

Title I Equitable Participation for Private School Students

1

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Title I & School Support Team



Wisconsin Department of Public Instruction

The Law

3

- Under Title I, local educational agencies (LEAs) are required to provide services for eligible private school students, as well as eligible public school students.
 - §1120 of Title I, Part A of the Elementary and Secondary Education Act (ESEA).
- Services must be provided to students, teachers, and families.
- Services are determined after meaningful consultation with all private schools in the area.
- Services must be: secular; neutral; and non-ideological.

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Objectives:

2

- Understand the consultation process for Title I services to private schools.
- Understand how districts and private schools identify:
 - Eligible Title I students;
 - Best practices in student assessment and program implementation; and
 - Allowable expenditures.

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Contact Eligible Private Schools

4

- Contact ALL private schools within the boundaries of the school district to:
 - Determine participation and
 - Invite for consultation
- Collect and maintain on file a Private School Participation Verification Form (PI-9550-AC) for each nonprofit private school in the district.
 - <http://dpi.wi.gov/sites/default/files/imce/forms/doc/f9550-ac.doc>
- Upload the form to the Application after it is reviewed and signed.

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Annual Consultation Meeting

5

- Student enrollment
- Low-income private school students data
- Public school attendance areas, grade spans of private school students
- Evaluation of services provided in current year
- Allocations
- Services to be provided in new year (how, when, where, and by whom)
- Progress monitoring and exit criteria
- Evaluation of services provided in upcoming year

Enrollment Data

7

- Total number students living in each Title I attendance area
- Number of low-income students living in each Title I attendance area
- *This is NOT the total number of students attending the private school*
- Total number of students attending the private school within the boundaries of the LEA regardless of their poverty level



Allocation for Private School Services

6

Number of low-income private school students



Each student's public school attendance area per pupil amount



Instructional allocation for services

Instructional allocation for services



Allocation from reservations



Total allocation for private school services

Private School Equitable Participation Summary Report

8

PrivateSchool	Grade Span	Instructional Allocation For Services	Reservations Allocation for Services			Total Allocation for Services
			Centralized Services	Professional Development	Parent Involvement	
1615 Community Christian School	K4-12	\$3,993.95	\$0.00	\$114.44	\$0.00	\$4,108.39
4830 St John's Lutheran School	K4-08	\$12,737.90	\$0.00	\$267.03	\$0.00	\$13,004.93
4990 Saint Joseph Sch	K4-06	\$11,421.50	\$0.00	\$228.88	\$0.00	\$11,650.38
Total (Pooled Funds)		\$28,153.35	\$0.00	\$610.35	\$0.00	\$28,763.70

Select a private school from the drop down and click Go! to see the Private School Equitable Participation Detail Summary Report.

Community Christian School ▾ Go!

Back

Follow these steps to get to this report in your Title I application:

1. Log into the ESEA application
2. Click "Title I-A"
3. Click "Report Menu"
4. Click "Private School Equitable Participation Summary Report"

This is hypothetical data.

Options for Serving Private Schools

9

In **consultation**, the LEA and private school officials may choose one or both of the following options to serve eligible private school students:

- School-by-School Basis
- Pooling

Pooling

11

- Participating private schools combine funds allocated for all private school children in participating areas to create a pool of funds from which the LEA provides equitable service to eligible private school children who are in the greatest educational need and reside in participating public school attendance areas.
- Services provided to eligible children attending a particular private school do not depend on the amount of funds allocated for children in that school.

School-by-School Basis

10

- Provide equitable services to eligible children in each private school with the funds allocated for the children who reside in participating public school attendance areas and attend that private school.

Turn and Talk

12

A private school only wants supplies and instructional materials and does not want a teacher. Is this allowed?

Turn and Talk

13

No - Simply providing the private school with instructional materials/supplies is not an option available to the LEA because materials/supplies are not a Title I program. This would not result in equitable services.

Title I Services to Eligible Private School Children – Non-Regulatory Guidance #B-38

Eligible Private School Students Example

15

0777 Burlington Area School District 0449 Cornerstone Christian Academy			
Public School Attendance Area	Grade Span	Private school students in attendance area	Number of Low Income Private school students in attendance area
(0020) Burlington High	09-12	17	2
(0040) Nettie E Karcher School Title I Receiving School	05-08	16	2
(0060) Cooper Elementary	PK-04	17	3
(0110) Dr Edward G Dyer School	04-06	16	2
(0120) Lyons Center	PK-04	17	2
(0140) Waller Elementary Title I Receiving School	PK-04	17	2
(0160) Winkler Elementary Title I Receiving School	PK-04	17	2

Six students attending Cornerstone Academy generate an allocation but all 50 students living in the Winkler Elementary, Waller Elementary, and Nettie E. Karcher School attendance areas are eligible for Title I services.

Determine Private School Students Eligible for Title I Services

14

Private school student eligibility for Title I service is determined by:

- Educational need
 - In consultation with the private school, the district must establish multiple, educationally related, objective criteria to determine which private school children are most at risk of failing to meet state academic standards in mathematics and/or reading.

AND

- Residence
 - Private school students must live in a Title I receiving public school attendance area.

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Cross-District Services

16

- If students residing in District A's attendance area attend a private school located in District B and the private school elected to participate in District B's Title I services, District A must identify those resident students in their application.
- District A will collaborate with District B to provide services to eligible Title I students from District A attending private school within District B's boundaries.
 - Typically, District A will pay District B to provide the equitable services. The amount is based on the per pupil amount of the students' public school attendance area.

Determine Programming

17

- Rank eligible private school students
 - Private school students' academic levels are not compared to those of public school students
- Review the per-pupil amounts of the private school students' public school attendance areas of residence
- Serve the private school as a targeted assistance program

Turn and Talk

19

No - Title I funds may not be used to identify private school children who are eligible to participate in services.

However, the LEA may use Title I funds to determine the specific educational needs of eligible children.

Title I Services to Eligible Private School Children – Non-Regulatory Guidance #B-26

Turn and Talk

18

May an LEA use Title I funds to identify eligible private school children for Title I instruction?

Services to Private School Students

20

- Begin services in the private school at the same time as in the public school.
- Supplemental Instruction by Highly Qualified Teachers
 - Academic, research-based, *supplemental* programs that help students improve their academic achievement in the regular private school classroom (i.e., reading and math).
 - Must meet the needs of the private school students.
 - Services must be equitable to the public school but not necessarily identical.
 - Teachers must be either employed by Public School District or Vendors.
- Examples:
 - Pull-out small group instruction;
 - Extended day services;
 - Summer programs; and
 - Computer-assisted instruction.

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Turn and Talk

21

A private school does not want the public school to provide services to students. The private school officials would like to provide the Title I services themselves and just be reimbursed by the LEA. Is this allowed?

Services to Private School

23

- **Assessment of Student Progress:**
 - Use assessments comparable to the public school;
 - Ensure alignment to the definition of “annual progress” determined during the consultation process; and
 - Review exit criteria and results.

Turn and Talk

22

No - Title I services must be provided:

- by either an employee of the LEA **OR**
- through a contract between the LEA and vendor.

These employees/vendors must be independent of the private school and any religious organization.

The employee or contract must be under the supervision of the LEA.

The private school can never be reimbursed by the LEA.

Title I Services to Eligible Private School Children – Non-Regulatory Guidance #B-51

Location of Services

24

- **Services can occur at the private school or at the public school.**
 - For example, private school Title I students can receive services at the public school in an after-school program setting or summer school.
- **It is the public school district’s responsibility to find space for these services.**

Turn and Talk

25

Can the LEA hire or contract with a private school employee to provide the Title I services?

Services to Private School Staff

27

• Professional Development:

- Private school teachers working directly with Title I students may participate
- Must be related to increasing academic achievement (reading/mathematics) of Title I students
- Must be aligned to the private school's needs assessment and focused on increasing Title I students' achievement
- Must be on-going and secular

LEA's evaluation of PD activities should include the review of participants' assessment scores and impact on student achievement.

Turn and Talk

26

Yes - as long as the person is independent of the private school during the provision of Title I services.

The private school employee can only be employed (or on contract) by the LEA for Title I purposes outside of the time s/he is employed by the private school.

It is still the LEA's responsibility to supervise and evaluate the Title I program in the private school.

Title I Services to Eligible Private School Children – Non-Regulatory Guidance #B-55

Services to Private School Staff

28

• Examples:

- Attend the LEA's professional development offerings
- Attend conferences related to increasing academic achievement (reading/mathematics) of Title I students
- Participate in book studies

Services to Private School Parents

29

- **Parent Involvement:**
 - LEAs must have Title I compacts with parents of private school students receiving Title I services.
 - LEAs must collaborate with private school leaders and parents of Title I students to plan parent involvement activities.
 - Parent involvement activities must focus on academic progress and achievement of the students receiving Title I services.

Evaluation of Title I Services for Private Schools

31

- **Using the measures determined during the consultation process, the public school and private school officials need to review the efficacy of the following:**
 - Title I services to students
 - Title I services to parents
 - Title I services to staff
- **If evaluations demonstrate that services were not effective, public school and private school officials will modify Title I services for the next school year.**

Services to Private School Parents

30

- **Examples:**
 - Private school parents of Title I students participate in the public Title I school(s) parent involvement activities.
 - Private school hosts parent involvement activities specific for parents of Title I students.
 - Title I teachers communicate with parents on students' academic progress.

Allowable Expenses

32

- **Salary and fringe for highly-qualified teachers hired directly by the LEA**
- **Professional development for staff working with Title I students**
- **LEA contracts with third-party providers to provide instructional services**
- **Instructional media and supplies to implement the Title I programs (remains the property of the LEA)**
 - Remember that any equipment and materials purchased with Title I funds may be used only by Title I students in the Title I program.

Payments shall not be made directly to the private school.

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Resources

33

U.S. Department of Education Title I Services to Private School Children Non-Regulatory Guidance

<http://www2.ed.gov/programs/titleiparta/psguidance.doc>

Affirmation of Consultation with Private School Officials (PI-9550-AC)

<http://dpi.wi.gov/sites/default/files/imce/forms/doc/f9550-ac.doc>

Title I Equitable Services Set-Aside Excel Calculator

http://titleone.dpi.wi.gov/files/titleone/xls/private_school_participation_calculator.xlsx

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Contacts

34

- **Title I Education Consultant Directory**
 - <http://dpi.wi.gov/title-i/consultant-directory>

- **Title I Network Coordinators**
 - <http://dpi.wi.gov/title-i/network/contacts>