Discussion on how to address services for nonpublic students

Jane Blanton • Suzanne Dillow
Illinois State Board of Education
Consultation

Sec. 1120(b) of the No Child Left Behind and Sec. 200.63 of the Title I regulations require that timely and meaningful consultation occur between the local educational agency (LEA) and private school officials prior to any decision that affects the opportunities of eligible private school children, their teachers, and their families to participate in Title I programs, and shall continue throughout the implementation and assessment of activities.
How do you handle consultation with the nonpublic schools in your district?
10 Consultation Topics

1. How the LEA will identify needs
2. What services the LEA will offer
3. How and when the LEA will make decisions about delivery of services
4. How, where, and by whom the LEA will provide services
5. How the LEA will academically assess
6. Size and scope of services
7. Method of sources of data to determine number of students
8. Equitable services the LEA will provide to teachers and families
9. Service delivery mechanisms
10. Consideration and analysis of the views of the private school officials about third party providers
How does your district document correspondence with the nonpublic schools?
# Log of LEA Contacts with Private School Officials

**LEA**

**Title I Coordinator**

Complete an entry for each conversation you had with private school officials to create an accurate log of contacts.

<table>
<thead>
<tr>
<th>Private School</th>
<th>Phone</th>
<th>Phone Contact date/time/name</th>
<th>Purpose of Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Equitable Participation

• To ensure equitable participation, the LEA must assess, address and evaluate the needs of private school students and teachers; spend an equal amount of funds per student to provide services; provide private school students and teachers with an opportunity to participate in activities equivalent to the opportunity provided public school students and teachers; and offer services that are secular, neutral and non-ideological.
What method does your district use to determine low income students from the nonpublic schools?
Income Determination Form

• Family address: ________________________________________

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

• Family size and monthly income chart

• Is your family qualified for food stamps? ___yes  ___no

• Are you receiving Temporary Assistance to Needy Families (TANF): ___yes  ___no

• Please return this form to: [insert name and contact information]
Family Survey Form

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

Family size and annual gross income level chart
Is your family income less than the amount on the chart on the line beside your family size? ___ yes ___ no
Is your family qualified for food stamps? ___ yes ___ no
Are you receiving Temporary Assistance to Needy Families (TANF)? ___ yes ___ no

Please provide the following:
Address: ___________________________________________________________
Public school district in which you reside: _____________________________
Grade levels of your children: _____________________________________

Please return this form to [insert name and contact information]
Family Income Eligibility Form

Families Who Meet the Poverty Criterion

Please use one form for each public school district. Duplicate as necessary.

Name of Private School__________________________________________________
Public School District____________________________________________________

Please provide below the grade levels, addresses (including zip codes) of your students whose families meet the poverty criteria of [insert here any of the poverty criterion used; e.g. enrollment in the USDA’s free and reduced-price lunch program]. Do not provide the names of the families or students. More than one grade level can be listed on the form as long as there is a separate form for each school district.

Grade Levels  Addresses Including Zip Codes
1.  
2.  
3.  


Does anyone have any questions or concerns relating to the nonpublic equitable share in Targeting Step Four of the NCLB Application?
Equitable Share Formula

Public Low Income + Non-Public Low Income = Total Low Income Students Served

3129 + 146 = 3275

Non-Public Low Income divided by Total Low Income Served = proportionate share for non-public low income (6 decimal places)

146 / 3275 = .044580

.044580 x Set-aside amount = private school share
### Targeting Step 4

**Set Asides**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private School Noninstructional Costs</td>
<td>0</td>
</tr>
<tr>
<td>Parent Involvement (District Wide)</td>
<td>1500</td>
</tr>
<tr>
<td>Prior Yr Unexpended Parent Involvement</td>
<td>0</td>
</tr>
<tr>
<td>Total Amount for Parent Involvement</td>
<td>1500</td>
</tr>
<tr>
<td>Administration</td>
<td>2309</td>
</tr>
<tr>
<td>Preschool (District Wide)</td>
<td>0</td>
</tr>
<tr>
<td>Homeless Children</td>
<td>250</td>
</tr>
<tr>
<td>Professional Development Due to Status (Only 10%)</td>
<td>26847</td>
</tr>
<tr>
<td>Professional Development for Non Status Activities</td>
<td>24526</td>
</tr>
<tr>
<td>Professional Development Prior Year Unspent Funds</td>
<td>0</td>
</tr>
<tr>
<td>Limited English Proficient (LEP)</td>
<td>250</td>
</tr>
<tr>
<td>Supplemental Educational Services</td>
<td>0</td>
</tr>
<tr>
<td>Neglected/Delinquent Children</td>
<td>0</td>
</tr>
<tr>
<td>Transportation for School Choice</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total Distribution Amount:</strong> $220,842</td>
<td></td>
</tr>
<tr>
<td><strong>Minimum Per Pupil Amount (if applicable):</strong> 0</td>
<td></td>
</tr>
</tbody>
</table>
Targeting Step 4 cont.

### Estimated Number of Students Who Will Participate

<table>
<thead>
<tr>
<th>Attendance Center</th>
<th>Approved Schoolwide</th>
<th>Not Served</th>
<th>Public Low Income</th>
<th>NonPublic Low Income</th>
<th>Low Income Percent</th>
<th>Attendance Center Allocation</th>
<th>Per Pupil Amount</th>
<th>NonPublic Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011 - STE MARIE ELEM SCHOOL</td>
<td>✓</td>
<td></td>
<td>50</td>
<td>1</td>
<td>54.35 %</td>
<td>49995</td>
<td>$980</td>
<td>$980</td>
</tr>
<tr>
<td>2002 - NEWTON ELEM SCHOOL</td>
<td>✓</td>
<td></td>
<td>284</td>
<td>5</td>
<td>46.25 %</td>
<td>170847</td>
<td>$591</td>
<td>$2,955</td>
</tr>
<tr>
<td>1003 - JASPER CO JR HIGH</td>
<td>✓</td>
<td>✓</td>
<td>74</td>
<td>1</td>
<td>41.57 %</td>
<td>0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>0001 - NEWTON COMM HIGH SCHOOL</td>
<td>✓</td>
<td>✓</td>
<td>140</td>
<td>0</td>
<td>32.86 %</td>
<td>0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>334</td>
<td>6</td>
<td></td>
<td>$220,842</td>
<td></td>
<td>$3,935</td>
</tr>
<tr>
<td>Difference</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Comments

We do not serve our junior high or high school students. This is due to the fact that as a district, we choose to concentrate services within the elementary grades, where research shows the most gains may be made through supplemental services. We use district funds to provide interventions for at risk students at the junior high and high school level.
### Private School Share

Are private, nonprofit schools participating in this grant program?* If yes, complete this page. If no, save page and continue to next page.

This information is pulled from the Targeting Step 4 page.

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The number of low-income private school students in participating public school attendance areas</td>
</tr>
<tr>
<td>2</td>
<td>The number of low-income public school students in participating public school attendance areas</td>
</tr>
<tr>
<td>3</td>
<td>Total number of low-income students in participating public school attendance areas (Line 1 + Line 2)</td>
</tr>
<tr>
<td>4</td>
<td>Private school proportion of low-income students (Line 1/Line 3)</td>
</tr>
<tr>
<td>5</td>
<td>The districtwide Parent Involvement reservation from Targeting Step 4</td>
</tr>
<tr>
<td>6</td>
<td><strong>Equitable private school share of Parent Involvement reservation</strong> (This amount should be entered in Function Codes 3000 on the Budget Detail page) (Line 4 x Line 5 rounded to whole dollar)</td>
</tr>
<tr>
<td>7</td>
<td>The amount reserved on Targeting Step 4 for professional development activities not related to improvement status</td>
</tr>
<tr>
<td>8</td>
<td><strong>Equitable private school share of Professional Development reservation</strong> (This amount should be entered in Function Codes 3000 or 4000 on the Budget Detail page as appropriate) (Line 4 x Line 7 rounded to whole dollar)</td>
</tr>
</tbody>
</table>

*Required field
How to Identify Eligible Private School Students for Title I Services

• The LEA is required to use multiple, educationally related, objective criteria in selecting children to participate in the Title I program.
• This is determined through consultation with the private school officials.
• The LEA must select private school children who are failing, or most at risk of failing, to meet high student academic achievement standards.
• Some educationally related criteria that an LEA may use to identify the at-risk private school children for Title I services may include:
  – Achievement tests
  – Teacher referrals and recommendations based on objective educationally related criteria
  – Grades
How does your district identify eligible nonpublic Title I students?
Planning the Program

• Desired Outcomes: By the end of today’s meeting, participants will have reached consensus on their recommendations for how [insert LEA name] will provide services to eligible private school children for the [insert school year].
• Welcome and recap of previous discussions.
• Setting the stage—purpose of meeting.
• Brainstorm ways Title I services could be delivered.
• Reduce program options by selecting top 5.
• Review options to determine if they meet participants’ needs.
• Closure: reaching consensus and selecting the best service delivery model.
• Next steps, Issues and Meeting dates.
Discuss the process you use when planning with the nonpublic schools.
Materials and Equipment Requirements

Sec.200.67:
The LEA must keep title to and exercise continuing administrative control of all property, equipment, and supplies that the LEA acquires with funds under Subpart A for the benefit of eligible private school children.

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

The LEA must ensure that the equipment and supplies placed in a private school are used only for Title I purposes; and can be removed from the private school without remodeling the private school facility.

The LEA must remove equipment and supplies from a private school if the LEA no longer needs the equipment and supplies to provide Title I services; or removal is necessary to avoid unauthorized use of equipment or supplies for other than Title I purposes.

The LEA may not use funds for repairs, minor remodeling, or construction.
How do you keep track of materials and equipment in the nonpublic schools?
Characteristics of Services

• Services, materials, and equipment must be secular, neutral, non-ideological and supplemental in nature, not supplanting what the private school would otherwise provide absent the federal education service.

• Types of services can include targeted, assisted pullout direct instruction, extended day services, family literacy programs, counseling, tutoring, computer assisted instruction with a teacher, early childhood, and professional development.
What type of services are you providing to nonpublic students?
Program Evaluation

• Non-public School Title I Program Evaluation
• School ________________________ Visit Date ____________________
• Non-public School LEA
Representative___________________ Representative_______________
• Non-public LEA
Signature________________________ Signature____________________
• Current Enrollment____________
• Income Verification Method(s)  Survey  F/R Lunch
   Other ______________________
• Enrollment/Family income documentation Notes:
• Current Year Title Program Participation (Check all that apply)
  Title I  Title II A (Professional Development)
  Title IA-Improving Academic Achievement
  Participants
  School District resident Parental Consent
  Met eligibility requirements
  K5 or older, under 18 at start of current school year
• Services Provided (Check all that apply)
  School day instruction Extended day instruction
  Professional development Parental involvement
  Summer school Counseling
• Other
Program Evaluation

- **Services**
  - **Teacher:** Hours per week:  
    Assigned to school:  
    Student Contact:  
    # Students Served:  
  - **Paraprofessional:** Hours per week:  
    Assigned to school:  
    Student Contact:  
    # Students Served:  
  - **Counselor:** Hours per week:  
    Assigned to school:  
    Student Contact:  
    # Students Served:  

- **Check all that apply:**
  - No Title IA program materials or equipment under control of public school.  
  - School inventory of Title IA program materials and equipment maintained with locations where property is kept.  
  - All Title IA materials and equipment labeled “Property of LEA Title Programs”.  
  - All Title IA materials and equipment used by Title I students.  
  - Forms for requesting Title program expenditures on file.
Program Evaluation

• **Assessment**
  • Annual assessment of Title IA program
  • Are students meeting the agreed-upon standards for reading and math?
    □ Yes   □ No
  • If the answer is no, the Title IA program has failed to meet the annual progress target. Modifications to the program will include, but will not be limited to:
    Increased Title I teacher time.
    Implementation of Title I services for extended day or extended year, or both.
    Increased focus or time or both for specific grade levels, if need is demonstrated.
    Evaluation of supplemental materials for effectiveness in improving student academic achievement.
  • Other________________________________________________________
    ____________________________________________________________
Program Modifications

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

And

- Evaluation supplemental materials for effectiveness in improving student academic achievement;
- Also, the consultation process will include a review of the performance standards for program evaluation in the following year;
- The standards and progress measures will be modified as necessary.
How does your district evaluate and modify Title I programs in the nonpublic schools?
Resources

- Jane Blanton, ISBE  
  jblanton@isbe.net
- Suzanne Dillow, ISBE  
  sdillow@isbe.net
- www.isbe.net
- www.isbe.net/grants/html/np_partic.html
- http://www.ed.gov/about/offices/list/oii/nonpublic/index.html
- *Our forms today were taken from the USDE Nonpublic Toolkit.