

Chapter 5 - Private School

The local school district is responsible for planning, designing, and implementing the Title I program for private school children under the auspices of Title I of the *Elementary and Secondary Education Act* (ESEA), as amended by NCLB. In particular, Section 1120 of Title I, Part A, requires school districts receiving Title I funds to provide eligible children attending private elementary and secondary schools, their teachers, and their families with Title I services or other benefits that are equitable to those provided to eligible public school children, their teachers, and their families.

To ensure compliance with the entirety of this mandate, each school district must plan to provide full-school year programming, must consult with private officials in a timely and meaningful manner, and must allocate appropriate funding.

1. Consult

- a. Plan to conduct full school year programming.
- b. Have timely and meaningful consultation with private school officials;
 - i. Set up a schedule of regularly scheduled meetings (must have multiple meetings per year – suggest one per quarter);
 - ii. Establish a timeline for frequent on-site visits of the private school by public school administrator.
- c. Have an agenda for each meeting (law mandates the following areas must be covered);
 - i. What size and scope of services are to be offered to private, which must be based on or have at least considered the views of the private school officials. Services must be secular, neutral, and non-ideological. Types of services could include but are not limited to
 1. Instructional services
 2. Extended day services
 3. Family literacy programs
 4. Counseling programs
 5. Computer assisted instruction
 6. Home tutoring
 7. Instruction using take-home computers
 8. Professional development (secular in nature) targeted to help teachers better teach at-risk students.
 - ii. How will the district use data from private schools to determine the private school allocation based on the number of private school children from low income families residing in participating public school attendance areas (per Section 200.78): <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?type=simple;c=ecfr;cc=ecfr;sid=097a85a29c8352974a1532e4ad9269d8;idno=34;region=DIV1;q1=200.78;rgn=div8;view=text;node=34%3A1.2.2.1.1.1.158.76>
 - iii. How will eligible students be identified for programming (must use same criteria as in Targeted Assistance public school programs - low grades, low

screening scores, teacher observation, etc.)

- iv.** How will the district format programs to be offered to private school eligible students, staff and families, utilizing input from private school officials.
- v.** How and when will the district determine the format of delivery each year.
- vi.** How will the district plan to assess private school students and how the district will use results of that assessment to improve Title I instructional services (in accordance with Section 200.10 of the Title I regulations).
<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=fccf4b0e225d4105c3dcd8510c52bda&rgn=div8&view=text&node=34:1.2.2.1.1.1.149.10&idno=34>
- vii.** Review program (Title I) rules and regulations (including but not limited to):
 - a.** All programs for private school students must operate as Targeted Assistance programs.
 - b.** Fiscal requirements will not allow funds to flow directly to private school.
 - c.** All supplies, materials, and equipment remain the property of the public school and appropriate and accurate inventory records must be kept.
 - d.** Keep written notes of each meeting and share with private school officials.
NOTE: If the LEA disagrees with the views of the private school officials on the provisions of services through a contract, the LEA must provide the private school the reasons in writing why the LEA chooses not to use a contractor.
NOTE: It is the responsibility of the LEA to provide oversight, make decisions, control use of purchased materials, determine hiring of personnel, supervise third party contracts, evaluate and supervise Title I personnel and programs.

2. Allocate – Per Pupil Allocation

- a.** Collect data to be used to determine private school allocation.
- b.** Collect addresses for all private school students from the private school officials.
- c.** Collect low income information for private students by address from private school officials.
- d.** Sort addresses by the public school that serves that residential area - which will then:
 - i.** Identify the number of private students (for Program Specific, Targeting Step 1 page of e-grant application);
 - ii.** Identify the number of low income private students (for Program Specific, Targeting Step 1 page of e-grant application).
- e.** Calculate the allocation for all private schools serving students within the district residential area will be automatically on the Program Specific, Targeting Step 4 page of the e-grant application.
- f.** Distribute funds among the private schools based on the percent of low income private students attending each private school.
Example: If Targeting Step 4 page reflects 100 total low-income private students attending St. Mary, St. Paul and St. Thomas schools, generating \$7000 total allocation for private programming, but 50% of the low-income students attend St. Mary, 35% attend St. Paul and 15% of the low-income students attend St. Thomas – then 50% of the

allocation will go towards programming at St. Mary, 35% will go towards programming at St. Paul, and 15% will go towards programming at St. Thomas.)

- g.** NOTE: if private students, by virtue of their residential address, would have attended a public school that does not qualify for or receive Title I programming, then these students do not generate Title I funds for the private school.

3. Allocate – Additional Allocation Known as SET-ASIDE EQUITABLE SHARE

- a.** Private schools receive a percentage of the amounts set-aside by the district for parent involvement, professional development, and most items that might be placed under “Other” (such as summer school and salary differential) on the Program Specific, Targeting Step 4 page of the E-grant.
- b.** Parent Involvement: districts that receive a Title I allocation of \$500,000 or more are required to provide a percentage of this amount for private programming – in addition to the private per-student allocation.
- c.** To determine the Private School Parent Involvement Equitable Share:
 - i.** For this example, let the LEA current year allocation equal \$6,432,000.
 - ii.** The parent involvement 1% set-aside would be \$64,320.
 - iii.** From Program Specific Targeting Step Four, there are 2,500 low income public school students and 375 low income private school students residing in the attendance area.
 - iv.** Add the total of public and private low income students and you have a total of 2,875 low income students.
 - v.** Next, determine a ratio of public to private students ($375 / 2875 = .130435$) rounded to six decimal points.
 - vi.** The final step is to multiply the 1% set-aside of \$64,320 by the ratio (.130435), to reach the amount, \$8,390 in this example, of the parent involvement set-aside for parents of children attending private schools.
- d.** Professional Development: private schools are to receive an Equitable Share of the set aside for Professional Development as well. Previously, however, if the district was in status and required to set aside 10% for professional development to address areas of weakness as reflected by the State assessment, then private schools will only receive their Equitable Share of the amount set-aside that exceeds the mandated 10%. Now due to the NCLB waiver, private schools get an equitable share of all professional development funds set aside.

NOTE: Title I programs must not be staffed exclusively with paraprofessionals.

Paraprofessionals must be under the direct and immediate supervision of highly qualified teachers. Paraprofessionals must not determine the program of services; only highly qualified teachers can determine the program of services. However, highly qualified supervisory teachers do not have to be paid for with Title I funds.

Additional guidance is available through the Innovation and Improvement Division website (<http://www.isbe.net/grants/default.htm>).