Providing Services to Eligible Private School Students

Title I Technical Assistance Session

May 15, 2013
Key concepts

Basic Premises:

- Services must be equitable to those provided to public school children

- Services must be developed in consultation with private school officials (timely and meaningful)
Find your students

★ Obtain record of resident student school attendance (district office):

• Annual resident census compared to list of enrollment, plus private school reports (M.G.L. Ch. 72, sec. 2)
• “Individual Non-Public School Report” submitted in Nov.
• “School Attending Children” report submitted in March

★ List students and their schools (even if out of district)
Communication

★ Offers of consultation (letters) to private schools:

• Send letters to private school officials (see sample letter handout)
• Maintain record of letters sent and obtain responses (affirmative or negative)
• Send letters that require signature of receipt (return receipt)
• Do follow-up by phone and keep records
Determine funds generated

★ **Count number of low-income students at each school:**
  - “Individual Non-Public School Report” submitted to DESE
  - Same source or comparable data (FRPL eligibility)
  - Extrapolation from a representative sample
  - Correlation of sources of data
  - Application of percentages at district-served school to private school children in attendance area

★ **Multiply number of low-income students by per-pupil expenditure (of Title I public school would have attended)**
Timely and meaningful consultation

• Should take place during design and development of your district program
• A limited offer to participate in your district’s existing program is not sufficient
• Issues to address (see “Affirmation of Consultation”):
  – Identification of children’s needs
  – What services will be offered
  – How, where, and by whom services will be offered
  – Types of assessment to be used and how they will be used to evaluate and improve services
Documentation

- Keep records of offers for consultation (return receipt)
- Keep records of low-income count for each participating school
- Obtain “written affirmation” that consultation has occurred, signed by officials of each participating private school (“Affirmation of Consultation” form that is part of application submission)
- If there is disagreement over use of third-party provider, provide written explanation of reasons behind your decision (see Title I website for specific guidance on third-party contract requirements)
Affirmation of consultation with (participating) private school officials

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

- How the district will identify the needs of eligible private school children.
- What services the district will offer to eligible private school children.
- How and when the district will make decisions about the delivery of services.
- How, where and by whom the district 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 district will assess academically the services to eligible private school children and how the district will use the results of that assessment to improve Title I services.
- The size and scope of the equitable services that the district will provide to eligible private school children and the proportion of funds that will be allocated to provide these services.
- The method or sources of data that the district will use to determine the number of private school children from low income families residing in participating public school attendance areas, including whether the district will extrapolate data, if a survey is used.
- The equitable services the district will provide to teachers and families of participating private school children.
- If the district disagrees with the views of the private school officials on the provisions of services through a contract, the district must provide the private schools the reasons in writing why the district 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.

<table>
<thead>
<tr>
<th>Public School Official</th>
<th>Date</th>
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</table>

<table>
<thead>
<tr>
<th>Private School Official</th>
<th>Date</th>
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<tbody>
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</tr>
</tbody>
</table>

Name of Public School District

Name of Private School
Program development

★ Equitable supplementary services
  - Allocation determined by per pupil allocations of participating schools
  - Services are not necessarily the same as the public schools’ (in size, content, and grades served)

★ Components
  - Needs assessment
  - Academic services
  - Assessment of progress
  - Parental involvement activities
  - Professional development opportunities
  - Evaluation
Special considerations

★ Secular, Neutral, Non-ideological

- Applies to teaching space and materials used – see federal guidance on Agostini v. Felton
  (http://www.ed.gov/programs/titleiparta/pvtschbenefits.doc)

★ Control of funds and contracts - must be maintained by public district at all times

- All property purchased is owned by public school district’s Title I program – label property and maintain inventory
- All personnel employed are to be contracted by the public school district
Supervisory responsibilities

- Adherence to all Title I regulations
- Coordination with regular classroom instruction
- Label and inventory Title I materials
- See that progress is being measured
- Use assessment of student progress to modify and strengthen program (part of your program evaluation)
- Adherence to the findings of Agostini v. Felton
School funding worksheet (formerly Form 1)

<table>
<thead>
<tr>
<th>School Name</th>
<th>School Code</th>
<th>Grades Served</th>
<th>Program Type</th>
<th>Total # of Children Enrolled in Schools in Column 1</th>
<th>Total (Attendance area count)</th>
<th>From Low-Income Families</th>
<th>Enter Public</th>
<th>Enter Non-Public</th>
<th>Enter Total</th>
<th>Enter Allocation for Each Title I School</th>
<th>Enter Additional Amounts for Supports &amp; Interventions in Level 2 Title I Schools</th>
<th>Per Pupil Amount (Column 10)</th>
<th>Portion of Column 10 Available for Non-Public School Service (Column 7x11)</th>
<th>Portion of Family Engagement Resonation for Non-Public Schools</th>
<th>Portion of Professional Development Reservation for Non-Public Schools</th>
<th>Accountability Information</th>
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<tbody>
<tr>
<td>Maple</td>
<td>01111111</td>
<td>K - 08</td>
<td>SW</td>
<td>1,230</td>
<td>928</td>
<td>24</td>
<td>946</td>
<td>75.0%</td>
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<td></td>
<td></td>
<td></td>
<td>ESMS</td>
<td>Level 1</td>
<td></td>
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<tr>
<td>Elm</td>
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<td>K - 08</td>
<td>SW</td>
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<td>0</td>
<td>634</td>
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<td>HS</td>
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<td></td>
<td>EES</td>
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Click here to add additional rows

6,606 0 3,976 59 4,035 $0 $200,000 $0 $0 $0
Non-public school participation worksheet

<table>
<thead>
<tr>
<th>Non-Public Schools Serving Eligible Children Residing in District</th>
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<tbody>
<tr>
<td>Grades Served</td>
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<tr>
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1. How many students enrolled in the participating schools listed above would have attended a Title I served school in your district had they attended public school?

2. How many of those students are considered low income and thus generated Title I funds for non-public school services?

3. How was low income status determined for non-public school students?

4. What is the total amount of funds generated for Title I services for eligible children attending the participating private schools? (See XXX instructions...)

5. What Title I services will be provided to participating non-public school students, their teachers, and their parents?

6. How will the district assess the impact of services it delivers to non-public schools?

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**TITLE II-A NON-PUBLIC SCHOOL PARTICIPATION WORKSHEET**

The Title I, Part A legislation states that districts must set aside Title II, Part A funds for professional development services for private school educators even if the district decides not to use any of the funds.
http://www.doe.mass.edu/apa/titlei/parta/pss

<table>
<thead>
<tr>
<th>Title I / Federal Support Programs Headlines</th>
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<td>03/28/13</td>
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</table>

**Non-Public School Services**

- [ ] Briefly State Questions
- [ ] Sample offer of consultation to eligible non-public schools & affirmation of consultation with participation non-public school officials
- [ ] Five Steps: Providing Title I Services to Eligible Private School Children
- [ ] Federal Non-Regulatory Guidance on Equitable Services to Eligible Private School Students, Teachers, & Other Educational Personnel

- [ ] Ensuring Equitable Services to Private School Children Tool Kit
- [ ] ESE Guidance on Generating Funds for Services to Eligible Private School Children
- [ ] Providing Services to Eligible Private School Students (PowerPoint from May 23, 2011 Title I Technical Assistance Session)
- [ ] Requirements for Third Party Provider Contracts for the Delivery of Title I Services to Private Schools

This page is maintained by [Title I DOE](http://www.doe.mass.edu/apa/titlei/parta/pss)
FIVE STEPS: PROVIDING TITLE I SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Step 1 – Locate Your Fund-Generating Students
- Obtain a list of district students who are attending private schools who would have attended a school that has a Title I program.
- Obtain confidential family income information to determine how many of these students generated Title I funds (see guidance and other resources at: http://www.doe.mass.edu/titlei/students/section=private)

Step 2 – Contact Appropriate Private School Officials
- Inform private school officials at schools where students from your district (who would have attended Title I schools and have generated funds for your district) that you have a Title I program and offer consultation regarding participation in the program.
- Keep a record of letters sent and ensure that all schools contacted responded (either affirmatively or negatively) to your offer (return receipts is valid as record of outreach to eligible schools)

Step 3 – Timely and Meaningful Consultation
- A unilateral offer of services by an LEA, with no opportunity for discussion, is not adequate.
- Consultation must take place before an LEA makes any decisions that affect the opportunities of eligible private school children to participate in Title I programs.
- Provide program information, including school selection process, grade spans served, the number of low income public and private school children residing in the area, and the per-pupil allocation of each public school participating area.
- Obtain written affirmation that consultation has taken place (application’s Form 7 can serve as affirmation)

Step 4 – Program Development
- Benefits must be equitable to those offered to eligible public school students (not necessarily the same).
- Address the following issues:
  - How the children’s needs will be identified.
  - What services will be offered.
  - How and where services will be provided.
  - How the services will be assessed.
  - The size and scope of the equitable services to be provided, and the amount of funds to be used for those services.
  - Parental activities and compact development.
  - Professional development opportunities for officials and staff who work directly with students who participate in the program.

Step 5 – Supervisory Responsibilities
- Ensure that Title I services adhere to all Title I regulations and are coordinated with regular classroom instruction.
- Maintain control of funds, label materials purchased by Title I, and keep inventory of district Title I property.
- Ensure that progress toward meeting challenging academic standards is being measured and utilized for program improvement (i.e., evaluate program impact and include in District Title I program evaluation).
- Ensure that program plans adhere to the findings of Agostini v. Felton (see guidance at http://www.ed.gov/legislation/SEA/felton.html)
Questions
Resources

School Improvement Grant Programs Unit

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(781) 338-6230

http://www.doe.mass.edu/apa/titlei/parta/pss