
| Age and grade level | | | | |
| Sense of purpose for reading | | | | |
| Word recognition and analysis | | | | |
| Vocabulary or background for required task | | | | |
| Comprehension of written materials | | | | |
| Range of reading strategies | | | | |
| Awareness of audience and purpose in writing | | | | |
| Total (lowest total is greatest academic need) | | | | |

Tool 2.11B—Another Sample Referral Form for Determining the Most Educationally Needy Children in Mathematics

Criteria in this sample were developed by one LEA, in consultation with private school officials.

Ranking of Private School Children for Title I Services

Private School _____

Private School Teacher _____ Grade _____

Instructional Area: **Mathematics**

Rank child on each ability using the following rating scale:
1=very low, 2=low, 3=low average, 4=average, and 5=above average

| | | | | |
|---|--|--|--|--|
| Last, first name of child | | | | |
| Age and grade level | | | | |
| Number recognition and number sense | | | | |
| Computation and estimation | | | | |
| Measurement | | | | |
| Geometry | | | | |
| Probability and statistics | | | | |
| Patterns, functions, and algebra | | | | |
| Ability to write an explanation that has sufficient details | | | | |
| Total (lowest total is greatest academic need) | | | | |

Tool 2.12—Another Sample Recommendation Form To Be Completed by the Private School Classroom Teacher

Teacher Recommendations of Students for Title I Program

School Year 20__ -- __

Dear Teacher,

I would appreciate your recommendation of your academically needy students as we begin planning next year’s Title I program. In order to facilitate the identification of students who may benefit from the Title I program in the next school year, please list their name(s) and third quarter grade. These are the students who are at risk of failing or are failing (e.g., having received a D or F in Reading or Math). If a student is at risk of failing or is failing in both subjects, please list the information on separate lines.

Please return this form to the school office as soon as possible, but **no later than [Insert date]**. This will help with planning and implementing services as soon as possible. Thanks so much!

Title I Teacher _____

| Last name, first name | Reading or math | Third-quarter grade |
|-----------------------|-----------------|---------------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Private School _____ Grade _____

Teacher _____

This information will be kept private and confidential.

Tool 2.13--Sample Agenda for a Program Design Workshop**Program Design Workshop****A Consultation Meeting Between Public and Private School Officials
To Design a Title I Programs for [insert school year]****[Insert Date]****AGENDA**

Desired Outcomes: *By the end of today's meeting, participants will have reached consensus on their recommendations for how [insert name of school district] will provide services to eligible private school children for the [insert school year].*

8:30 Welcome and Recap of Previous Discussions *Title I Coordinator*

Previous Discussions:

- The amount of Title I funding available for instructional services
- Identifying the needs of eligible children
- Services that will be offered to eligible children

9:15 Setting the Stage – Purpose of Today's Meeting *Title I Program Specialist
LEA Curriculum Specialist
LEA Assessment Specialist*

Opening Activity

Brainstorming on the various ways Title I services could be delivered
List ideas
Informal Discussion of pros and cons of each idea

Narrowing the Discussion

Reducing program options by selecting the top five service models
Review options to determine if they meet participants' needs as determined by assessment data and if they are researched based.
Informal discussion on pros and cons

Closure

Reaching consensus
Select the service model(s) that best meets the participants needs

12:00 Next Steps, Issue(s) and Meeting Date(s) *Title I Coordinator*

Tool 2.14A–Sample Communication Form for Private School Teachers to Inform Title I Teachers of Classroom Instruction in Reading

Title I Program Coordination With Classroom Teachers

Grade _____ Unit Dates _____

Name of Private School Teacher _____

Subject: **Reading**

The key objectives in reading for this unit are:

Books recommended for out of class-time reading:

Key concepts that Title I should reinforce:

Comments on classroom performance of Title I students during the past unit:

May use the reverse side for additional comments.

Request meeting with Title I teacher: ____ Yes ____ No

Tool 2.14B—Sample Communication Form for Private School Teachers to Inform Title I Teachers of Classroom Instruction in Mathematics

Title I Program Coordination With Classroom Teachers

Grade _____ Unit Dates _____

Name of Private School Teacher _____

Subject: **Mathematics**

The key objectives in mathematics for this unit are:

Practice needed in these skills:

Key concepts that Title I should reinforce:

Comments on classroom performance of Title I students during the past unit:

May use the reverse side for additional comments.

Request meeting with Title I teacher: _____ Yes _____ No

Tool 2.14C–Sample Communication Form Between the Private School Teachers and the Title I Teachers

**Communication Form To Align
Title I Instruction With Instruction in the Classroom**

Date: _____

Title I Teacher _____

Classroom Teacher _____

Names of Students:

Dear Classroom Teacher,

As the Title I teacher, I have filled in the appropriate information below. Please do the same in the areas marked “classroom teacher current objectives.” Please return the form to me by the date below so I know if the Title I program is supporting your instruction. You may want to keep a copy for your records.

Reading, Phonics, and Word Analysis

Title I recently taught objectives _____

Classroom teacher current objectives _____

Reading Comprehension

Title I recently taught objectives _____

Classroom teacher current objectives _____

**Tool 2.14C–Sample Communication Form between the Private School Teachers and the Title I Teachers
(continued)**

**Communication Form To Align
Title I Instruction With Instruction in the Classroom
(continued)**

Math Computation

Title I recently taught objectives _____

Classroom teacher current objectives _____

Math Concepts and Application

Title I recently taught objectives _____

Classroom teacher current objectives _____

Classroom teacher: Please check here _____ if you would like to meet with me to discuss
classroom objectives

Please return this form by _____

Title I Teacher

Date: _____

Tool 2.14D–Teacher Observation Form of Current Academic Progress

Classroom Teacher Observation Form

Title I Student _____ Grade _____

Teacher _____ Date _____

Please indicate the student's current level of academic performance by circling "yes" or "no" for the following:

- | | | |
|--|-----|----|
| 1. The student follows simple oral directions. | Yes | No |
| 2. The student discriminates visual shapes, forms, and letters. | Yes | No |
| 3. The student discriminates sound for letters of the alphabet | Yes | No |
| 4. The student understands the direction of conventional print and where a word begins and ends. | Yes | No |
| 5. The student constructs a simple message using invented spelling. | Yes | No |
| 6. The student properly forms manuscript letters. | Yes | No |
| 7. The student communicates effectively in one-on-one and small group situations. | Yes | No |
| 8. The student listens to and can repeat rhymes, finger plays, songs, and poems. | Yes | No |
| 9. The student can respond to a story or oral reading by retelling and summarizing a story, recalling important facts and details, arranging events in sequential order, and distinguishing between real and make-believe. | Yes | No |
| 10. The student acquires and understands an age-appropriate basic sight vocabulary. | Yes | No |

Please return to the Title I teacher [insert name, if appropriate] by [insert date].

Tool 2.15A—Certification Form to Be Completed by Title I Teacher Three Times a Year Verifying the Title I Purchased Technical Equipment Located at the Private School

LEA officials should include with this form a list of Title I purchased technology equipment located in the private school. If an inventory update is needed, the Title I teacher should add or delete equipment no longer located in the private school.

Title I Program for Eligible Private School Students

Certification of Technology Equipment

Private School Name _____

Title I Teacher _____

By the signature below, the Title I teacher assigned to the program at this private school certifies that the technology equipment provided by the LEA (list attached) is located at this school site.

Beginning of
School Year _____
Teacher's signature _____ Date _____

Midyear _____
Teacher's signature _____ Date _____

End of School
Year _____
Teacher's signature _____ Date _____

In the event an inventory update is needed, please check the box below indicating the month when you signed and submitted this form with the updated list.

____ Attached is a list of the *updated* inventory of equipment, materials, and property paid with Title I funds for the month of _____ for the LEA files. I have kept a copy for my files.

Tool 2.15B—Certification Form to Be Completed by Title I Teacher Three Times a Year Verifying Title I Purchased Instructional Materials Located at the Private School

Title I Program for Eligible Private School Students

Certification of Instructional Materials

Private School Name _____

Title I Teacher _____

By the signature below, the Title I teacher assigned to the program at this private school certifies that the instructional materials are located at the school site as listed on the attached inventory form.

Instructional Materials

_____ Books
(Name of each book is on attached list.)

_____ Software

_____ Math Manipulatives

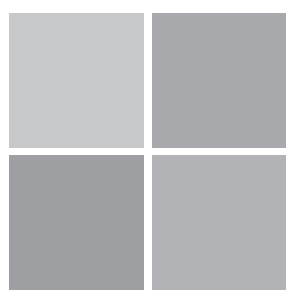
_____ Computers

_____ Other (please list):

Beginning of School Year _____
Teacher signature Date

Midyear _____
Teacher signature Date

End of School Year _____
Teacher signature Date



Equitable Participation of Private School Teachers Of Title I Participants

An LEA is required under Sec. 1119 of Title I, Part A, of the *Elementary and Secondary Education Act (ESEA)* to reserve at least 5 percent of its Title I allocation to provide professional development to the public school teachers who do not meet the “highly qualified” teacher requirements. An LEA also may reserve additional funds from its Title I allocation for other professional development activities. The Title I equitable services requirement applies to not only the funds that an LEA reserves under Sec. 1119 but also to any additional professional development reserves not earmarked for district and school improvement. The amount of funds available for the LEA to provide equitable professional development services to private school teachers of participating children must be proportionate to the number private school children from low-income families who reside in participating Title I attendance areas. It is important to note that these funds are not for Title I teachers, but are, instead, for the regular classroom teachers of private school children receiving Title I services. The professional development activities must be designed to help private school classroom teachers better meet the needs of private school children who receive Title I services from the LEA, not for general professional development needs of the teachers or the school.

Determination of Professional Development Needs

Private school teachers can provide valuable information about the performance of their Title I children that standardized tests and other measurements cannot provide, such as student performance on daily in-class assignments, homework, and special projects. This information may be used to deter-

mine the professional development activities for the private school teachers.

The professional development activities offered to private school teachers should reflect not only the needs of the children being served by the Title I program but also the skills and knowledge that private school teachers need in the classroom to better instruct the Title I children. After the first year of a program, the student assessment results also should determine the content of the next professional development program for private school teachers of Title I students. Both LEAs and third-party providers should use the consultation process to ensure that the professional development activities for private school teachers are designed to help Title I children in their regular classroom.

To follow are guidelines on allowable professional development activities for private school teachers of Title I participants.

Professional Development Planning Guidelines

As stated above, when an LEA reserves funds under Sec. 1119 from its total Title I allocation for carrying out Title I professional development activities, the LEA must provide equitable services to teachers of private school participants from this reservation and any other reservation for professional development not associated with districts or schools in improvement. As required under Sec. 200.65 of the Title I regulations, LEA officials determine the amount of these equitable services based on the reserved funds in proportion to the number of private school children from low-income families residing in partici-

pating public school attendance areas. Activities for the teachers of private school participants must be planned in meaningful consultation with private school officials prior to implementation.

The professional development activities for private school teachers of participating students should be ongoing and activities should address how these teachers can serve better their students who are at risk of failing. For example a professional development activity could provide information on research-based reading and mathematics instruction for at-risk children. It is prohibited to use Title I funds for activities that are designed to upgrade the instructional program in the regular classroom of the private school or meet the general needs of children in private schools.

LEA personnel or third-party contractors, such as those in institutions of higher education or independent education consultants, respectively, may provide professional development activities. Activities must be secular, neutral, and nonideological. All decisions regarding professional development activities for private school teachers of Title I participants are made through timely and meaningful consultation. The final decision is the responsibility of the LEA officials.

LEA officials' evaluations of the professional development activities should include the review of the participants' assessment scores to determine if the professional development activities improved student achievement, which is the ultimate goal.

Note: LEA and private school officials also should be aware that some professional development activities allowed under Title II, Part A, of the *ESEA* are not allowed under Title I of that act.

Selected Practices and Tools

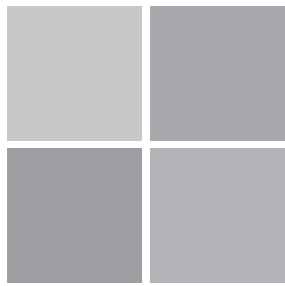
Tool 3.1A—Cover Memo for End-of-Year Title I Survey for Private School Teachers

Tool 3.1B—End-of-Year Survey for Private School Teachers

This is one method of gathering information that public and private school officials use to determine professional development needs and planning next year's Title I program

Tool 3.2—Sample of a Completed Needs Assessment Worksheet Indicating Proposed Professional Development Activities for Private School Teachers

This worksheet can provide an overall assessment of teacher needs to help in determining the most effective professional development activities for individual private school teachers.



Tools

Tool 3.1A—Cover Memo for End-of-Year Title I Survey for Private School Teachers

Letterhead

Memorandum

To: Principals of Private Schools

From: [Insert Name], Title I Coordinator

Date:

Subject: End-of-Year Private School Teacher Survey of Title I Programs

I am required under Title I to conduct a needs assessment of the eligible Title I children to determine the types of Title I programs the district should provide next year based on the children's needs. For that reason, I would appreciate your assistance in distributing the enclosed survey to your teachers who have Title I participants. The information they provide will be reviewed during consultation and will facilitate our planning for the upcoming school year.

End-of-Year Private School Teacher Survey: Please have your teachers with Title I participants complete the two-page survey. In addition to facilitating planning for the upcoming school year, we will use the information to evaluate the program effectiveness. If the teachers need additional writing space, they may use the reverse side of the survey.

This form should be returned to your office and then forwarded to me as soon as possible but no later than [insert date]. Please call me when the forms have been returned so we can make an appointment to review them together.

There are so many things to wrap up at the end of the year and I appreciate your help in obtaining this information on your Title I students. It has been my pleasure to work with you this school year and to visit your school. I look forward to providing Title I services to your eligible students during the upcoming school year. As always, please call me at [insert phone number] or e-mail me at [insert e-mail address] with any questions or concerns.

Tool 3.1B—End-of-Year Survey for Private School Teachers

End-of-Year Title I Survey for Private School Teachers

The Title I teachers need input from you, the private school teachers, regarding the effectiveness of the Title I services provided to your students. Your comments and suggestions are greatly appreciated and will help with future planning.

1. What is your homeroom grade? _____
2. How many students in your homeroom participated in the Title I program? _____
3. In what subjects did your students participate?
 _____ Reading _____ Mathematics _____ Both reading and mathematics
4. Have your Title I students improved their reading and mathematics skills, as well as attained academic achievement standards?

_____ Both skills improved and standards met
 _____ Only skills improved
 _____ Neither skills improved nor standards met

Comments: _____

5. Has this program helped your students improve their *view* of reading and mathematics in your classroom? (Put **R** for reading, **M** for mathematics, and **B** for both on the applicable response line.)

_____ Very much
 _____ Somewhat
 _____ Not at all
 _____ Unable to determine

Comments: _____

6. What features of the Title I program did your students seem to enjoy?
 _____ Getting more help for reading or mathematics, or both
 _____ Learning more easily, because there are fewer students in the class
 _____ Participating in a variety of activities
 _____ Having time away from the regular classroom

Other feedback: _____

Tool 3.1B—End-of-Year Survey for Private School Teachers (continued)

End-of-Year Title I Survey for Private School Teachers (continued)

7. Have the parents of your students asked you about the Title I program?

_____ Yes _____ No

8. Which subject area should receive priority in providing Title I instruction to academically at-risk students if the school district could only fund one area?

_____ Reading _____ Mathematics

9. In your opinion, what is the strongest feature of the Title I program?

_____ Extra support for improving reading, or mathematics, or both subjects

_____ Single subject (reading or mathematics) focus

_____ Small group instruction

_____ Other, please explain _____

Comments _____

10. How were you kept informed about your students' progress in the Title I program?

_____ In-person conference(s) with the Title I teacher

_____ Weekly coordination with the Title I teacher

_____ Sharing of progress reports by the Title I teacher

_____ Other communication (notes, letters, comments on students' work)

Comments _____

11. Please share any other comments regarding how Title I services can be improved.

Comments _____

Date survey was completed _____

PLEASE RETURN THIS SURVEY TO THE SCHOOL OFFICE
NO LATER THAN [insert date]

Tool 3.2—Sample of a Completed Needs Assessment Worksheet Indicating Proposed Professional Development Activities for Private School Teachers

Worksheet

Determining Professional Development Activities For Private School Teachers Based on Needs Assessments

LEAs and private school officials can use this worksheet to develop effective professional development programs for private school teachers of Title I children. Using the worksheet during consultation, LEAs and private school officials can identify: the needs of the private school participants and their teacher; the teacher's strengths; the most appropriate professional development to meet the identified needs; and the estimated cost of the professional development activity. To follow is a sample completed worksheet.

| Grade | Student Needs | Teacher Strengths | Teacher Areas of Need | Proposal for Professional Development | Estimated Cost |
|----------------|---|--|--|---|--|
| Grade 3 | Reading for comprehension; Increasing time on task | Excellent classroom management; creative approach to learning | Reading in the content area for at-risk students | Local university course, "Applying New Reading Research to Instruction in Content Areas for Low-achieving Students" | \$1,150 |
| Grade 2 | Reading fluency | Reading in the content areas | Analysis of and correction of reading problems | Quarterly in-service training with LEA reading specialist to develop skills to analysis reading problems | \$800 per person (when there is a class of 10 individuals) |
| Grade 1 | Letter recognition; Lack of phonic skills | Reading in the content areas | Phonics-based instruction | Quarterly in-service training with LEA reading specialist or 3-credit course at the local teachers college | \$800 \$900 for 3 credits |



Equitable Participation of Private School Families of Title I Participants

Research shows that parent involvement in the education of their children is a critical factor in improving their academic achievement. If students are to attain and maintain grade-level proficiency and achieve high academic standards, parents must support their children's learning.

An LEA reserves at least 1 percent of its total Title I allocation for parental involvement activities. A proportional share of these funds must be made available for parental involvement activities that benefit the families of private school Title I participants. The activities must be designed in consultation with private school officials. Parent or family involvement is more than just surveying parents or bringing them together for a meeting to listen—they also must be given opportunities for meaningful participation and active involvement. Parent involvement activities must be designed and implemented to meet the needs of the parents of Title I participants—not the needs of either the LEA or the private school. Parents of Title I participants should receive training and materials to help them work with their children to improve their children's achievement. It is important that the LEA officials, along with the private school officials, discuss with the parents of private school participants what training and materials would help them support their children's academic achievement. Public and private school officials should not assume what parents want. Parents should be *asked* what they want and need to help their children achieve.

Selected Practices and Tools

■ Parent Notification Offering Title I Services

After LEA officials have identified the private school Title I participants, and before any private school child is placed in the Title I program, the LEA officials should notify the child's parent(s) in writing to introduce the Title I program and to offer their child the opportunity to participate. Parents may or may not accept the Title I services offered. If a parent refuses to have a child participate, the LEA has no further obligations. The principal of the private school may wish to send a follow-up confirmation letter.

Tools 4.1A and 4.1B—*Sample Letters to Parents From the Title I Teacher Regarding Placement and Program Services for Title I*

Tool 4.1C—*Sample Follow-up Confirmation Letter to Parents From the Private School Principal Regarding Placement and Program Services for Title I*

■ Parent Meetings and Workshops

A meeting with parents early in the school year is a traditional way for the Title I teacher to become acquainted with the parents of his or her students. Parent meetings also should be scheduled throughout the year. When hosting a Title I meeting, the invitation should convey the purpose and importance of the meeting. The Title I teacher should offer a flexible number of meetings at a time and place that is convenient to the parents. Equally important is to advertise the meeting in a format and, to the extent practicable, in a language the parents can understand. The following meeting

announcements, agendas, and activities provide some ideas as to how to make parent involvement effective and interesting.

Tools 4.2A, 4.2B and 4.2C—Sample Flyers for Parent Meeting to Learn About the Title I Program

Tools 4.3A and 4.3B—Sample Cover Letter and Response Form for Invitation to a Title I Parent Information Night

Tool 4.4—Sample Invitation to Parents for Back-to-School Night

Tools 4.5A and 4.5B—Sample Agendas for Title I Program Parent Meeting

Tool 4.6—Sample Sign-in Form for Parent Meetings

Tool 4.7—Sample Form for Parent Evaluation of Workshop or Meeting

■ Examples of Title I Activities for Parents

Activities for parents of Title I children attending private schools are an important part of the Title I program and should give parents the tools to support their child's learning activities. Ideally, the Title I teacher should be seen by parents as an integral part of their child's education, not as only an "add on" to the regular classroom. In addition to special Title I activities, the Title I teacher should meet parents at parent-teacher conferences held at the private school.

Tool 4.8—Sample Flyer Inviting Parents to Participate in Guest Reader Program

Tool 4.9—Home Reading Contract Between a Title I Elementary School Child and a Parent, Guardian, or Other Family Member

Tool 4.10—Tips for Parents to Promote Reading

■ Communication With Parents

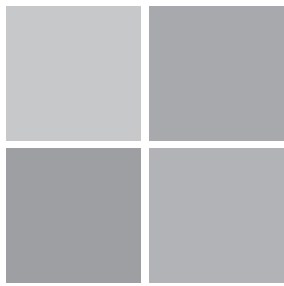
Regular and meaningful communication between the parents of Title I students and the Title I teacher helps both parties to be partners in helping the Title I participants learn. In addition, parents should receive regular reports on the progress of their child in the Title I classroom from the Title I teacher. Ideally, these reports should coincide with academic reports sent home to parents by the private school teachers. The reports should be straightforward and easy to understand. They also should show progress or lack of progress that a student makes from one marking period to the next.

Tools 4.11A, 4.11B, and 4.11C—Sample Student Progress Reports

■ Parents' Input on Their Child's Title I Program

The parents of Title I participants can provide valuable information about their children's Title I program. This information should include the parents' perception of the program and how they see their children responding and their children's impression of the services they are receiving. Capturing this information from parents of Title I participants is easier if the LEA provides an easy format for reporting key information.

Tools 4.12A, 4.12B, and 4.12C—Title I Program Parent Survey



Tools

Tool 4.1A–Sample Letter to Parents From the Title I Teacher Regarding Placement and Program Services for Title I

Letterhead

[Insert Date]

Dear Parents:

Your child, _____, has been selected to participate in the Title I* program. This program will help your child improve his or her proficiency in [insert reading, mathematics, or both] to help succeed in school.

Your child will attend class _____ times a week for approximately 40 to 60 minutes. During the Title I class, I will be working with your child to develop better skills in [insert reading, mathematics, or both].

Your child will have an opportunity to work in a small group where he or she will do many special activities. Your child will be provided instructional activities to help him or her in the areas that need strengthening. In some cases, your child instruction will work on a computer.

During the year, your child will bring home materials that that he or she will share with you. In addition, I will send home, with your child, monthly calendars of daily activities that you may employ to help you child succeed in school.

I also plan to have parent meetings to discuss ways in which you can help your child at home. I would greatly appreciate you letting me know what topics you would like covered.

Please sign the approval below and have your child return it to the school office so that I know you are aware of its content and agree that your child may participate in this educational opportunity.

Sincerely,

Title I Teacher

PARENTAL APPROVAL: I have read this letter and agree that my child may participate in the Title I program.

Child's name _____

Parent's signature: _____ Date: _____

** The Title I program is a federal program that provides supplemental educational services so that all children have a fair, equal, and significant opportunity to obtain a high-quality education.*

Tool 4.1B—Sample Letter to Parents from the Title I Teacher Regarding ESL Placement and Program Services for Title I

Letterhead

[Insert Date]

Dear Parents:

Your child, _____, has been selected to participate in the Title I* English as a second language program. This program will help your child improve his or her proficiency in English to help succeed in school.

Your child will attend class _____ times a week for approximately 40 to 60 minutes. During this class, we will be working on the skills of listening, speaking, reading, and writing English.

Your child will have an opportunity to work in a small group where he or she will do many special activities in English. Your child also will read many books, study special dictionaries to learn new vocabulary, and have an opportunity to learn English skills to help him or her in the work in the regular classroom. In some cases, your child will work on a computer.

During the year, your child will bring home special materials such as library books, audiocassettes, dictionaries, interesting booklets to complete at home, monthly calendars, and also suggested family activities that he or she will share with you.

We also plan to have parent meetings to discuss ways in which you can help your child at home. I would greatly appreciate you letting me know what topics you would like covered.

Please sign this letter below and have your child return it to the school office so that I know you are aware of its content and agree that your child may participate in this educational opportunity.

Sincerely,

Title I English as a Second Language Teacher

Parental Approval: I have read this letter and agree that my child may participate in the Title I program.

Child's name _____

Parent's signature: _____ Date: _____

* The Title I program is a federal program that provides supplemental educational services so that all children have a fair, equal, and significant opportunity to obtain a high-quality education.

**Tool 4.1C–Sample Follow-up Confirmation Letter to Parents From the Private School Principal
Regarding Program Services for Title I**

Letterhead

[Insert Date]

Dear Parents:

Through the Title I program,* some children in our school are entitled to special services from the [Insert name of school district]. I am happy to report that this year our students will have a Title I teacher from our local public school district assigned to the Title I program at our school. I hope you will join me in welcoming our Title I teacher to our school.

A number of our children in grades 1 through 8 will be receiving one-half hour of additional help in reading, math, or both each day. With your permission, your child will be included in this program and will, I am sure, profit from the extra time spent with a teacher in a small group.

Title I teachers always work closely with our classroom teachers to be sure that the children are getting the help they most need in order to succeed in the classroom. This program will not replace any existing services the children are receiving but, instead, will complement them.

Thank you very much. As always, please call on me if you have any questions.

Sincerely,

[Insert name], Principal

** The Title I program is a federal program that provides supplemental educational services so that all children have a fair, equal, and significant opportunity to obtain a high quality education.*

Tool 4.2A—Sample Flyer for a Parents Meeting to Learn About the Title I Program**Mark your calendar!****Plan to join the Title I staff
for a parent meeting.****Where:****When:**

Meet other families.
Learn about the Title I program.
Meet the Title I staff.
Bring home learning activities.

Free book to all families participating!
Snacks served!
Babysitting available!

We need YOUR input—Please join us!

Your student will bring more information home

Tool 4.2B–Sample Flyer for a Meeting to Learn About the Title I Program

[Insert name of school] School Announces

The first school year meeting of the
Grandparents Support Group!

Time: 8:30 a.m.–10:30 a.m.

When: Thursday, Oct. 21, 2005

Where: [Insert meeting location]

Topic: *Grandparents as Parents*

Come to learn practical tips that you can take home and implement and learn about community resources available to you.

**Call [insert name] for questions and to confirm your attendance.
[Insert phone number]**

We Need You! Please Come!

Tool 4.2C—Sample Flyer for Mother-Daughter Night Out

MOTHERS AND DAUGHTERS NIGHT OUT**Fourth-, Fifth-, and Sixth-Grade Girls
and Their Mothers**

Just a reminder for you about our meeting
at 7 p.m. on Tuesday, Oct. 26, 2005

Held at [insert meeting location]

Spend a fun evening together on reading and math
activities that both of you can do together.

**Homework Passes Will Be Given
To Students Who Attend!**

Refreshments will be served.

Please send in any suggestions or concerns you would like to discuss.

There is no need to sign your name.

Any questions?

Call [insert contact's name and phone number]

Sponsored by the Title I Program.

Tool 4.3A– Sample Cover Letter for Invitation to a Title I Parent Information Night

Letterhead

[Insert Date]

Dear Parents and Guardians,

I hope you can join us for a Title I Program Parent Information Night on [insert time and date] at [insert location]. This will be a wonderful opportunity for you to meet your child's Title I teacher, learn more about the Title I program, and learn activities that you and your child can do together at home to improve his or her reading and math skills.

At the meeting, you will:

- Meet your child's Title I teacher;
- Review your child's Title I instructional materials and learn about Title I activities;
- Have the opportunity to ask questions about the program and what you can do to support your child's learning;
- Meet other families of Title I students;
- Learn fun activities that you and your child can do together at home; and
- Have an opportunity to express any concerns about the program.

Please plan to join us! To reserve your place at the meeting, return the enclosed form to your child's Title I teacher no later than two days before the meeting. Refreshments will be served and free child care will be provided. Finally, if you need assistance with transportation, please indicate that on the enclosed form.

We look forward to meeting you.

Sincerely,

Title I Director

Enclosure

Tool 4.3B– Sample Response Form to the Invitation for a Title I Parent Information Night (Tool 4.3A)

Response Form for Title I Parent Night

Name of Parent _____ Child's Name _____

_____ Yes, I plan to attend the Title I Parent Information Night on [insert date]

_____ No, I do not plan to attend because _____

Do you need child care? _____ Yes _____ No

If yes, please list the names and ages of the children:

Do you need transportation assistance? _____ Yes _____ No

If yes, what assistance do you need? _____

Please return this form with your child to the Title I teacher by [insert date].

Tool 4.4–Sample of Invitation to Parents for Back-to-School Night

Letterhead

[Insert date]

Dear Parents,

Your child’s school is holding its annual back-to-school night on [insert date]. As your child’s Title I* teacher, I am looking forward to meeting and working with each and every one of you. As a parent, you are your child’s first teacher and I want to support you in this role.

At that time, I will be available during each of the sessions to meet you and share with you information on our Title I program, such as the exciting activities we have planned for your child.

Please stop by and introduce yourself. I have very much enjoyed working with your child over the past few weeks and look forward to meeting you.

Sincerely,

Title I Teacher

** The Title I program is a federal program that provides supplemental educational services so that all children have a fair, equal, and significant opportunity to obtain a high-quality education.*

Tool 4.5A– Sample Agenda for Title I Parent Meeting on Homework**Title I Parent Involvement Program****Homework Help and Study Skills Development
7:00 p.m., Wednesday, Oct. 13, 2004**

1. Introductions of presenters and parents
2. Why do teachers assign homework?
3. Solving homework problems
 - Small group activity to identify specific homework problems
 - What works and what doesn't work for solving problems
4. Making homework *less STRESSFUL for everyone*
 - Creating an environment
 - Homework “survival kit”
 - What is it?
 - How do I use it?
5. Homework contract between the student and the parent
 - What should it contain?
 - What do I do to individualize it?
6. Wrap-up (Questions and Answers)

Tool 4.5B– Sample Agenda for Title I Program Parent Meeting**Parent Meeting Agenda**
[Insert time, date, and location]**Agenda**

1. Welcome
...Private school principal and Title I coordinator
2. Introduction of Title I teacher(s)
...Title I coordinator
3. Instruction: curriculum, schedule, and materials
...Title I teacher(s)
4. Questions about the Title I program
...Parents and guardians
5. Group work on reading and mathematics activities to take home
...All participants
6. Refreshments and meeting other families
...All participants

Tool 4.6–Sample Sign-in Form for Title I Program Parents Meetings

Title I Program Parents Meeting

Parents, Please Sign In Below. Thank You!

| Name | Address and Phone Number | Student's Name and Grade Level |
|------|--------------------------|--------------------------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Tool 4.7—Sample Form for Parent Evaluation of Workshop or Meeting

Title I Program Evaluation of Today’s Workshop or Meeting

Topic: _____

Name of Private School: _____

Session Date: _____

Presenter(s): _____

| | Strongly Disagree | | | | Strongly Agree |
|---|----------------------|---|---|---|-------------------|
| 1. The content of the session was worthwhile. | 1 | 2 | 3 | 4 | 5 |
| 2. The session leader was well prepared. | 1 | 2 | 3 | 4 | 5 |
| 3. The information was effectively presented. | 1 | 2 | 3 | 4 | 5 |
| 4. The materials were useful and appropriate. | 1 | 2 | 3 | 4 | 5 |
| 5. The workshop added to my skills. | 1 | 2 | 3 | 4 | 5 |
| 6. I plan to use the techniques, skills, and information presented to help my child. | 1 | 2 | 3 | 4 | 5 |
| 7. I have more confidence in my skills to help my child as a result of this workshop. | 1 | 2 | 3 | 4 | 5 |

Comments: _____

Tool 4.8—Sample Flyer for Inviting Title I Parents to Participate in Guest Reading Program**Inviting All Title I Parents!****April Is Title I Month—Show Your Support
For Your Child’s Efforts and Have Some Fun 😊**

We are looking for parents to volunteer to be guest readers in the Title I classroom. You can do this by selecting a favorite book to read to your child’s Title I class. No classroom experience is required! Our students love to hear stories.

The book you read can be an old childhood favorite of yours or a new favorite of your child’s. Or it could be one that you and your child are reading for the Title I home reading contract. Also, your child’s Title I teacher can recommend a book that the class might enjoy.

If you would like to have this wonderful opportunity to read to the class while also getting an understanding of your child’s Title I experience, please fill in the section below and send it in with your child. Your child’s Title I teacher will call you to make arrangements.

Yes! I want to be a guest reader!

Book(s) I would like to read: _____

Child’s name: _____

Parent’s name: _____

Phone number: _____

A good time to call me: _____

Tool 4.9– Home Reading Contract Between a Title I Elementary School Child and a Parent, Guardian, or Other Family Member

**Title I Program
Home Reading Contract Between Book Buddies**

This is an agreement between _____(insert name of student)

and _____(insert name of Book Buddy).

We agree to become Book Buddies. We know that reading with someone is a good way to become a better reader.

We promise to read together every day for 15 minutes. We will read out loud to each other or silently to ourselves.

During silent reading, we may read our own reading materials, but we must agree to read.

We also promise to talk about what we have read together.

Student’s signature _____ Date _____

Book Buddy’s signature _____ Date _____

Directions:

1. Write in the dates for any given month.
2. Put a check mark also in a box for each day you and your Book Buddy read together for at least 15 minutes.
3. Return the completed calendar to your Title I teacher within three days of completion.

If you and your Book Buddy read together for a minimum of 20 days, you will receive a special certificate!

| | Sun. | Mon. | Tues. | Wed. | Thurs. | Fri. | Sat. |
|---------------|-------------|-------------|--------------|-------------|---------------|-------------|-------------|
| Week 1 | | | | | | | |
| Week 2 | | | | | | | |
| Week 3 | | | | | | | |
| Week 4 | | | | | | | |
| Week 5 | | | | | | | |

Tool 4.10–Tips for Parents to Promote Reading**Helping Your Child Develop Reading Skills****Choose the best books!**

Need help choosing books for your child? Contact the local public library or your child's school library and ask a librarian for help in order to choose books that are the most appropriate with respect to reading level and subject matter.

Create a love of reading!

With the rise in technology, children now have interactive gaming, television, computers and the Internet to occupy their free time. It's no wonder that children today have no time left for reading books.

As a parent, you can inspire your child to read. There are many things you can do to encourage your child and to help create a love of reading:

- Read aloud to your child;
- Take your child to the library;
- Obtain a library card for your child;
- Create a home library for your child
- Restrict TV, video games, and computer time;
- Provide opportunities for new experiences;
- Develop an awareness of printed language;
- Find reasons for your child to write, such as thank-you notes for parties and gifts or grocery lists to help you shop; and
- Be a good reading role model by reading in front of your child daily.

Tool 4.11A–Cover Sheet for Title I Student Progress Report to Parents and Guardians

Student Progress Report

Title I Program Operated at

_____ School

For [insert school year] school year

Date _____

To the parents or guardians of _____

This report is a review of the progress your child is making in the Title I program. Your child is currently being served in:

_____ Reading

_____ Mathematics

_____ Both reading and mathematics

Comments:

Title I Teacher

Enclosure(s)

Tool 4.11B—Sample Title I Student Progress Report for Reading

**Title I Program
Student Progress Report
Reading**

Student name _____ Grade _____ Year _____

Title I reading teacher _____

Reporting period (circle one): 1 2 3 4

Dear Parents,
Your child is attending a special reading class to increase his or her ability and confidence in reading, writing, and other language arts skills. While your child may not have reached grade level in all areas, he or she has demonstrated the following skills. (Note: If a skill is not checked, in any of the three columns, it is a skill that has not yet been taught).

| Reading Skills | Shows some progress | Shows satisfactory progress | Has mastered skill |
|--|---------------------|-----------------------------|--------------------|
| Identifies individual sounds in words | | | |
| Recognizes rhyming patterns | | | |
| Uses letter-sound relationship to figure out new words | | | |
| Recognizes by sight often-used words | | | |
| Decodes words not recognized | | | |
| Uses the content to identify words and their meanings | | | |
| Reads different books | | | |
| Identifies types of texts read | | | |
| Sets a purpose for reading | | | |
| Asks questions about what is read | | | |
| Recalls sequences of a story | | | |
| Comprehends what is read | | | |
| Summarizes what is read | | | |
| Knows parts of a fictional story | | | |
| Makes predictions about what is read | | | |
| Determines what is important about what was read | | | |

I would be very happy to discuss your child’s work with you. I am available [insert times and days]. I am also available by phone [insert phone number], if these times are not convenient for you.

_____ Date

Title I Teacher

_____ Date

Parent signature—I have read this report.

Tool 4.11C—Sample Title I Student Progress Report for Mathematics

Title I Program Student Progress Report Mathematics

Student name _____ Grade _____ Year _____

Title I mathematics teacher _____

Reporting period (circle one): 1 2 3 4

Dear Parents,
Your child is attending a special mathematics class to help increase his or her ability and confidence in mathematics. While your child may not have reached grade level in all areas, he or she has demonstrated the following skills. (Note: If a skill is not checked, in any of the three columns, it is a skill that has not yet been taught).

| Math Skills | Shows some progress | Shows satisfactory progress | Has mastered skill |
|--------------------------------------|---------------------|-----------------------------|--------------------|
| Understands number concepts | | | |
| Knows addition facts | | | |
| Knows multiplication facts | | | |
| Knows division facts | | | |
| Can add numbers | | | |
| Can subtract numbers | | | |
| Can multiply by a 1-digit multiplier | | | |
| Can multiply by a 2-digit multiplier | | | |
| Can divide by a 1-digit multiplier | | | |
| Can divide by a 2-digit multiplier | | | |
| Understands fraction concepts | | | |
| Can add and subtract fractions | | | |
| Understands decimal concepts | | | |
| Can add and subtract decimals | | | |
| Can relate fractions to decimals | | | |
| Can use measurements | | | |
| Understands and solves word problems | | | |

I would be very happy to discuss your child’s work with you. I am available [insert times and days.] I am also available by phone [insert phone number.] if these times are not convenient for you.

_____ Date

Title I Teacher

_____ Date

Parent signature—I have read this report.

Tool 4.12A–Memo to Accompany Title I Program Parent Survey

[Letterhead]

Memorandum**To:** Private School Teachers of Title I Students**From:** [Insert name], Title I Coordinator**Date:** [Insert date]**Subject:** Title I Program Parent Survey

Enclosed are parent survey forms for the Title I program. Thank you for your input and suggestions during the drafting stage. Please distribute these to your students who are Title I participants and ask that they give it to their parents. The parents should return the surveys to you as soon as possible, but **no later than [Insert date]**. If forms are returned to you later than this date, please accept them as well. However, any encouragement to have the forms returned as soon as possible will be appreciated. Please send returned forms to the school office each day.

Thank you for your help. The input from these surveys will help us to best meet the needs of your Title I participants.

Please contact me at [insert phone number] if you have any questions.

Tool 4.12B–Title I Program Parent Survey

Title I Program Parent Survey

[Insert school year]

To better serve the students of our school, we would like your opinion about your child's experience in the Title I program. Your time, comments, and suggestions are greatly appreciated!

1. My child attends _____ School.

2. My child is in grade _____ during the current school year.

3. My child receives Title I supplemental instruction in:

_____ Reading

_____ Mathematics

_____ Both reading and mathematics

4. The Title I program helped improve your child's skills in

Reading _____ Yes _____ No Mathematics _____ Yes _____ No

Comments _____

5. What does your child like about the Title I program? (Check all that apply)

_____ Getting more help with reading and/or mathematics

_____ Learning more easily because there are fewer students in the class

_____ Participating in a variety of activities

_____ Having time away from the regular classroom

_____ Other (Explain) _____

Comments _____

6. What does your child dislike about the Title I program? (Check all that apply)

_____ Having to do additional work

_____ Missing regular classroom work

_____ Leaving the classroom

_____ Other (Explain) _____

Comments _____

Tool 4.12B–Title I Program Parent Survey (continued)

7. In your opinion, what is the best feature of the Title I program?

- Extra support for improving reading, mathematics or both
 Single subject (reading or mathematics) focus
 Small group instruction

Recommended improvements _____

8. How did the Title I teacher keep you informed of your child's progress in the Title I program? (Check all that apply.)

- In-person conference(s)
 Telephone conversation(s)
 Progress report(s)
 Parent-teacher meeting (s) at school
 Other written communication (notes, letters, comments on student work)
 I was not informed.

Comments _____

9. Which of these strategies would you use to help your child practice reading, mathematics, or both at home? (Check all that apply.)

- Take home books from school
 Take home video cassettes with activity books
 Take home activities to do on a computer
 Attend parent involvement meetings or workshops at school
 Volunteer in the Title I program to observe the Title I teacher's methods

Comments _____

10. When would you most likely be able to attend a parent-teacher meeting at school? (The times below are approximate and would coincide with the school schedule.)

- At the beginning of the school day
 Around lunchtime
 In the afternoon, before the end of the school day
 In the afternoon, at the end of the school day
 Early evening
 Weekend

Comments _____

Please return this survey to your child's classroom teacher as soon as possible, but no later than [insert date]. Thank you for helping us to improve the next year's Title I program.

Tool 4.12C–Title I Program Parent Short Survey

[Letterhead]

[Insert date]

Dear Parent/Guardian:

We would like your comments on the Title I program in your child’s school. When you have completed this form, simply seal it in the envelope provided and return it to your child’s Title I teacher by [insert date]. Thank you!

[Insert signature] Title I teacher

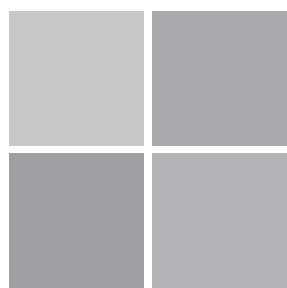
**Title I Program
Parent Survey
[Insert school year]**

School my child attends: _____ Grade: _____

Directions: Please circle one answer for each statement below.

| | Strongly Agree | Agree | Disagree | Strongly Disagree |
|---|-----------------------|--------------|-----------------|--------------------------|
| 1. The Title I program has helped my child gain confidence. | Strongly Agree | Agree | Disagree | Strongly Disagree |
| 2. I was given information on my child’s progress. | Strongly Agree | Agree | Disagree | Strongly Disagree |
| 3. My child is doing better in reading since attending the Title I program. | Strongly Agree | Agree | Disagree | Strongly Disagree |
| 4. My child is doing better in math since attending the Title I program. | Strongly Agree | Agree | Disagree | Strongly Disagree |
| 5. My child enjoyed participating in the Title I program. | Strongly Agree | Agree | Disagree | Strongly Disagree |
| 6. Overall I was satisfied with the Title I program. | Strongly Agree | Agree | Disagree | Strongly Disagree |

Please share any comments you may have about the Title I program for your child.



Standards, Assessments, And Program Modification

Sec. 1120(b)(1)(D) of Title I requires that LEA officials consult with private school officials on how Title I services will be academically assessed annually and how the results of that assessment will be used to improve services. Under Title I, public school students who participate in Title I programs must be held to the same challenging state content and student achievement standards that is expected of all public school students. Private school students who participate in Title I should be held also to the same high standards.

Standards and Assessments

During the consultation process, public and private school officials must discuss what standards will be used to measure the effectiveness of the Title I programs as indicated by the achievement of the private school participants. If LEA officials, in consultation with the private school officials, determine that it would be inappropriate to measure program effectiveness and student achievement in relation to the state's standards, the LEA must use alternative standards that reasonably promise that the services provided will enable the private school participants to achieve the same high level called for by the state student achievement measures. It may be more appropriate for the standards to be aligned with the curriculum of the private school and it may be necessary to use different standards for different private schools given the curricula of the private schools differ from one another. The LEA may use the state's assessment system or other assessment measures that more accurately reflect the curriculum of the private school.

During the consultation process, public and private school officials also must discuss what assessments will be used to measure the effectiveness of the Title I program and the achievement of the Title I participants against the agreed-upon standards. All students receiving Title I services, including students receiving noninstructional type services, such as counseling, are assessed on their progress in meeting these agreed-upon standards each year. At a minimum, achievement in mathematics and/or reading and language arts must be assessed. (For those receiving noninstructional services, this is used to determine if counseling, for example, improved academic achievement.) The LEA officials have the authority to make the final decision on what assessments will be used. An appropriate assessment may be the one already in use at the private school.

The Title I program also must be assessed. The assessment should evaluate the effectiveness of the program against the agreed-upon standards, as discussed in consultation, so that the public and private school officials can determine if the needs of the private school participants have been met, gaps in knowledge have been closed, and achievement in the regular private school classroom has improved. This information also should be used to plan an effective Title I program for the next school year.

It should be noted that the LEA officials, after consultation with private school officials, determine the standards and assessments for the Title I program provided to private school children. SEA officials cannot impose standards, achievement levels, or assessments on an LEA program for private school students. The LEA officials determine these through

timely and meaningful consultation with the appropriate private school officials.

Annual Progress and Program Modification

Every year, the LEA officials and the private school officials must consult on what constitutes progress for the Title I program. If the private school participants in the Title I program do not make the expected annual progress, the LEA officials must make modifications annually to the Title I program, in consultation with private school officials. The LEA may make modifications more often, if needed. In addition, the assessment data will assist the public and private school officials in determining the professional development needs of the private schools teachers who teach participating Title I participants and determining the most appropriate activities for their parents.

An Example of Consultation on Standards, Assessment, and Modifications: In consultation, public and private school officials have agreed upon a standard that will determine whether or not the Title I program for private school students is successful. Further, they have agreed upon an assessment that will be administered by the LEA to measure achievement of the Title I participants against these standards.

Both parties also have agreed that the Title I program will be successful if at least 80 percent of the students achieve a proficient or better score on the agreed-upon reading assessment. However, if less than 80 percent receive a proficient or better score, public and private school officials agree that the program design needs to be reconsidered and modifications made, if appropriate.

Public and private school officials review the assessment results together and, based on the percentage of students scoring at the proficient level or higher, determine the next steps to improve the program or to ensure the program's continued success.

Selected Practices and Tools

■ Determining the Assessment Instrument for Annual Progress

The Title I program for private school children must be assessed annually by means of either the state assessment or an appropriate assessment instrument as determined in consultation between the LEA and private school officials.

Tool 5.1—Sample Reading Achievement Chart Used to Make Modification Decisions

This tool shows an LEA chart listing assessments instruments by grade levels and the annual progress goals developed during the consultation process that private school participants must make in order to be considered proficient. This chart models how to use data to make modification decisions.

■ Summary Form of Assessment Data

It is important for the LEA officials to present the assessment data on private school Title I students in a manner that is clearly understood by private school officials, private school classroom teachers, and families.

Tool 5.2—Sample Title I Assessment Data Summary Chart With Analysis

This tool shows assessment data presented in a chart. In addition to the chart, the LEA can provide the private school officials with interpretations of the assessment scores listed. The public and private school officials determined the reading proficiency levels listed in the chart during prior consultation. Thus, these levels may differ for each private school with Title I participants.

■ Program Modifications

The results of the assessment should be the primary resource used to plan the following school year's instructional, professional development, and parent involvement programs. Therefore, the results of the assessments should be available to the private school officials in a timely manner, before the Title I program for the following school year is finalized. Once the results of the assessment are available, public and private school officials should meet to review the assessment results to determine whether there is a need to make program modifications and other improvements in the next school year. In addition to reviewing the overall percentage of students failing, passing with proficient scores, and passing with advanced scores, the public and private school officials should review the skill sets and the achievement of participating students within these sets. Lack of significant student achievement may indicate a need to redesign the entire program, improve particular program elements, or strengthen professional development and parent involvement activities.

Tool: 5.3—Sample Program Modifications Based on Grade 2 Assessments

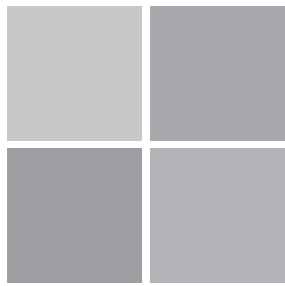
This example demonstrates how an LEA officials, in consultation with private school officials make program modifications for reading and mathematics instruction, professional development, and parent involvement activities using assessment data to determine student needs and program goals.

■ Evaluation Plan

LEA officials may develop an annual evaluation plan that lists by private school or groups of private school the standards and assessments agreed upon in consultation that will be used to measure the effectiveness of the program and the achievement of the participants.

Tool 5.4—Sample LEA Procedures for Using Title I Assessment Information to Develop a Program Evaluation Plan That Includes Annual Progress and Program Modifications

This form provides information on the assessment instrument, the student performance level, the annual progress measure, and the percentage of students achieving the annual progress measure by the end of the school year. In addition, the LEA lists the strategies it will use to improve the Title I program if annual progress is not met.



Tools

Tool 5.1–Sample Reading Chart Used to Make Modification Decisions

Sample Reading Achievement Chart for Title I K–6 Students and Subsequent Program Modification Discussions

LEA Chart of the Instruments, Annual Progress Reading Goals, and Percentage of Title I Students Achieving Goals by Grade Level

| Reading Achievement of Title I Students | | | |
|---|--|--|--|
| Grade Level(s) | Instruments* | Annual Progress Reading Goals* | Percentage of Title I Students Achieving Reading Goals |
| Kindergarten | Kindergarten checklist | 100% will master each item on the checklist. | 92 |
| Grades 1–2 | Publisher’s test from private school reading series | 100% will read at grade level. | 75 |
| Grades 3–6 | Standardized test taken by all private school students | 100% will score at the 60th percentile or above. | 70 |

*Note that the instruments used and annual progress goals for student reading achievement were determined in consultation between public and private school officials.

Using This Chart to Make Decisions on Modifications to the Title I Program

The percentage of children achieving the annual progress goals necessitates the public and private school officials to ask: Is the percentage of Title I students achieving the annual progress goals acceptable?

- In kindergarten, 92 percent of the students master every item on the checklist. What strategies did the LEA use to achieve this goal? What additional approaches should the LEA use for the 8 percent of the students who did not make the goal?
- In grades 1–2, 25 percent of the students are not at grade level in reading. Should the LEA modify the Title I program or should the LEA continue the program with no changes?
- In grades 3–6, almost one-third of the students (30 percent) scored below the 60th percentile. Should the LEA modify the Title I program or should the LEA continue the program with no changes?

Tool 5.2– Title I Assessment Data Summary With Analysis**Sample Title I Assessment Data Summary Chart With Analysis**

This summary chart presents four years of assessment data for Title I programs serving private school children. The proficiency levels listed are directly tied to grade-level standards that all participating children are expected to meet. These results are used each year by public and private school officials to improve the Title I program of instruction and to plan professional development and parental involvement activities.

This type of assessment data summary chart and its analysis is critical to future planning and should be updated on an annual basis and examined during the consultation process about the subsequent year’s Title I program.

| Four-year Title I Assessment Data Summary: Percentage of Participating Private School Students At Each Proficiency Level, by School Year | | | | |
|---|--------------------|--------------|--------------|--------------|
| Reading Proficiency Levels for Grade 2 | School Year | | | |
| | 02–03 | 03–04 | 04–05 | 05–06 |
| Fail | 23% | 15% | 11% | 9% |
| Pass—Proficient | 53% | 62% | 32% | 22% |
| Pass—Advanced | 24% | 23% | 57% | 69% |

Academic achievement standards for each grade and content area combination must include at least three achievement levels, which the LEA may label “proficient,” “advanced,” and “basic.” Of these levels, proficient and advanced must represent high achievement and basic must represent achievement that is not yet proficient. These labels may vary depending on decisions made in consultation. In addition to these levels, the LEA’s academic achievement standards must include descriptions of the content-based competencies associated with each level. The LEA officials, in consultation with private school officials, should determine which specific scores on the LEA assessments distinguish one level from another.

Analysis of Title I assessment data summary:

- Most children received a passing score, either pass-proficient or pass-advanced, in all four years;
- The percentage of children receiving passing scores increased from 76 percent in first year to 91 percent in fourth year.
- The percentage of children failing to meet the annual progress goals has steadily decreased over the past four years.
- The percentage of children achieving pass-advanced scores has dramatically increased (188 percent) over the past four years.

Public and private school officials should examine the Title I program to determine the strategies and approaches that the LEA used to have the Title I students achieve these results.

Tool: 5.3—Sample Program Modifications Based on Grade 2 Assessments

Sample Chart of Title I Program Modifications for Grade 2 Reading and Math

| Title I Program, Grade 2: Using Assessment Results to Modify Instruction, Professional Development, and Parent Involvement | | | | | |
|---|--|--|---|---|--|
| READING | | | | | |
| Student Needs | Program Goals | Program Assessment Results | Modifications to Instructional Program | Modifications to Professional Development | Modifications to Parental Involvement |
| Phonetic awareness | Students will recognize and pronounce all phonetic sounds and blends. | 85 percent of the students assessed met this standard. | Retain phonetic elements in the instructional program. | Review of strategies for teaching phonics to at-risk students | Provide additional phonics review for parents. |
| Reading in the content areas | Students will read and understand grade-level passages in science and social studies. | 42 percent of the students assessed met this standard. | Add content area vocabulary to daily curriculum in reading. Provide increased opportunities for reading in content areas. | Reading instruction in the content area for at-risk students | Provide sample reading passages or books to parents to read with students at home. |
| MATHEMATICS | | | | | |
| Student Needs | Program Goals | Program Assessment Results | Modifications to Instructional Program | Modifications to Professional Development | Modifications to Parental Involvement |
| Application of appropriate math functions to everyday problems | Students will correctly choose the appropriate math function when working grade-level word problems. | 54 percent of the students assessed met this standard. | Place increased emphasis on work problems in each math instructional module. | Math applications for at-risk students | Conduct Make-it take-it Workshop to construct word puzzles for parents to work on with students at home. |

Tool 5.4—Sample LEA Procedures for Using Title I Assessment Information to Develop a Program Evaluation Plan That Includes Annual Progress and Program Modifications**Sample: LEA Procedures for Using Title I Assessment Information to Develop a Program Evaluation Plan and Subsequent Program Modifications****Title I Program Assessment**

- After the assessment and analysis of the appropriate data, priorities will be established that meet the needs of students.
- A program model and schedule will be aligned with the established priorities.
- An instructional program will be designed to **supplement** the private school’s core curriculum.
- The private school uses _____ reading materials for the core curriculum.
- The private school uses _____ mathematics materials for the core curriculum.

Evaluation Plan

- LEA officials must assess annually the progress of the Title I program toward enabling private school participants to meet the agreed-upon standards. Student performance results will be reviewed annually. When the standardized test information is available, the Title I teacher(s) and the private school official(s) will meet to analyze the assessment results for the participating students. Their goal is to determine whether or not the level of student performance, as measured by the standardized test, has met or exceeded the desired outcomes agreed to in consultation.
- Based on consultation, the effectiveness of the Title I program at each private school will be measured through comparing the targeted percentage of students reaching the established performance-level standard and the agreed-upon year-end percentage of students achieving the performance level.
- In the event the Title I program fails to meet the annual progress target, consultation will occur to examine the student performance data to determine whether modifications are required.

Tool 5.4–Sample LEA Procedures for Using Title I Assessment Information to Develop a Program Evaluation Plan That Includes Annual Progress and Program Modifications (continued)

Sample: LEA Procedures for Using Title I Assessment Information to Develop a Program Evaluation Plan and Subsequent Program Modifications (continued)

Determining Annual Progress Measure

Agreed-upon performance levels (standards) used to determine the annual progress of the Title I program at the private school are:

Reading/Language Arts

| Instrument | Student Performance Level | Annual Progress Measure (Percentage of students achieving performance level) | Year-end Percentage Achieving |
|-------------------|----------------------------------|---|--------------------------------------|
| Gr. K–2: _____ | _____ | _____ | _____ |
| Gr. 3–12: _____ | _____ | _____ | _____ |

Mathematics

| Instrument | Student Performance Level | Annual Progress Measure (Percentage of students achieving performance level) | Year-end Percentage Achieving |
|-------------------|----------------------------------|---|--------------------------------------|
| Gr. K–2: _____ | _____ | _____ | _____ |
| Gr. 3–12: _____ | _____ | _____ | _____ |

Program Modifications

- If the program fails to meet the annual progress target, consultation will occur to examine the student performance data to determine needed modifications. To improve student achievement, the modifications will include, but will not be limited to:
 - Increased Title I teacher time;
 - Implementation of Title I services for extended day or extended year, or both;
 - Increased focus or time or both for specific grade level(s), if a need is demonstrated; and
 - Evaluation of supplemental materials for effectiveness in improving student academic achievement.

- Also, the consultation process will include a review of the performance standards for program evaluation in the following year.

- The standards and progress measures will be modified, as necessary.



Appendix A:

Section 1120 of Title I

As Reauthorized by the

No Child Left Behind Act of 2001

Sec. 1120.

Participation of Children

Enrolled in Private Schools.

(a) GENERAL REQUIREMENT—

(1) IN GENERAL—To the extent consistent with the number of eligible children identified under section 1115(b) in the school district served by a local educational agency who are enrolled in private elementary schools and secondary schools, a local educational agency shall, after timely and meaningful consultation with appropriate private school officials, provide such children, on an equitable basis, special educational services or other benefits under this part (such as dual enrollment, educational radio and television, computer equipment and materials, other technology, and mobile educational services and equipment) that address their needs, and shall ensure that teachers and families of the children participate, on an equitable basis, in services and activities developed pursuant to sections 1118 and 1119.

(2) SECULAR, NEUTRAL, NONIDEOLOGICAL—Such educational services or other benefits, including materials and equipment, shall be secular, neutral, and nonideological.

(3) EQUITY—Educational services and other benefits for such private school children shall be equitable in comparison to services and other benefits for public school children participating under this part, and shall be provided in a timely manner.

(4) EXPENDITURES—Expenditures for educational services and other benefits to eligible private school children shall be equal to the proportion of funds allocated to participating school attendance areas based on the number of children from low-income families who attend private schools, which the local educational agency may determine each year or every 2 years.

(5) PROVISION OF SERVICES—The local educational agency may provide services under this section directly or through contracts with public and private agencies, organizations, and institutions.

(b) CONSULTATION—

(1) IN GENERAL—To ensure timely and meaningful consultation, a local educational agency shall consult with appropriate private school officials during the design and development of such agency's programs under this part, on issues such as —

(A) how the children's needs will be identified;

(B) what services will be offered;

(C) how, where, and by whom the services will be provided;

(D) how the services will be academically assessed and how the results of that assessment will be used to improve those services;

(E) the size and scope of the equitable services to be provided to the eligible private school children, and the proportion of funds that is

allocated under subsection (a)(4) for such services;

(F) the method or sources of data that are used under subsection (c) and section 1113(c)(1) to determine the number of children from low-income families in participating school attendance areas who attend private schools;

(G) how and when the agency will make decisions about the delivery of services to such children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with potential third-party providers; and

(H) how, if the agency disagrees with the views of the private school officials on the provision of services through a contract, the local educational agency will provide in writing to such private school officials an analysis of the reasons why the local educational agency has chosen not to use a contractor.

(2) **TIMING**—Such consultation shall include meetings of agency and private school officials and shall occur before the local educational agency makes any decision that affects the opportunities of eligible private school children to participate in programs under this part. Such meetings shall continue throughout implementation and assessment of services provided under this section.

(3) **DISCUSSION**—Such consultation shall include a discussion of service delivery mechanisms a local educational agency can use to provide equitable services to eligible private school children.

(4) **DOCUMENTATION**—Each local educational agency shall maintain in the agency's records and provide to the State educational agency involved a written affirmation signed by officials

of each participating private school that the consultation required by this section has occurred. If such officials do not provide such affirmation within a reasonable period of time, the local educational agency shall forward the documentation that such consultation has taken place to the State educational agency.

(5) **COMPLIANCE**—

(A) **IN GENERAL**—A private school official shall have the right to complain to the State educational agency that the local educational agency did not engage in consultation that was meaningful and timely, or did not give due consideration to the views of the private school official.

(B) **PROCEDURE**—If the private school official wishes to complain, the official shall provide the basis of the noncompliance with this section by the local educational agency to the State educational agency, and the local educational agency shall forward the appropriate documentation to the State educational agency.

(c) **ALLOCATION FOR EQUITABLE SERVICE TO PRIVATE SCHOOL STUDENTS**—

(1) **CALCULATION**—A local educational agency shall have the final authority, consistent with this section, to calculate the number of children, ages 5 through 17, who are from low-income families and attend private schools by —

(A) using the same measure of low income used to count public school children;

(B) using the results of a survey that, to the extent possible, protects the identity of families of private school students, and allowing such survey results to be extrapolated if complete actual data are unavailable;

(C) applying the low-income percentage of each participating public school attendance area, determined pursuant to this section, to the number of private school children who reside in that school attendance area; or

(D) using an equated measure of low income correlated with the measure of low income used to count public school children.

(2) COMPLAINT PROCESS—Any dispute regarding low-income data for private school students shall be subject to the complaint process authorized in section 9505.

(d) PUBLIC CONTROL OF FUNDS—

(1) IN GENERAL—The control of funds provided under this part, and title to materials, equipment, and property purchased with such funds, shall be in a public agency, and a public agency shall administer such funds, materials, equipment, and property.

(2) PROVISION OF SERVICES—

(A) PROVIDER—The provision of services under this section shall be provided—

(i) by employees of a public agency; or

(ii) through contract by such public agency with an individual, association, agency, or organization.

(B) REQUIREMENT—In the provision of such services, such employee, individual, association, agency, or organization shall be independent of such private school and of any religious organization, and such employment or contract shall be under the control and supervision of such public agency.

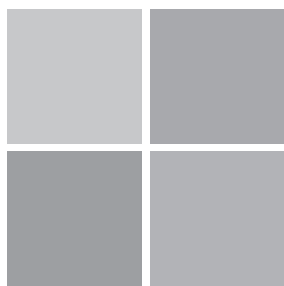
(e) STANDARDS FOR A BYPASS—If a local educational agency is prohibited by law from providing

for the participation in programs on an equitable basis of eligible children enrolled in private elementary schools and secondary schools, or if the Secretary determines that a local educational agency has substantially failed or is unwilling, to provide for such participation, as required by this section, the Secretary shall—

(1) waive the requirements of this section for such local educational agency;

(2) arrange for the provision of services to such children through arrangements that shall be subject to the requirements of this section and sections 9503 and 9504; and

(3) in making the determination under this subsection, consider one or more factors, including the quality, size, scope, and location of the program and the opportunity of eligible children to participate.



Appendix B:

Department of Education, 34 *CFR* Part 200 Title I—Improving the Academic Achievement of the Disadvantaged

Office of Elementary and Secondary Education

Final Regulations: Dec. 2, 2002 (Vol. 67, No. 231)

Participation of Eligible Children in Private Schools

Sec. 200.62 Responsibilities for providing services to private school children

(a) After timely and meaningful consultation with appropriate officials of private schools, an LEA must--

(1) In accordance with §§200.62 through 200.67 and section 1120 of the ESEA, provide special educational services or other benefits under subpart A of this part, on an equitable basis and in a timely manner, to eligible children who are enrolled in private elementary and secondary schools; and

(2) Ensure that teachers and families of participating private school children participate on a basis equitable to the participation of teachers and families of public school children receiving these services in accordance with §200.65.

(b)(1) Eligible private school children are children who--

(i) Reside in participating public school attendance areas of the LEA, regardless of whether the private school they attend is located in the LEA; and

(ii) Meet the criteria in section 1115(b) of the ESEA.

(2) Among the eligible private school children, the LEA must select children to participate, consistent with §200.64.

(c) The services and other benefits an LEA provides under this section must be secular, neutral and nonideological.

Sec. 200.63 Consultation.

(a) In order to have timely and meaningful consultation, an LEA must consult with appropriate officials of private schools during the design and

development of the LEA's program for eligible private school children.

(b) At a minimum, the LEA must consult on the following:

(1) How the LEA will identify the needs of eligible private school children.

(2) What services the LEA will offer to eligible private school children.

(3) How and when the LEA will make decisions about the delivery of services.

(4) How, where, and by whom the LEA will provide services to eligible private school children.

(5) How the LEA will assess academically the services to eligible private school children in accordance with § 200.10, and how the LEA will use the results of that assessment to improve Title I services.

(6) The size and scope of the equitable services that the LEA will provide to eligible private school children, and, consistent with §200.64, the proportion of funds that the LEA will allocate for these services.

(7) The method or sources of data that the LEA will use under §200.78 to determine the number of private school children from low-income families residing in participating public school attendance areas, including whether the LEA will extrapolate data if a survey is used.

(8) The equitable services the LEA will provide to teachers and families of participating private school children.

(c)(1) Consultation by the LEA must--

(i) Include meetings of the LEA and appropriate officials of the private schools; and

(ii) Occur before the LEA makes any decision that affects the opportunity of eligible private school children to participate in Title I programs.

(2) The LEA must meet with officials of the private schools throughout the implementation and assessment of the Title I services.

(d)(1) Consultation must include--

(i) A discussion of service delivery mechanisms the LEA can use to provide equitable services to eligible private school children; and

(ii) A thorough consideration and analysis of the views of the officials of the private schools on the provision of services through a contract with a third-party provider.

(2) If the LEA disagrees with the views of the officials of the private schools on the provision of services through a contract, the LEA must provide in writing to the officials of the private schools the reasons why the LEA chooses not to use a contractor.

(e)(1) The LEA must maintain in its records and provide to the SEA a written affirmation, signed by officials of each private school with participating children or appropriate private school representatives, that the required consultation has occurred.

(2) If the officials of the private schools do not provide the affirmations within a reasonable period of time, the LEA must submit to the SEA documentation that the required consultation occurred.

(f) An official of a private school has the right to complain to the SEA that the LEA did not--

(1) Engage in timely and meaningful consultation; or

(2) Consider the views of the official of the private school.

Sec. 200.64 Factors for determining equitable participation of private school children.

(a) Equal expenditures. (1) Funds expended by an LEA under subpart A of this part for services for eligible private school children in the aggregate must be equal to the amount of funds generated by private school children from low-income families under paragraph (a)(2) of this section.

(2) An LEA must meet this requirement as follows:

(i)(A) If the LEA reserves funds under §200.77 to provide instructional and related activities for public elementary or secondary school students at the district level, the LEA must also provide from those

funds, as applicable, equitable services to eligible private school children.

(B) The amount of funds available to provide equitable services from the applicable reserved funds must be proportionate to the number of private school children from low-income families residing in participating public school attendance areas.

(ii) The LEA must reserve the funds generated by private school children under § 200.78 and, in consultation with appropriate officials of the private schools, may--

(A) Combine those amounts, along with funds under paragraph (a)(2)(i) of this section, if appropriate, to create a pool of funds from which the LEA provides equitable services to eligible private school children, in the aggregate, in greatest need of those services; or

(B) Provide equitable services to eligible children in each private school with the funds generated by children from low-income families under §200.78 who attend that private school.

(b) Services on an equitable basis. (1) The services that an LEA provides to eligible private school children must be equitable in comparison to the services and other benefits that the LEA provides to public school children participating under subpart A of this part.

(2) Services are equitable if the LEA--

(i) Addresses and assesses the specific needs and educational progress of eligible private school children on a comparable basis as public school children;

(ii) Meets the equal expenditure requirements under paragraph (a) of section; and

(iii) Provides private school children with an opportunity to participate that--

(A) Is equitable to the opportunity provided to public school children; and

(B) Provides reasonable promise of the private school children achieving the high levels called for by the State's student academic achievement standards or equivalent standards applicable to the private school children.

(3)(i) The LEA may provide services to eligible private school children either directly or through arrangements with another LEA or a third-party provider.

(ii) If the LEA contracts with a third-party provider--

(A) The provider must be independent of the private school and of any religious organization; and

(B) The contract must be under the control and supervision of the LEA.

(4) After timely and meaningful consultation under §200.63, the LEA must make the final decisions with respect to the services it will provide to eligible private school children.

Sec. 200.65 Determining equitable participation of teachers and families of participating private school children.

(a)(1) From applicable funds reserved for parent involvement and professional development under §200.77, an LEA shall ensure that teachers and families of participating private school children participate on an equitable basis in professional development and parent involvement activities, respectively.

(2) The amount of funds available to provide equitable services from the applicable reserved funds must be proportionate to the number of private school children from low-income families residing in participating public school attendance areas.

(b) After consultation with appropriate officials of the private schools, the LEA must conduct professional development and parent involvement activities for the teachers and families of participating private school children either--

(1) In conjunction with the LEA's professional development and parent involvement activities; or

(2) Independently.

(c) Private school teachers are not covered by the requirements in §200.56.

Sec. 200.66 Requirements to ensure that funds do not benefit a private school.

(a) An LEA must use funds under subpart A of this part to provide services that supplement, and

in no case supplant, the services that would, in the absence of Title I services, be available to participating private school children.

(b)(1) The LEA must use funds under subpart A of this part to meet the special educational needs of participating private school children.

(2) The LEA may not use funds under subpart A of this part for--

(i) The needs of the private school; or

(ii) The general needs of children in the private school.

Sec. 200.67 Requirements concerning property, equipment, and supplies for the benefit of private school children.

(a) The LEA must keep title to and exercise continuing administrative control of all property, equipment, and supplies that the LEA acquires with funds under subpart A of this part for the benefit of eligible private school children.

(b) The LEA may place equipment and supplies in a private school for the period of time needed for the program.

(c) The LEA must ensure that the equipment and supplies placed in a private school--

(1) Are used only for Title I purposes; and

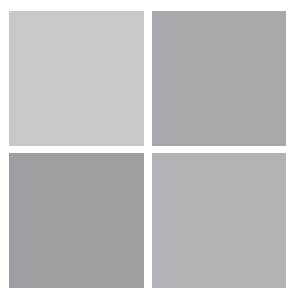
(2) Can be removed from the private school without remodeling the private school facility.

(d) The LEA must remove equipment and supplies from a private school if--

(1) The LEA no longer needs the equipment and supplies to provide Title I services; or

(2) Removal is necessary to avoid unauthorized use of the equipment or supplies for other than Title I purposes.

(e) The LEA may not use funds under subpart A of this part for repairs, minor remodeling, or construction of private school facilities.



Appendix C: Additional Resources

Title I Services to Eligible Private School Students Guidance
www.ed.gov/programs/titleiparta/psguidance.doc

**Code of Federal Regulations (CFR), Title 34, Part 200, Title I,
Improving the Academic Achievement of the Disadvantaged**
www.ed.gov/legislation/FedRegister/finrule/2003-4/120903a.html

**The Elementary and Secondary Education Act
as reauthorized by the No Child Left Behind Act of 2001**
<http://ed.gov/policy/elsec/leg/esea02>

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Student Achievement and School Accountability Programs
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