

15. Serving Eligible Private School Students

Title I, Part A

**Statutory Requirements: Section 1120 (a); Section 1115 (b) (1) (2);
Sections 9503; Section 9504
Regulations: 200.63; 200.77; 200.78**

Overview

Districts are required to provide eligible children attending private elementary and secondary schools, their teachers, and their families with Title I services or other benefits, such as professional development, parent involvement, or materials and supplies (on loan from the public schools), that are equitable to those provided to eligible public school children, their teachers and their families.

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 §1115(b) of title I, which required the LEA to use multiple, educationally related, objective criteria in selecting children to participate in the Title I program. Under that section, certain children may be identified as eligible solely by virtue of their status: for example, homeless children and children who in the preceding two years had participated in Head Start, Even Start, Early Reading first, a title I preschool program, or a Title I, Part C (Migrant Education) program.

In all cases, Title I services, materials and supplies, are to be supplementary and cannot supplant funds.

Task Timeline

February, March, April

In spring, hold face to face planning and consultation meetings with the administrators of the private schools to develop a plan for service.

- You may want to consider discussing Titles II, III, IV, and V at this meeting because you need the administrators to indicate if they are interested in the services of those Titles. Refer to form PI-9550-AC.
- Discuss with the private schools how they can identify low-income students, like using free and reduced lunch or other comparable data such as scholarship information, reduced tuition and personal knowledge of catastrophic events in a family's life.
- Ask the administrators to list the address and the grade level of each low-income student. If they know the public school attendance information, that can be included as well. Ask administrators to send information back to Title IC Coordinator within two weeks. Provide form and self-addressed, stamped envelope.
- At this meeting, or a subsequent meeting with those schools that indicate they want services from Title I discuss and determine the following:
 - What services will be offered?
 - Where the services will be delivered?
 - How will the program be evaluated to determine its effectiveness?
 - What parent involvement and professional development services will be offered?
- After the private school students have been determined to be eligible, Title I services provided by the district for private school participants must include:

- A needs assessment to identify the eligible private school children.
- What services the district will offer to eligible private school children.
- How services will be provided.
- How, where, and by whom the district will provide services to eligible private school children.
- How the district will assess the academic services to private school, and how the district will use the results of that assessment to improve Title I services.

May, June, July, August

Allocation of Funds

- Funds must be allocated based in the number of private school students from low income families who reside in Title I participating public school attendance.

Consultation

- To determine which private schools a director needs to consult with, refer to the district's previous year consolidated application for all Title programs and/or the Wisconsin DPI directory, which has a listing of all public and private schools.
- Each district must maintain records of the meetings, any attempts to communicate (phone calls, certified letters, etc.) with the private schools.
- The district must annually submit to the DPI a written affirmation, signed by officials of each private school, that the required consultation has occurred. **This is Form PI-9550-AC.**
 - The form can be found at <http://dpi.wi.gov/esea/application.html#Forms> Affirmation of Consultation with Private School Officials.

Note: Simply providing instructional materials and supplies to assist eligible private school children is NOT an option available to the district.

During the consultation and planning sessions, the public and private school representatives must plan for the Title I services for the private school students to start at the same time as those provided to the public school students.

Allocating Title I Funds

The district must allocate funds to a participating public school attendance area or school on the basis of the total number of children from low- income families based on the following formula:

- Low-income counted public and private school students (5-17 years old) residing in Title I attendance areas generate a per-pupil allocation.
- The per-pupil allocation times the number of poor private school students residing in Title I attendance areas equal the funds available for private school Title I programming.
- The funds generated by low-income private school families in the attendance area may be pooled. Under this option, services provided to eligible children in a particular private school are not dependent upon the amount of funds generated by low-income children in the school.

Determining the Poverty of Private School Students

- **Same Measure of Poverty**—When available, the same measure of poverty as public schools should be used. Sometimes this is not possible and other means must be selected to arrive at the poverty numbers. These include:

- **Proportionality**—This method would allow for applying 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.
- **Comparable data**—This method would permit the use of an equated measure of low-income that can be correlated with the measure of low-income used to count public school students.

Use of Title I A Funds

Funds generated by poor private school students who reside in Title I attendance areas are used **only** for instructional services to eligible private school students. Instructional Costs would include:

- Summer School
- Services for neglected children
- Direct delivery of the agreed upon supplemental services

Funds should be budgeted off the top of the district's Title I allocation as a district reservation for noninstructional costs that are necessary to support the service delivery to eligible private school students. Noninstructional Costs would include:

- Insurance
- Maintenance
- Electricity
- Transportation
- Noninstructional technicians
- Mobile instructional vans/units
- Administration

Funds that the district allocated for special reservation costs must be equitably used to provide the following services to the eligible private schools:

- Professional Development
- Parent Involvement

Note: If a district uses the flexibility to transfer funds from other federal programs, when allowed, to support Title I instructional functions, dialogue is to take place with the private school regarding the percentage of these funds that will be made available to support the instructional programs for private school students.

Equitable Services

When considering if services to the private schools are equitable and meet the requirements of the law, the following guidelines should be used:

Instructional Program

- Assess and address the specific needs and educational progress of eligible private school children on a comparable basis as public school children
- Meet the equal expenditure requirements based on the funds generated by their low-income students
- Plan with the understanding that the programs do not have to be identical to the public school programs
- Provide private school children with an opportunity to participate that—
 - Is equitable to the opportunity provided to public school children
 - Holds reasonable promise of the private school children achieving the high levels called for the state's student academic achievement standards

Professional Development

- Consultation with private school teachers and administrators has taken place
- Is designed to meet the needs of the private school teachers who teach Title I students in their regular classrooms
- Is related to the improving the academic program area and instruction the students are receiving from the Title I program.
- Communication of how to access professional development services has taken place
- The appropriate percentage of funds is allocated to the private school teachers who teach eligible Title I students:
 - Determine what the percent of private school students served is in relation to all students served in the attendance area
 - Apply this same percentage to the amount of professional development funds reserved off the top of the allocation as displayed on the reservation page of the electronic application

Parent Involvement

- Consultation with private school officials and parents of participating private school students has taken place
- A parent compact between the district and parents of participating Title I students has been developed
- Parents of participating private school students are involved in the annual assessment of the effectiveness of parental involvement activities

Identifying Eligible Children to be Served

Efforts to identify the students in greatest need may include review of multiple, objective, educationally related achievement data, including the following criteria:

- achievement tests
- teacher referral and recommendation
- classroom performance
- grades
- interviews with parents

Children from preschool through grade two are selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.

Delivery of Services

Title I services must be supplemental in nature and cannot replace or supplant services that would, in the absence of Title I, be available to participating private school children. Joint planning between the public and private school representatives may consider these types of services:

- Specialized instruction outside the regular classroom. (team teaching is not permitted)
- Extended learning time (before and after school and in the summer)
- Family Literacy
- Early Childhood
- Home Tutoring
- Take Home Computers
- Computer-assisted instruction
- Combination of services listed above

Grade Levels/Grade Spans to be served

- If the district uses grade span groupings, such as grades 1-3, in a particular Title I school and the Title I program is in a K-5 school, eligible private school Title I students may be served from grades K-5, reflecting the total span of grades within the public school attendance center.
- The documentation from the needs assessment will determine the subject areas to be addressed.
- Program focus may vary between the public school and private school services based on the achievement needs of identified students.

Location of Services

- Services can be delivered on site at private schools including religious schools, neutral sites, or in the public school.
- If Title I services are offered on site at a religious school, efforts should be made to ensure that the space used is void of religious symbols during the time Title I instruction occurs.
- District officials must consult with private school officials before any decision is made about the location of Title I services.
- Title I instructors must not engage in religious instruction, or go into the regular classroom to deliver instruction.

Assessment of Title I Program Effectiveness

The public and private school representatives should determine what the evaluation plan will be during the early stages of consultation.

- The Title I requirement for public schools to test all students in grades 3-8 annually does not apply to private schools. However, it does apply to the Title I program provided by the district to private school students.
- While the assessments do not have to be the same for determining the effectiveness of the Title I program for public and private school students, comparable measures should be utilized.
- The district and private school officials must define “annual progress” for private school Title I participants.
- If state standards are not aligned with the private school’s curriculum, alternative standards that provide reasonable promise of private school students achieving the high levels called for the state’s student performance standards should be set jointly.

Resources

For more detailed information on topics related to serving eligible private school student, see the following website: <http://www.ed.gov/programs/titleiparta/psguidance.doc> for non-regulatory guidance document.