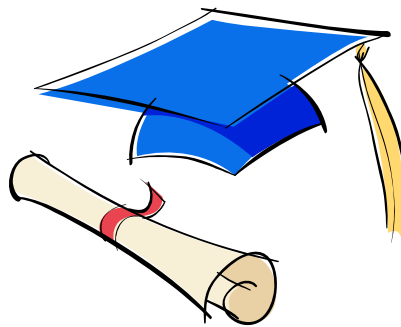


North Dakota Department of Public Instruction  
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Bismarck, North Dakota 58505-0440

# Title I



## Private School Toolkit

**March 2006**

# **Title I**

# **Private School Toolkit**

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## Overview of NCLB Law on Private School Services

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. 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 have an educational need as identified through a student selection process.

Under Title I, school districts are required to provide services for eligible private school students, as well as eligible public school students. In particular, §1120 of Title I, Part A of the Elementary and Secondary Education Act (ESEA), as amended by the *No Child Left Behind* (NCLB) Act, requires a participating district to provide eligible children attending private elementary and secondary schools, private school teachers, and private school 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 purpose of this Private School Toolkit document is to provide both public and private school personnel with guidance and sample forms that can be used in coordinating Title I services in a private school.

The format of this document is outlined on the index page. The toolkit includes a step-by-step process form, a contact list, guidance on key private school issues, and several sample forms utilized in private school programming.

This guidance relates specifically to Title I, Part A services for children attending a private school. This document can be accessed at [www.dpi.state.nd.us/title1/nonpublic.shtm](http://www.dpi.state.nd.us/title1/nonpublic.shtm) on the Department of Public Instruction's Title I website. Under a number of other US Department of Education (USDE) programs, private school students are entitled to receive equitable services. For information regarding these other federal programs, log on to [www.ed.gov/about/offices/list/oii/nonpublic](http://www.ed.gov/about/offices/list/oii/nonpublic) on the USDE website.

If you have any questions concerning any of the issues addressed in this toolkit, please contact:

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600 E. Boulevard Ave., Dept. 201  
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## Private School Services Steps Involved

- The North Dakota Department of Public Instruction (NDDPI) Grants Manager sends correspondence to all private schools asking of their intent to participate in the federal Title programs (SFN 50412). **February/March**
- Private schools complete the form, keep a copy for their records, and return it to the appropriate public school district personnel. Private schools do not send the form to the NDDPI. **March**
- The public school district ensures that forms are received from all private schools. Follow-up may be necessary to ensure inclusiveness of responses. **March**
- The public school district makes copies for their records and forwards all forms back to the Grants Manager at the NDDPI. **March**
- The State Title I office generates a list of all private schools requesting Title I services for the subsequent school year. The Title I Private School Toolkit is updated with this information. **March/April**
- The public school district collects poverty data on all participating private schools. The district, in consultation with private school personnel, makes a determination as to which program option(s) will be used as outlined in the Private School Guidance on page 4. **March/April**
- School district personnel input poverty data on the State Automated Reporting System (STARS) as part of the Title I Targeting process. **April**
- The public school district receives building allocations, which include the private school amounts, from the Department of Public Instruction. **April/May**
- The public school district shares information with the participating private school(s). **April/May**
- The public school district sponsors a public/private school consultation meeting to discuss pertinent Title I issues. **April/May**
- The items that need to be discussed at the consultation meeting are listed on the Consultation Form (see Appendix B). In particular, the district needs to decide whether or not private schools will keep individual allocations generated or pool private school funds. **April/May**
- The Affirmation of Consultation with Private School Officials Form must be submitted to the State Title I office on the STARS. **April/May**
- The public school district and private school personnel work together to complete the forms needed to input data for the consolidated application, (i.e., program description, equitable set aside worksheet, private school activities, and budget). This information will all be submitted electronically on the STARS by the public school district personnel. **May/June**
- The public school district has private school officials review the completed private school portion of the consolidated application before it is submitted on the STARS to the Department of Public Instruction. **May/June**
- The public school district Title I staff make determinations on which students are eligible to receive Title I services (i.e., student selection process). **Spring or Fall**
- The public school district submits the Title I Final Financial Report and Private School Addendum to the State Title I office. **June/July**
- Title I services to private school students begin. **Fall**
- The public school district communicates regularly with private school officials. **Yearlong**
- Public school Title I staff at the private school implements parental involvement activities. **Yearlong**
- Public school Title I staff at the private school implements professional development activities. **Yearlong**
- Public school Title I staff at the private school regularly assess private school students' progress. **Yearlong**
- Public school Title I staff at the private school assess the Title I program at the private school(s). **Spring**

# NONPUBLIC SCHOOL PARTICIPATION—FEDERAL TITLE PROGRAMS

NORTH DAKOTA DEPARTMENT OF PUBLIC INSTRUCTION  
SFN 50412 (Rev 1/06)



Each school district shall provide an opportunity for the equitable participation of children and teacher(s) from nonpublic school(s) in the purposes and benefits of the titles listed below. If the nonpublic school(s) choose to participate in any of the program(s) identified below, they will be given the opportunity to be involved in the planning, implementation and evaluation of the program(s) selected. No Child Left Behind (Title IX, Part E, Subpart 1).

## I. Nonpublic School(s)

Complete section A, place a check in the appropriate column in section B to indicate participation, and return to your public school district.

### A.

Nonpublic School Name		Name of Public School District	
Name of Nonpublic School Administrator		Telephone	
Address of the Nonpublic School			
City		State	Zip Code
Signature of Authorized Nonpublic School Official			Date

### B. Federal Title Programs

- Yes  No Title I, Part A, Disadvantaged Children Meet High Academic Standards  
 Yes  No Title II, Part A, Teacher and Principal Training and Recruitment  
 Yes  No Title II, Part D, Enhancing Education Through Technology  
 Yes  No Title III, English Language Acquisition, Language Enhancement, and Academic Achievement  
 Yes  No Title IV, Part A, Safe And Drug-Free Schools & Communities  
 Yes  No Title V, Part A, Innovative Programs

## II. Public School District:

A signed participation form must be submitted to the Department of Public Instruction for all approved nonpublic schools in your district, whether they are participating or not. Consolidated Applications will not be approved if these forms are not submitted.

*Return the forms by March 20, 2006 to:*  
Grants Manager  
Department of Public Instruction  
600 East Boulevard Ave, Dept 201  
Bismarck, ND 58505-0440

North Dakota Department of Public Instruction  
 Dr. Wayne G. Sanstead, State Superintendent  
 600 E. Boulevard Avenue, Dept. 201  
 Bismarck, ND 58505-0440

**Private Schools  
 Receiving Title I Services  
 2005-2006**

<b>School District</b>	<b>Private School</b>
Belcourt	St. Ann's Catholic School
Bismarck	Cathedral of the Holy Spirit Elementary
	Martin Luther
	St. Anne Elementary
	St. Mary's Elementary
Devils Lake	St. Joseph Elementary
Dickinson	Trinity West Elementary
	Trinity East Elementary
	Trinity High School
Fargo	Grace Lutheran Elementary
	Holy Spirit Elementary
	Nativity Elementary
Fort Yates	St. Bernard Mission
Grand Forks	St. Michael's Elementary
	Holy Family Elementary
Jamestown	St. John's Academy
Langdon	St. Alphonsus Elementary
Mandan	St. Joseph Elementary
	Christ the King Elementary
Minot	Little Flower Elementary
	St. Leo's Elementary
	Bishop Ryan High School
Rugby	Little Flower Elementary
Valley City	St. Catherine Elementary
Wahpeton	St. John's Elementary
Williston	St. Joseph's Elementary

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# **Private School**

# **Guidance**

## Private School Guidance

### Ways to Document and Collect Poverty Data on Private School Children

Section 1120(c)(1) of the Title I statute and §200.78(2) of the regulations allow a school district to calculate the number of children who are from low-income families and attend private schools in several ways. Listed below are five ways that define how a district can document and collect poverty data on private school children.

1. Using the same measure of poverty. If available, a school district 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 allowing such survey results to be extrapolated if complete actual data are unavailable. (For further details and a sample form, reference Appendix A, at the end of this Private School Guidance section.)
3. Using comparable poverty data from a different source. If data from the same source used for public school children are not available, a district may use poverty data for private school children that are from a different source than the data it uses for public school children, so long as the income threshold in both sources is generally the same.

For example, a district uses free and reduced-price lunch data but private school children do not participate in the free and reduced-price lunch program; however, private school officials are able to provide a district 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 scholarship programs. If the different sources use different definitions of low-income, a district would need to adjust the results accordingly.

4. Using Proportionality. A school district 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, a district will need the addresses and grade levels of those students attending private schools.

For instance, a district calculates the percent of poverty of a public school attendance area to be 60 percent. The district then applies the poverty percentage of the public school attendance area to the number of private school children residing in that public school attendance area. For example, 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 district then calculates the per-pupil amount on 30 children.

5. Using an equated measure. A district may use an equated measure of low-income by correlating sources of data – that is, determining the proportional relationship between two sources of data on public school children and applying that ratio to a known source of data on private school children. For example, a district uses free and reduced-price lunch data, but those data are not available for private school students. However, if TANF data are available, the district could determine an equated measure of poor students in private schools based on free and reduced-price lunch data by correlating the two sets of data as follows:



TANF in the public school is to free and reduced-price lunch as TANF in private schools is to “X”.

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

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

\* The school district has final authority on which method is used to collect data on poverty for private school children.

It is not necessary that a district adopt a uniform procedure with regard to all private schools. Different poverty measures may be used in different private school buildings, if needed.

## Determine Allocation Amounts

Under §1113(a) of the Title I statute and §200.78 of the regulations, a district must allocate Title I funds to public school attendance areas, who are eligible and selected to participate, in rank order on the basis of the total number of children from low-income families residing in each area.

A public school attendance area is eligible if their poverty percent is at or above the district poverty percent. A district can determine which grade spans (Elementary/Middle/High School) they want to serve with Title I funds. Private school services can only be provided in the same grade spans as the public schools.

If Title I services are only provided in elementary buildings, then Title I private school services can only be provided in elementary buildings. However, the grades served within the building can vary. For example, if the public school chooses to focus on K-3, the private school can elect to serve eligible students in grades 1-6, if those grade levels are contained in the elementary school building.

A district may, if necessary, identify and rank its eligible school attendance areas on the basis of the number of children from low-income families attending public schools only. Once the participating public school attendance areas have been established, a per-pupil allocation (PPA) is determined for each 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 district calculates the total amount of funds for each area. From this amount, the district reserves an amount of funds for the private school children (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. Low-income public and private school students residing in the same Title I attendance areas generate the same per-pupil amount.

## Equitable Set-Asides

Section 200.64(a)(2)(i)(A) of the Title I regulations requires that, if a district reserves funds for instructional and related activities for public elementary or secondary school students at the district level, the district must also provide from these funds, as applicable, equitable services to eligible private school children. The amount of funds available to provide equitable services from the applicable reserved funds must be proportional to the number of private school children from low-income families residing in participating public school attendance areas.

The following instructional services are included in the equitable services provision of off-the-top costs from the district's Title I allocation:

- Set-Asides for teacher quality (districts are no longer required to set funds aside for teacher quality)
- Professional development (excluding requirements for program improvement)
- Parental involvement
- Summer school
- Other instructional services (i.e., Preschool or jumpstart programs)

## **Title I Carryover Funds**

Title I law requires school districts to provide eligible private school children with Title I educational services or other benefits that are equitable to those provided to eligible public school children.

Title I funds are allocated on the basis of poverty. Services provided to private school students should reflect the minimum allocation amount generated. When the public school district submits the Title I final financial report, if any Title I private school funds are remaining, the district must issue the balance of these funds as carryover funds to the private school for the subsequent school year.

In addition, if the district has a significant amount of carryover funds, they may elect to provide private schools with a portion of those funds. However, the amount would need to be reasonable and justifiable.

## **Including Additional Title I Funds into the Process**

In some districts, there may be additional funds that are used to supplement Title I activities and expenditures. These funds include Title I reallocated dollars and other federal Title I funds that are REAPed or transferred into the Title I program.

Reallocated funds are the dollars generated from school districts that have an excess of Title I carryover. The reallocated funds are competitive dollars which require a school district to submit a budget revision on the ORS and describe in detail how the reallocated funds will be used during the current school year. If the reallocated funds will be used for district-level activities, then districts must use the worksheet to calculate the equitable set-aside amount for the private schools within the district.

Any funds transferred into the Title I program from other ESEA programs under the transferability or REAP authority are subject to equitable participation of private school students. A district may not transfer funds into the Title I program solely to provide services for private school students.

Any funds that the district receives due to being identified for program improvement are not subject to private school regulations.

## **Affirmation of Consultation Requirements**

District consultation with officials from private schools is an essential requirement of an effective Title I program for eligible private school children, their teachers, and their families. Consultation involves discussion between public and private school officials on key issues that affect the ability of eligible private school students to participate equitably in Title I programs.

The requirements for consultation are in 1120(b) of the Title I statute of 200.63 of the Title I regulations. Consultation by a district must include meetings between the district and appropriate private school officials and must occur before the district makes any decision that affects the opportunity for eligible private school children, their teachers, and their families to participate in Title I programs.

Each school district must obtain a written affirmation, signed by officials of each private school with participating children or appropriate representatives of the private school officials that the required consultation has occurred. An example affirmation form is found in Appendix B. This form must be submitted to the State Title I office annually.

## **Program Options**

In consultation, the school district 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.

1. School-by-School Option: 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. Under this option, the services provided to private school children are determined by the amount of funds allocated to each private school building.
2. Pooling Option: Combine funds allocated for private school children in all participating areas to create a pool of funds for which the district provides equitable services to eligible private school children who are in the greatest educational need of those services and reside in participating public school attendance areas. 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, rather, the services focus on the neediest children throughout the entire private school system.

If there are no children attending the private school(s) from low-income families to warrant the allocation of instructional funds and the district is not pooling the funds, then children in that private school who meet the educational criteria will not receive Title I services because there are no funds available to provide services. If the district is pooling funds, then eligible low-achieving children who meet the educational criteria and attend private schools with no children from low-income families may receive Title I services. (See Appendix C for an example of each program option.)

## **Determining Services**

The district, in consultation with appropriate private school officials, determines the appropriate Title I services based on the needs of the private school students. Title I services may focus on subject areas that are different from those provided to public school students, as long as these services are provided in the same grade-span as the services provided to public school children. Schoolwide programs may not be operated in private schools.

The district is responsible for planning, designing, and implementing the Title I program and may not delegate that responsibility to the private schools or their officials. The district provides a Title I program to private school children, employing methods and instructional strategies for improving academic achievement that have been shown to be effective through scientifically based research. The district must also give consideration to providing extended learning time. Based on the needs of children to be served, the district must provide an instructional program that not only supplements but also is well coordinated

with the instruction that the private school children are receiving in their regular classrooms. This program should complement classroom instruction and should not be a separate instructional program.

The Title I teacher may use the same textbooks and materials as used in the regular private school classroom so long as the textbooks and materials are secular, neutral, non-ideological, and the instructional services supplement and do not replace the instructional program in the students' regular classroom.

The U.S. Department of Education (USDE) believes that the constitutionality of Title I instructional services provided in a private school will depend on consideration of the program's safeguards viewed as a whole, not any one factor, such as whether or not there are religious symbols in the space used for that instruction. The USDE guidance states that a valid program must contain safeguards to ensure that public employees do not promote religion in the course of carrying out their Title I duties.

Title I services for private school participation may be provided at various locations, including the private school, neutral sites, or public schools. District officials must consult with private school officials before any decision is made about the location of Title I services. If appropriate space is available, the least disruptive and least expensive location will be the private school in which the participating children attend.

After consultation with private school officials, a district may provide Title I services other than direct instruction if the provision of services, such as counseling, staff development, and parental involvement are appropriate to assist those children identified as failing or most at-risk of failing to meet high student academic achievement standards. The district must measure the effect of services on the academic achievement of participating children.

Additional services for participating private school children include, but are not limited to, the following:

- Instructional services provided by public school employees or third-party contractors
- Extended-day services
- Family literacy programs
- Counseling programs
- Computer-assisted instruction (CAI)
- Home tutoring
- Instruction using take-home computers

For Title I services, a district may not just provide a private school with instructional materials and supplies paid with Title I funds. Simply providing the private school with instructional materials and supplies is NOT an option available to the district. This practice is not considered a proper private school Title I program and it does not meet the equitability requirements outlined in NCLB.

## **Maintaining Fiscal Control**

Private school officials have no authority to obligate or receive Title I funds. The statute clearly states the district must maintain control of Title I funds, materials, equipment, and property. No Title I funds may be paid to a private school.

Section B-41 of the USDE's guidance on providing Title I services to private school students further clarifies that a private school is not permitted to order supplies or materials for its Title I program and seek reimbursement from the district, since private school officials have no authority to obligate or receive Title I funds. Districts must retain all documentation showing how it spent Title I funds for private school students.

Districts will need to document that any Title I-funded equipment or materials located at private schools are properly labeled as public school district property that was purchased with federal funds.

## **Staff Qualifications**

Section 1120(d)(2) of the statute requires that Title I services be provided by an employee of a public school district. These employees must be independent of the private school and any religious organization in the provision of those services and such employment or contract must be under the control and supervision of the district.

Teachers and paraprofessionals who provide Title I services to private school participants and are employees of a district must meet the Highly Qualified Staff requirements. The highly qualified personnel requirements only apply to those teachers and paraprofessionals who are directly employed by the district.

A district may hire a private school teacher to provide Title I services to private school participants as long as the private school teacher meets the highly qualified teacher standards required in the Title I statute and is independent of the private school in the provision of Title I services. The private school teacher can only be employed for Title I purposes outside of the time he or she is employed by the private school and the private school teacher must be under the direct supervision of the district with respect to all Title I activities.

Paraprofessionals providing instructional support within a Title I program must work under the direct supervision of a public school Title I teacher and meet the NCLB requirements for aides/paraprofessionals.

## **Student Eligibility**

Educational need is determined by whether or not the private school child meets the requirement of Title I Targeted Assistance Programs, which requires the use of multiple, educationally related, objective criteria in selecting children to participate in the Title I program. Children from preschool through age two (2) are selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures of educational need.

Student eligibility for Title I services for private school children is determined by:

1. Residence in a participating public school attendance area, and
2. Educational need.

Poverty is not a criterion. Criteria for services are determined in consultation with private school officials. The district must establish multiple, educationally related, objective criteria to determine which private school children are eligible for Title I services, and within the eligible group, which children will be served.

Title I, Part A funding may not be used to identify private school children who are eligible to participate. Title I, Part A funds may be used to select participants from among those who are eligible and to determine the needs of the students.

It is the district's responsibility to verify that the eligible private school children reside in participating public school attendance areas. This verification process must be documented. (See Appendix D for the example form.)

Schoolwide programs may not be operated in private schools, only targeted assistance programs are allowed.

When the number of eligible children within a private school is very small, the district should consider other options for services. They might adopt methods that are cost-effective for serving small numbers, such as take-home computer programs, individual tutoring programs, professional development activities with the classroom teacher of Title I participants, or other strategies.

## **Parental Involvement**

Section 1118 of Title I requires a district to reserve funds off the top of its Title I allocation to carry out required Title I parental involvement activities.

Parents of eligible private school children must be served using a portion of the parental involvement set-aside. The district uses the number of private school students in each attendance area to calculate the mandatory percentage of the set-aside needed for parents of eligible private school students.

A district must provide equitable services to parents of private school participants from the funds set-aside for this purpose. Activities for the parents of private school participants must be planned and implemented after meaningful consultation with private school officials and parents. Activities districts can provide parents should assist private school students in achieving high academic standards. This includes a written agreement between the district and parents of private school Title I students regarding the responsibilities of the district and parents in the Title I program, parent meetings, communication between the Title I teachers and parents on students' academic progress, parent-teacher conferences, and parent education.

Examples of Parental Involvement Activities:

1. During the consultation process, the district, private school officials, and parents discuss a number of options for parental involvement in the Title I program, including parent meetings, parent policies, parent compacts, parent-teacher conferences, parent training activities, and reasonable access to Title I staff. After considering the needs and views of the private school parents and school officials, the district conducts an annual meeting with parents, initiates written compacts between the district and parents outlining their shared responsibilities in the Title I program, and provides training for parents on how to work at home with their children in reading and math. The district also provides parents of each private school participant with an individual student report on the student's performance on the North Dakota State Assessment (NDSA) or on an appropriate alternative assessment and informs parents about how the student is achieving in the Title I program through monthly assessments and reports to parents.
2. One district encourages and enhances parental involvement through hands-on workshops and individual meetings to provide parents with strategies and techniques for improving their children's learning. For example, a joint compact between the Title I teachers and the parents of Title I students outlines the shared responsibilities for improved student achievement under Title I using books and tapes in a read-aloud program. In addition, parents use a variety of teacher-made and commercially prepared activity kits, resource books, and guides to enhance their involvement in their children's education. Progress reports are distributed to parents twice a year, and a parent representative from each private school community is invited to the District-wide Private School Steering Committee Meeting to share ideas and recommendations regarding services to be implemented for private school participants, their teachers, and their families.

## Professional Development

If a district reserves funds off the top of its Title I allocation for carrying out district Title I professional development activities, the district must provide equitable services to teachers of private school participants from this set-aside amount. A district calculates these equitable services from the reserved funds in proportion to the number of private school children from low-income families residing in participating public school attendance areas.

The district is required to provide professional development activities for Title I teachers who are employees of the district. The costs of this training should be paid from the funds reserved for the professional development of the district's teachers and not from the funds required to provide equitable services to teachers of private school participants.

The professional development activities for private school teachers should address how those teachers can better serve Title I students, such as by providing information on evidence-based reading and mathematics instruction. It is inappropriate to use these funds to upgrade the instructional program in the regular classroom of the private school.

Private school officials are not authorized to obligate or receive Title I funds. The statute clearly states that the district must maintain control of Title I funds. No Title I funds may be paid to the private school.

Title I funds may be used to pay for stipends for private school teachers, if reasonable and necessary. For example, if the professional development activity is conducted during after-school hours or in the summer, stipends may be needed to compensate teachers for their participation outside their regular employment hours. Stipends for private school teachers must be available on the same basis as those for public school teachers and the stipends must be paid directly to the private school teachers for their own use and not to the private school.

After consultation, the district should offer professional development activities at a time and place that is convenient for the teachers of private school participants. Title I funds may not be used to hire substitute private school teachers.

## Assessment

A district must annually assess the progress of the Title I program toward enabling private school Title I participants to meet the agreed-upon standards. The district may use the NDSA (under §1111(b)(3) of Title I) or other assessment measures that more accurately reflect the progress of the private school participating students toward meeting the standards that the district, in consultation with private school officials, have determined as appropriate. Every year, the district and private school officials must consult on what constitutes annual progress for the Title I program. In measuring annual progress, the district has the flexibility to group children in a manner that will provide the most accurate information about their progress. For example, the district may decide to group children by instructional method, grade level, school, or other appropriate basis. If the private school Title I program does not make the expected annual progress, the district must make modifications to the Title I program to address the identified needs on an annual basis.

While districts are required to assess progress of Title I students annually, they should also consult with private school officials/teachers regularly about the progress the private school Title I students are making in their regular classrooms.

A district normally would assess private school children in the subjects in which the district provides Title I services to those children.

Title I funds may be used to assess private school children if the assessment is used only for Title I purposes. However, if an assessment is conducted system-wide for other purposes, it may not be paid for with Title I funds. If private school children, in general, are included in the NDSA, Title I funds may not be used to pay for the assessment of those private school children participating in Title I.

Officials of the private schools may provide the district with the assessment data on Title I participants that the private school has collected as part of its testing program. However, private school officials are not obligated to do this, and refusal by private school officials to provide these data does not release the district from its obligation to provide services and assess the progress of the private school participants in the Title I program.

## **Non-Applicable NCLB Provisions**

There are certain key Title I provisions in the NCLB Act that are not applicable to private school students or schools. These would include:

- Assessment – Private schools are not required to give the NDSA to their students.
- Adequately Yearly Progress – The NDDPI does not generate an AYP report for private schools.
- Program Improvement – Private schools can not be identified for program improvement.
- School District Profiles/Report Cards – The NDDPI does not generate a report card or profile for private schools.
- Highly Qualified Staff Provision – NCLB only mandates that public school teachers meet the highly qualified requirements. However, ND aligned our State law to NCLB. Therefore, all teachers who are issued a ND teaching license must meet the highly qualified requirements.
- Aides/Paraprofessionals – NCLB only requires aides/paraprofessionals paid with Title I funds to meet the new requirements of NCLB. Therefore, any aide/paraprofessionals working in a Title I program in a private school, would need to meet the provisions.
- Parents' Right to Know – The NCLB law incorporates a Parents' Right to Know Clause which requires that at the beginning of each school year, a school that receives Title I funds must notify all parents of all students that they may request information regarding the professional qualifications of teaching staff. This provision does not apply to private schools.

## **Complaint Procedures**

Section A-10 of the USDE's guidance states that private school officials have a right to complain to the NDDPI if they feel that their district either hasn't engaged in timely and meaningful consultation, or hasn't considered the private school's views in planning for Title I services for its students. Districts need to have a copy of their district's and state's complaint procedures. Documentation must be on file and available showing that these procedures are available to any private school officials who seek them. (See Appendix E for the North Dakota State Policy.)



# **Appendixes**

**A – E**

## Appendix A

### Option 2: Document To Collect Poverty Data on Private School Children

Using comparable poverty data from a survey and allowing such survey results to be extrapolated if complete actual data are unavailable.

- a. In order to obtain the number of private school children from low-income families, a district may use a survey to obtain poverty data comparable to those used for public school students. To the extent possible, the survey must protect the identity of families of private school students. The only information necessary for a district to collect in a survey of private school children is:
  - (1) Geographic information verifying residence in a participating public school attendance area;
  - (2) Grade level of each child; and
  - (3) Income level of parents.

A district should not require that the private school officials give the names of low-income families.

- b. After obtaining income data from a representative sample of families with children in private school, a district may extrapolate those data to the entire private school student population if complete actual data are unavailable. The district should take care to ensure that the data are truly representative of the private school students in the district.

Examples of Representative Sample and Extrapolation:

Column 1	Column 2	Column 3	Column 4	Column 5
Public school attendance area	# of resident private school children	# of private school children submitting surveys	# of low-income private school children from surveys	Extrapolated # of low-income private school children
A	150	115	100	130
B	20	10	4	8

Key:

Column 1. Public school attendance area

Column 2. Number (#) of resident private school children

Column 3. Number of private school children submitting surveys

Column 4. Number of low-income private school children on returned surveys

Column 5. Extrapolated number of low-income private school children

Calculations:

Column 5 (extrapolated number of low-income children) =

Column 4 (# of low-income on survey) multiplied by Column 2 (# resident private school children)

Column 3 (total submitted surveys)

OR 
$$\frac{100 \times 150}{115} = 130$$

$$\frac{4 \times 20}{10} = 8$$

# Sample Form for Private School Officials to Submit to School Districts\*

## Private School Students Living in Poverty

Name of Private School \_\_\_\_\_

Public School District \_\_\_\_\_

Please provide the grades and geographic information verifying residence in a participating public school attendance area of those families that meet the poverty criteria of \_\_\_\_\_ [insert here the poverty criteria used—e.g., U.S. Department of Agriculture for the free and reduced-price lunch program]. Do not provide the names of the families or students.

---

<b>Grades</b>	Geographic Information

\* This is not an official U.S Department of Education document. It is provided only as an example.

## **School District Sample Form for Use by Private School Officials\***

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 services to eligible students in our private school. Determining the number of our students, by public school district of residence, who would qualify for free and reduced-price lunches, accomplishes this. The information requested below is confidential. It is not necessary to provide family names.

- A. Find your family size and look at the annual gross income level listed beside it on the chart printed below. (Chart information was obtained from the Income Eligibility Guidelines document provided by the NDDPI Child Nutrition and Food Distribution Programs.)

<b>Family Size</b>	<b>Annual Gross Income For 2005-2006</b>
One	\$9,800
Two	\$13,200
Three	\$16,600
Four	\$20,000
Five	\$23,400
Six	\$26,800
Seven	\$30,200
Eight	\$33,600

- For each additional family member over eight, add \$3,400 to your Annual Gross Income.
- 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."

- B. Is your family income less than the amount listed on the chart on the line beside your family size?  yes  no

- 
- C. Is your family eligible for food stamps?  yes  no

- 
- D. Are you receiving Temporary Assistance to Needy Families (TANF)?  yes  no  
(Formerly AFDC or Public Assistance)

- 
- E. Please provide the following information:

Address: \_\_\_\_\_  
\_\_\_\_\_

Public school district in which you reside: \_\_\_\_\_

Grade levels of your children: \_\_\_\_\_

**\* This is not an official U.S. Department of Education document. It is provided only as an example.**



## Appendix C

### Program Options

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

Public school attendance area	Column A Per Pupil allocation (PPA) by attendance area	Column B Number of public school low-income children by attendance area	Column C Number of private school low-income children by attendance area	Column D Total allocation for each public school (Col. A X Col. B)	Column E Amount available for Title I services to private school children (Col. A X Col. C)
School A	\$800	150	17	\$120,000	\$13,600
School B	\$800	130	8	\$104,000	\$6,400
School C	\$800	100	3	\$80,000	\$2,400
School D	\$0	200	7	0	0
School E	\$0	140	6	0	0

\*Public schools D and E are not eligible for Title I services.

Option 1 – School-by-School Option – Use funds allocated for eligible private school children to provide Title I services on a school-by-school basis to eligible private school children residing in participating public school attendance areas.

#### Private School #1

#### Private School #2

17 Low Income Residing in A = \$13,600

8 Low Income Residing in B = \$6,400

7 Low Income Residing in D = \$0

3 Low Income Residing in C = \$2,400

6 Low Income Residing in E = \$0

Total for services to eligible children attending private school #1 = \$20,000

Total for services to eligible children attending private school #2 = \$2,400

Option 2 – Pooling – Combine (pool) funds allocated for all eligible private school children to be used to provide Title I services to eligible children who reside in participating public school attendance areas and attend any private school.

Private School #1 = \$20,000

Private School #2 = \$ 2,400

Total for services to the eligible children in any private school = \$22,400



## Appendix E

### Federal Title Programs Dispute Resolution Procedures For North Dakota

Federal regulations require that each state adopt procedures for receiving and resolving disputes pertaining to any of the federal Title programs. A complaint will include an investigation by Department of Public Instruction (DPI) staff that will result in a determination of findings of facts, conclusions, and reasons for a final decision.

If a parent, school personnel or any interested person wishes to file a complaint, the following process must be followed:

- The written complaint must be sent via mail or e-mail to:

[Director of Specific Title program]  
North Dakota Department of Public Instruction  
600 E Boulevard Avenue, Dept 201  
Bismarck, ND 58505-0440

#### Federal Title Directors

Consolidated Grants/REAP	Beverly Fischer	bfischer@state.nd.us
Title I Part A	Laurie Matzke	lmatzke@state.nd.us
Title II Part A	Greg Gallagher	ggallagher@state.nd.us
Title II Part D	Chris Kalash	ckalash@state.nd.us
Title III Part A	Mari Rasmussen	mrasmussen@state.nd.us
Title IV Part A	Valerie Fischer	vfischer@state.nd.us
Title V Part A	Greg Gallagher	ggallagher@state.nd.us

- Any complaint must include:
  - The date;
  - The name of the district, unit, or individual the complaint is against;
  - The name, address, and telephone number of the person making the complaint;
  - A detailed description of the complaint, including specific facts; and
  - The signature of the person making the complaint.

When a written complaint is filed, the appropriate DPI Title director will investigate and issue a written response within sixty (60) calendar days from the date the complaint is received.

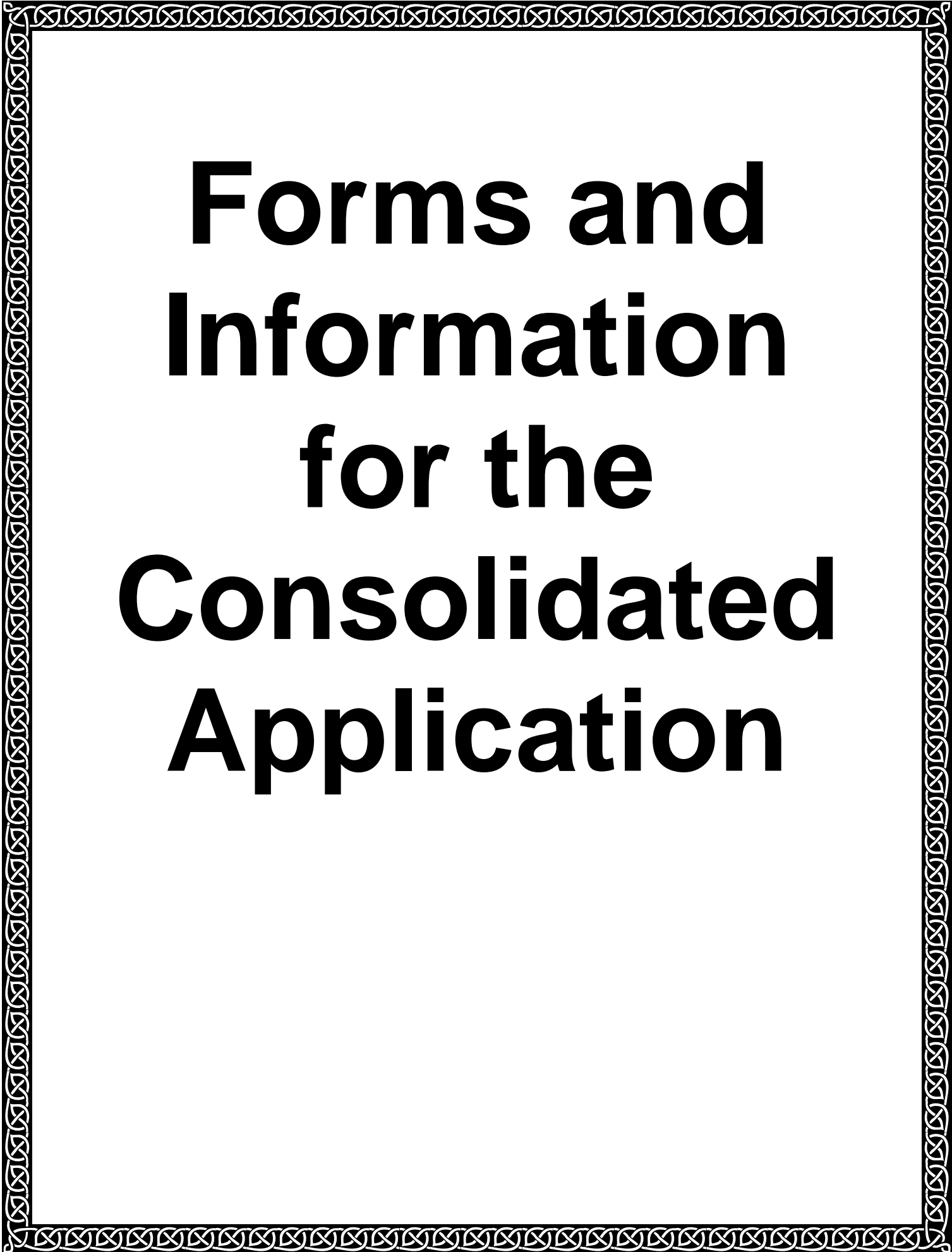
#### Reconsideration

Once a response is received from DPI staff, the person making the complaint may submit a reconsideration request in writing to the State Superintendent within thirty (30) days of the date of the Title director's response. The State Superintendent will issue a final decision within thirty (30) days of the request for reconsideration.

#### Other Formal Dispute Resolution Procedures

Rules regarding dispute resolution between a school district and DPI regarding state or federal funds are outlined in chapter 67-22-01 of the North Dakota Century Code.





# **Forms and Information for the Consolidated Application**

North Dakota Department of Public Instruction  
Dr. Wayne G. Sanstead, State Superintendent  
600 E. Boulevard Avenue, Dept. 201  
Bismarck, ND 58505-0440

## **Submission of Title I Private School Information on the STARS**

For the 2006-2007 school year, there is a significant change as to how district personnel will submit private school information, through the consolidated application, to the North Dakota Department of Public Instruction (NDDPI).

Last year, the consolidated application process was completed electronically. However, there were several additional forms pertaining to private school services that had to be submitted by hard copy. These forms have now all been incorporated into the electronic consolidated application process.

The federal Title programs consolidated application is the second report that will be available on the newly developed **STate Automated Reporting System (STARS)**. The STARS replaces the former Online Reporting System (ORS).

The consolidated application report will not be ready to complete electronically until April 19, 2006. The electronic information that will be completed on the STARS, that are part of the consolidated application, include:

- Narrative information describing the private school Title I program
- Information regarding Title I staff assigned to the private school
- Worksheet to determine equitable set-asides for private schools
- Affirmation of Consultation Form
- Private school Title I budget

The public school district should generate a screen print and have the private school officials review the completed private school portion of the consolidated application after it has been inputted on the STARS.

This electronic process does not allow signatures; however, the law still requires private school representatives to sign off on the Consultation Form. It is the responsibility of the district personnel to keep signature documentation on file.

It is very important to remember NOT to click on the submit button until your consolidated application is in approvable form as indicated by your Title I contact person.

District \_\_\_\_\_

## Worksheet Title I Equitable Services

1. Instructional Program(s) Reservation (i.e. summer school)

In **participating** public school attendance areas:

# of Private School Children  
from low-income families

Total # of Children  
from low-income families

\_\_\_\_\_ ÷ \_\_\_\_\_ = \_\_\_\_\_ Proportion of Reservation

\_\_\_\_\_ Proportion of Reservation x \$ \_\_\_\_\_ Reservation = \$ \_\_\_\_\_ for Equitable Services

2. Parental Involvement Reservation

In **participating** public school attendance areas:

# of Private School Children  
from low-income families

Total # of Children  
from low-income families

\_\_\_\_\_ ÷ \_\_\_\_\_ = \_\_\_\_\_ Proportion of Reservation

\_\_\_\_\_ Proportion of Reservation x \$ \_\_\_\_\_ Reservation = \$ \_\_\_\_\_ for Equitable Services

3. Professional Development Reservation

(Excluding Professional Development requirements for program improvement)

In **participating** public school attendance areas:

# of Private School Children  
from low-income families

Total # of Children  
from low-income families

\_\_\_\_\_ ÷ \_\_\_\_\_ = \_\_\_\_\_ Proportion of Reservation

\_\_\_\_\_ Proportion of Reservation x \$ \_\_\_\_\_ Reservation = x \$ \_\_\_\_\_ for Equitable Services

4. 5% Set aside for Teacher Quality (i.e. professional development at private school)

In **participating** public school attendance areas:

# of Private School Children  
from low-income families

Total # of Children  
from low-income families

\_\_\_\_\_ ÷ \_\_\_\_\_ = \_\_\_\_\_ Proportion of Reservation

\_\_\_\_\_ Proportion of Reservation x \$ \_\_\_\_\_ Reservation = x \$ \_\_\_\_\_ for Equitable Services

## Title I Private School Information

### General Information

Number of Students Participating \_\_\_\_\_

Check the method of delivery services to nonpublic school students.

- Students are served at the nonpublic school
- Students are transported to the nearest public school
- Students are transported to another site other than the public school
- Not participating

Briefly describe your Title I program.

### Staff Information

Name of Staff Member	Email Address	FTE Title I	New (Y/N)	Hours Reading	Grades Served Reading	Reading Credential Number	Hours Math	Grades Served Math	Math Credential Number	Other
										<input type="checkbox"/>
										<input type="checkbox"/>
										<input type="checkbox"/>
										<input type="checkbox"/>
										<input type="checkbox"/>

Define "Other" if checked.

North Dakota Department of Public Instruction  
 Dr. Wayne G. Sanstead, State Superintendent  
 600 E. Boulevard Avenue, Dept. 201  
 Bismarck, ND 58505-0440

## Title I Budget for Private School Buildings

District				
School Building				
Building Allocation	Carry Over Allocation	Parent Involvement Set-Aside	Other Equitable Set-Asides	Total Building Allocation
Object Codes		Title I ( a )	Title I Parent Involvement ( b )	Other Equitable Set Asides ( c )
<u>Salaries</u>				
110	Professional			
120	Non-Professional			
200	Benefits			
300	Purchased Professional & Technical Services			
400	Maintenance			
580	Travel			
600	Materials/Supplies			
730	Equipment >\$750/unit			
800	Dues/Memberships/Registration			
810	Fees			
900	Indirect Costs			
Unobligated				
Subtotal				
Total				
Private School Representative Signature			Date	
District Coordinator Signature			Date	
Authorized Representative Signature			Date	

Must be submitted to the State Title I office before the consolidated application can be approved.

## Addendum to the Title I Final Financial Report For Private School Services 2005-2006

Title I law requires LEAs to provide eligible private school children with Title I educational services or other benefits that are equitable to those provided to eligible public school children.

Title I funds are allocated on the basis of poverty. Services provided to private school students should reflect the minimum allocation amount generated. When the public school district submits the Title I final financial report, if any Title I private school funds are remaining, the district must issue the balance of these funds as carryover funds to the private school for the subsequent school year.

<b>School District</b>						
Object Number	Category			Approved Private School Budget	Total Expenditures for Fiscal Year-to-Date	Remaining Balance of Approved Amount
100	Salaries	110	Professional Salary			
		120	Non-professional Salary			
200	Benefits					
300	Purchased Professional and Technical Services					
430	Maintenance					
580	Travel					
600	Materials/Supplies					
730	Equipment > \$750					
800	Dues, Memberships, Registration					
900	Indirect Costs					
	Unobligated Set Asides					
<b>Totals</b>						

**Certification:**

I certify to the best of my knowledge and belief that this report is correct and that all expenditures are for the purposes set forth in the program application.

Signature of Authorized Representative	Date
Signature of Business Manager	Date
Signature of Private School Representative	Date

**TITLE I TARGETED ASSISTANCE MONITORING CHECKLIST  
 (Revised for Private Schools)**

Name of LEA	Program Review Date	
LEA Address		
City	State	Zip Code
LEA Superintendent		

***Title I – General Compliance Areas***

Area Of Compliance	Supporting Documentation	Compliance Status		Comments
		YES	NO	
<b>Certification</b>				
1a. The board of education has named an authorized representative for Title I.  The meeting was held on _____	Include minutes from meeting authorizing a representative.			
1b. The board of education has approved the consolidated application of which Title I is a part. The meeting was held on _____	Include minutes from meeting approving the consolidated application. Cross check dates with the Consolidated Application.			
<b>Financial Management (GEPA 442) EDGAR</b>				
2a. Accurate documentation of expenditures is being maintained at the LEA for Title I.  2b. Audit findings have been addressed.  *School districts must be audited at least every two years <u>except</u> those districts with less than 100 enrolled students, with less than \$100,000 of annual receipts. Those districts may submit a report to the State Auditor that contains the financial information required by the State Auditor. NDCC 54-10-14. Contact person at the State Auditor's office is Augie Ternes at (701) 328-9505.	a. Date of most recent audit _____  b. Name of auditor or audit firm performing the audit _____  c. Check the nature of the audit: <input type="checkbox"/> Financial only. <input type="checkbox"/> Compliance with program regulations. <input type="checkbox"/> Combination of financial and compliance.  d. Evidence of audit corrections.			
3. Purchase orders and invoices are properly coded to Title I.	Must include randomly selected purchase orders and invoices for Title I coded to the proper object code, title, and FY funding. Dates must be after July 1.			
4. Purchases are appropriate expenditures for meeting the consolidated plan.	Evaluating purchase orders. Check: Coded to appropriate Title. Date after July 1. Appropriate expenditure.			
5. The inventory of equipment, with a value of \$750 or more and a useful life of more than one year, meets the management requirements of EDGAR as described in the General Requirements for Federal Programs published by the Department of Public Instruction.	Evaluating the current Title I inventory. Inventory record must include:  Description, cost, serial number, date of purchase, and location.			
6. Materials, supplies, and equipment purchased with Title I funds are labeled as purchased with federal funds.	Title I labels must be checked and affixed to all non-consumable purchases.			

Area Of Compliance	Supporting Documentation	Compliance Status		Comments
		YES	NO	
<b>Parent Notification</b>				
7. For any school receiving funds under this part, the LEA has documentation showing they've notified the parents of each student that parents may request, and the agency will provide the parents upon request, information regarding the professional qualifications of the student's classroom teachers.  Requirement to notify parents if students are taught for four continuous weeks by a teacher that is not a "highly qualified" teacher has been relayed to parents.	Must include documentation of correspondence that was sent to parents regarding these 2 issues.			
8. The LEA has informed parents and community members of the District/School report cards and has provided an opportunity for individuals to review these reports.	Must include documentation of method that was used to inform parents of the availability of the report card information.			
<b>State Assessment</b>				
9a. Parents of all students have received <u>SCHOOL</u> information regarding the results of state assessments administered.	Must include documentation that: 1. student results and 2. School Adequate Yearly Progress (AYP) reports were provided to parents and community members.			
9b. Parents of all students have received <u>DISTRICT</u> information regarding the results of state assessments administered.	Must include documentation that: 1. District Adequate Yearly Progress (AYP) reports were provided to parents and community members.			
9c. Parents of all students in non-Title I buildings have received <u>SCHOOL</u> information regarding the results of state assessments administered.	Must include documentation that: 1. student results and 2. School Adequate Yearly Progress (AYP) reports were provided to parents and community members.			
<b>Home Education</b>				
10. Home education families were contacted for participation in the Title I program.	Must include documentation of written communication, meetings, and or phone conversations. Obtain a list of all Home Education Students.			
<b>Teacher Quality</b>				
11. The LEA can document that all teachers supported in a Title I program hired after the first day of the first school year following the date of enactment are "highly qualified," which for new teachers means certified by the state (including alternative routes to state certification), holding at least a bachelor's degree, and passing the PPST/Praxis I.	Monitor must verify employment date of teachers working in a Title I program who were hired after the first day of school and review documentation that shows these teachers have taken and passed the PPST/Praxis I.			
12. The LEA is utilizing the 5% teacher quality setaside mandated in the Title I regulations to ensure that all teachers are highly qualified by the end of the 2005-2006 school year.	Monitor needs to verify what activities are being funded with the 5% setaside for teacher quality and ensure that these funds are used to help unqualified teachers in core subject areas to meet the federal guidelines. There needs to be evidence of a needs assessment to address teacher deficiencies.			
<b>Private School Involvement (CFR 200.10-17)</b>				
13. Private school officials were contacted and consulted regarding the planning, design, implementation and participation in the Title I program.	May include documentation of meetings, copies of correspondence/information exchanges between LEA and private school officials.			
14. Expenditures and services provided to private school children must be equitable in comparison to the services provided to public school children.	May include itemized budget expenditures, class schedules, participation lists, needs assessment worksheets, etc.			
15. All participating private school children are residents of an eligible school attendance area of the LEA for Title I.	May include documentation of residency for participating private school children.			
16. The private school components of Title I are administered by and under the Control of the LEA.	Must include evidence of LEA administrative, financial, and program management control.			



Area Of Compliance	Supporting Documentation	Compliance Status		Comments
		YES	NO	
Private School Involvement (continued)				
17. Title I services, materials, and equipment are used for secular, neutral and non-ideological instruction.	Must include review of materials, supplies and overall program services.			

**TITLE I**  
*Helping Disadvantaged Children Meet High Standards*  
*Program Review*

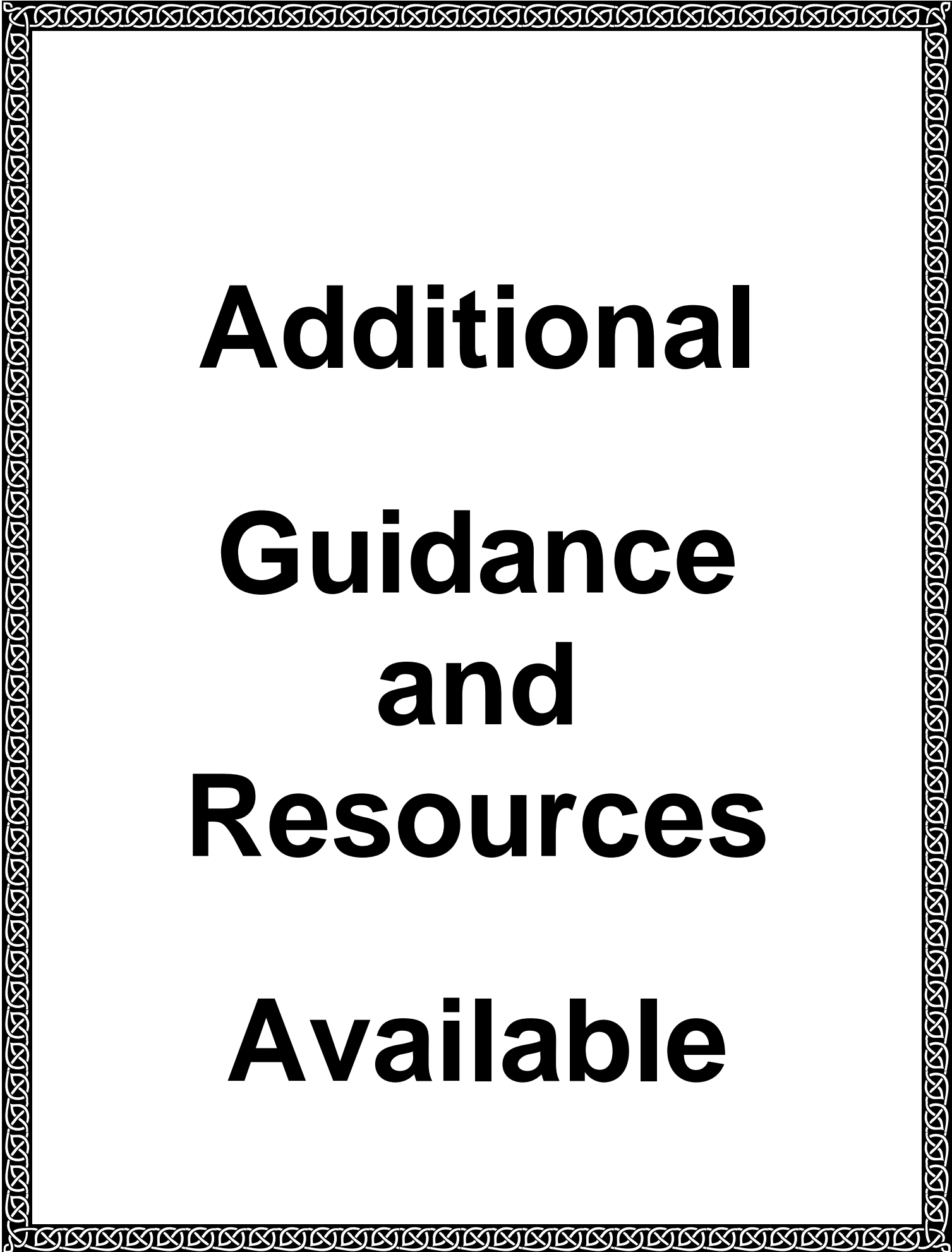
Area Of Compliance	Supporting Documentation	Compliance Status		Comments
		YES	NO	
<b>Title I Aides/Paraprofessionals</b>				
1. Title I instructional aides work under the direct Supervision of a Title I teacher who has the primary responsibility for providing supplemental instructional services to eligible children.	Reference Department policy on teacher aides/paraprofessionals. Aides may not have their own caseload of students.			
2. Any aides/paraprofessionals hired after January 8, 2002 must either have: <ol style="list-style-type: none"> <li>1. completed at least two years of study at an institution of higher education,</li> <li>2. obtained an associate's or higher degree, or</li> <li>3. met a rigorous standard of quality established at the local level, which includes an assessment of math, reading, and writing.</li> </ol>	Monitor must verify employment date of all Title I aides and review documentation that demonstrates one of the three requirements have been met for those hired after January 8, 2002.			
3. Title I aides/paraprofessionals duties are aligned to the new law, which includes: <ol style="list-style-type: none"> <li>1. providing one-on-one tutoring for eligible students only if the tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher;</li> <li>2. assisting classroom management (in a schoolwide setting only);</li> <li>3. providing computer lab assistance;</li> <li>4. conducting parental involvement activities; or</li> <li>5. serving as a translator.</li> <li>6. provide support in a library or media center. In a targeted assistance program, any services provided by Title I-paid aide would have to be supplemental and target identified Title I students; and</li> <li>7. provide instructional support services under the direct supervision of a teacher (in a targeted assistance program Title I paid aides must be under the direct supervision of a Title I teacher).</li> </ol>	Monitor needs to witness Title I aides assuming duties they have been prescribed and verify that the responsibilities are aligned to one of the five allowable duties defined in the law.			

Area Of Compliance	Supporting Documentation	Compliance Status		Comments
		YES	NO	
<b>Targeted Assistance Schools</b>				
4. Title I personnel have a schedule of fixed daily duties. Title I staff who are paid from more than one source maintain a current time and effort log.	Schedules must be provided for teachers or staff with fixed daily duties. Must include log detailing dates and hours worked and activities performed during those hours.			
5. Selection of participants was based on educationally related, objective, uniformly applied criteria given to all students at each grade level.	Must include worksheets that document the criteria used at each grade level.			
6. Economically-disadvantaged, learning disabled, or LEP and migrant students served in Title I are selected on the same basis as all other students.	Must include selection worksheets that document criteria used at each grade level.			
7. Students who moved into the district after the student selection process was completed were selected in the same way and ranked with other eligible children prior to receiving services.	Must include class lists and selection worksheets ranking students in priority order.			
8. Title I Caseload of Students. An average caseload of students for Title I teachers is 25-35 students. In larger districts, the caseload is often higher. Over 45 students is too many, the number needs to be manageable.	Must have a portfolio on each student served documenting their progress. Caseload of students _____			
9. Instructional method of service delivery being used. (please circle)  In Class      Pullout      Combination	Describe service delivery model that is utilized.			
10. Services, in Targeted Assistance Schools, are provided only to eligible children.	Must include worksheets that document the criteria used to select students for Title I services.			
11. Title I services are supplementary and do not supplant state and local support.	Describe how services received by Title I students are above and beyond the primary instruction received by the regular classroom teacher.			
12. Describe the procedures that ensure consultation with classroom teachers.	May include documentation of meetings, written communication, etc.			
13. Documentation exists to support an absence of services to any child in greatest need who is not receiving Title I services.	Must include waivers signed by parents refusing services or waivers signed by teacher, with parents' knowledge, indicating success in the classroom. Reasons for not serving students should be indicated on the selection worksheet.			
14. Title I personnel employ scientifically-based research strategies in teaching practices.	Review teaching methods to verify whether scientifically-based research strategies are being employed (i.e., vocabulary instruction, repeated oral reading, comprehension instruction).			
<b>School Improvement</b>				
15. A review of the Title I program is conducted annually. The Annual review was held on _____.	Describe the annual review process, which ensures that the annual review requirements have been met. Must include documentation of meetings, written communications, etc.			
16. Annual review results are shared with parents of participating children, teachers, and other appropriate staff, including principals.	Must include copies of reports summarizing evaluation results, local annual review minutes, meeting agendas, board reports, etc.			

Area Of Compliance	Supporting Documentation	Compliance Status		Comments
		YES	NO	
17. A review of each Title I student's progress is conducted to assess whether students are making adequate yearly progress. A minimum of three assessment criteria is used to measure student progress.	Documentation must include basis of review and evaluation of progress. Must include student portfolios/folders documenting three methods of assessment that are used and method used to send informal form home to parents.			
<b>Parent Involvement</b>				
18. a. The LEA has a school district written policy that involves parents in the development of the Plan.  <b>Multiple Attendance Area Districts Only</b>  b. Each individual school, which receives Title I funds, has a written parental involvement policy, jointly developed with and distributed to parents. (Districts that have multiple attendance areas must have individual school parent involvement policies.)	Must include written policy. Must include description of distribution procedures.  Must include copy of policy.			
19. An annual parent meeting was held for all parents of participating children for the purposes of explaining: a. Title I programs and activities; b. Their right to be involved; c. School performance profiles and the child's individual student assessment results. Date of parent meeting _____.	Must include minutes of meeting. May include meeting notice, description of distribution of notice, written agenda, and list of people attending.  May include written notification letters, documented phone calls, and schedule of parent-teacher conferences.			
20. The Title I program provides: a. Opportunities for training parents to become partners with the school in promoting the education of the child at school and at home; and b. Information about methods parents can use at home to complement the child's instruction.	May include evidence of parent training session, copies of handouts or newsletters, evidence of workshop/conference opportunities, and parent-teacher conference documentation			
21. The school-parent compact describes: a. The school's responsibility to provide a high quality curriculum that enables all children to meet the State's performance standards; b. Ways each parent will be responsible for supporting their children's learning; and c. The importance of ongoing communication between teachers and parents.	Will be determined by reviewing the parent compact.			
22. An annual assessment of parent involvement in the Title I program is conducted in consultation with parents.	Must include documentation of assessment of procedure. May include copies of surveys used to gather parent input.			

### Signatures

Title I Director	Monitor
------------------	---------



**Additional  
Guidance  
and  
Resources  
Available**

U. S. Department of Education

**Title I**  
**Services to Eligible**  
**Private School Children**

*Non-Regulatory Guidance*

October 17, 2003

To access a copy of this guidance, log on to:  
[www.ed.gov/programs/titleiparta/psguidance.doc](http://www.ed.gov/programs/titleiparta/psguidance.doc)

**DRAFT**  
**EXAMPLE OF A TIMELINE FOR LEA CONSULTATION**  
**WITH PRIVATE SCHOOL OFFICIALS \***

<b>MONTH</b>	<b>LEA ACTIVITY</b>	<b>EXPLANATION</b>
November/December Prior to next school year	Obtain complete list of all private schools with students who are residents of the LEA.  Meet with private school officials to review timeline and consultation process. Establish a consultation calendar and poverty data collection procedures.	List serves as basis for asking all private school officials if they want their eligible students to participate in Title I the next school year. See §1120(a) & (c).
December thru February Prior to next school year	Obtain from principals or a central office serving a group of private schools the following poverty data (as appropriate) on private school students*: <ul style="list-style-type: none"> <li>▪ Free and reduced priced lunch (LEA must use, if available)</li> <li>▪ Poverty survey that parents complete (LEA must extrapolate)</li> <li>▪ Alternative poverty data such as scholarships, TANF, Medicaid, etc.</li> <li>▪ Proportionality</li> </ul> * Request only addresses and grade levels.	Private school students from low-income families who live in Title I participating public school attendance areas generate funds for instructional services.  See §1120(c)(1) & §200.78.
February/March Prior to next school year	Match addresses of private school students from low-income families to participating public school attendance areas.  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.  Meet with private school officials to discuss poverty data results, amount of estimated instructional funds generated, and determine if funds will be pooled or not, or a combination of both options.	Required in §1120(a)(4).  Required in §1120(b)(1) & (2) and §200.64(a)(2)(ii).

MONTH	LEA ACTIVITY	EXPLANATION
<p>April/May Prior to next school year</p>	<p>Determine the multiple educationally related criteria 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>Select for Title I services those students most at-risk from these lists.</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 and the equitable share of funds reserved for district wide instructional activities for public elementary and secondary school students.</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 <b>current year's</b> program using the standards previously agreed upon last year. After appropriate consultation, make modifications to next year's Title I program, if annual progress has not been met.</p>	<p>Multiple educationally related criteria required under §1115(b). Required in §200.62(b).</p> <p>Required in §1120(b).</p> <p>Required in §200.62(b)(2).</p> <p>Required in §1120(b)(1) and §200.63(a) and (b).</p> <p>Required in §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>

<b>MONTH</b>	<b>LEA ACTIVITY</b>	<b>EXPLANATION</b>
<p>May/June Prior to 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 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 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 Board 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. Required in §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. Required in §1120(b) and §200.63.</p> <p>Required in §1120(b)(4) and §200.63(e).</p> <p>These actions ensure that programs will begin at the start of the school year.</p> <p>See §1120(a)(3) and §200.62(a)(1).</p>



<b>MONTH</b>	<b>LEA ACTIVITY</b>	<b>EXPLANATION</b>
August Prior to beginning of school year	Report on readiness of Title I program for private school participants to private school officials.	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).
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 provided, and names of Title I teachers.  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.  Implement professional development and parent involvement activities based on previous spring's consultation.	See §1120(a)(3) and §200.62(a)(1).  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.	Required in §1120(b)(2) and §200.63(c).
* Responsibilities of private school officials who want services for their eligible students: participate in consultation; provide list of addresses and grade levels of children from low-income families; provide list of names, addresses, and grade levels of children who meet educational eligibility criteria; suggest ideas, program designs, and modifications that meet the needs of their eligible children, teachers, and families; and provide a dedicated space, if appropriate.		
<b><i>This is not an official Department of Education document. It is provided only as an example.</i></b>		