



Title I Programming & Private Schools

Nonpublic Conference— April 2017
Nancy Oesterreich and Mitch Parrish



Agenda:

1. Funding & Eligibility

- How, Who, What, Why

2. Schoolwide vs. Targeted Assistance

- Public and Nonpublic programming

3. Allowable Uses of Funds

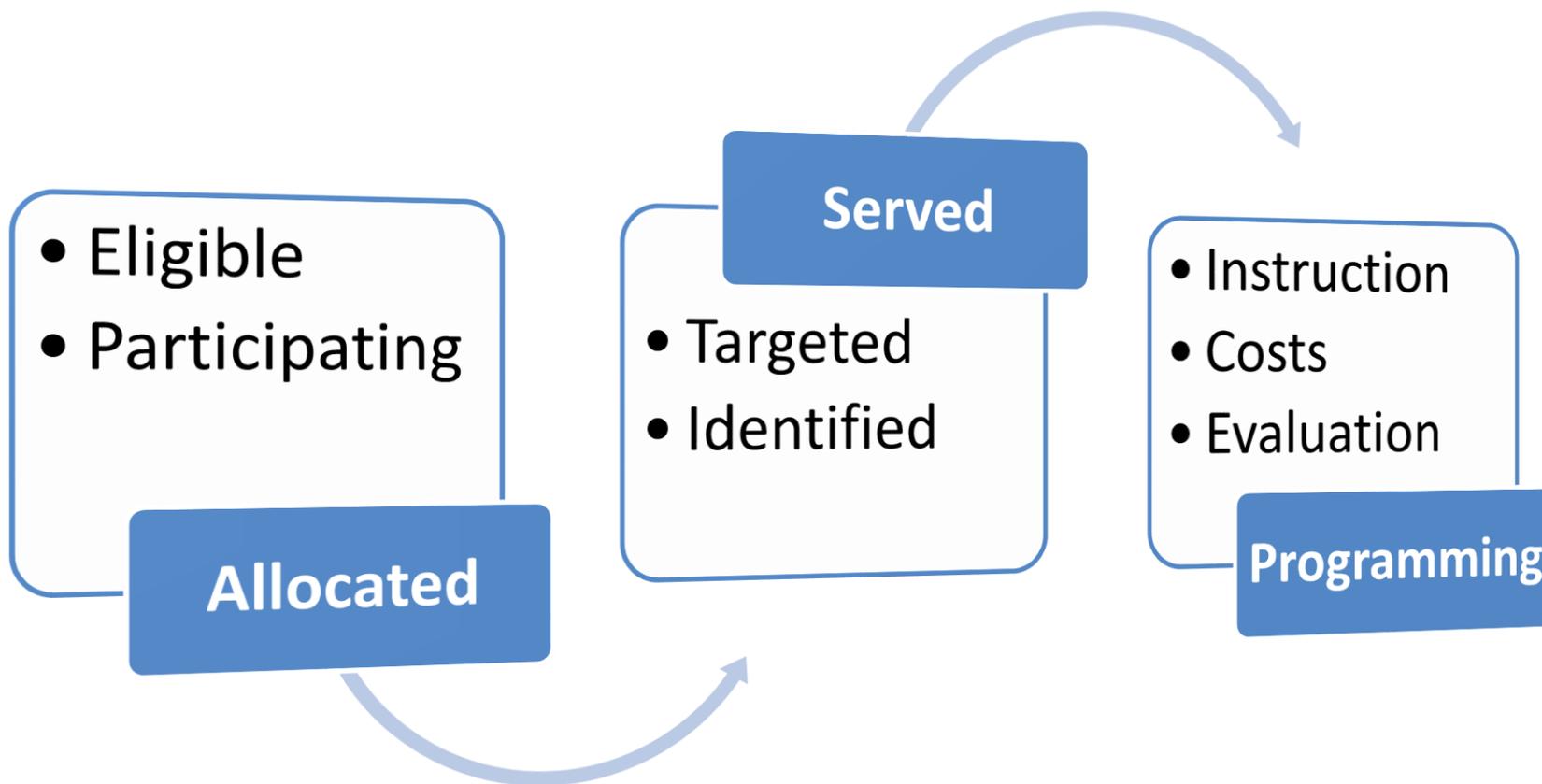
- Instruction, P.D., Parent Involvement

4. Program Delivery

- Pullout, push-in, vendors, pooling



Connect The Dots





Title I Allocations

- **Preliminary Eligibility** (released by ISBE)
 - December (dependent on USDE)
- **Projected Allocations** (released by ISBE)
 - June/July (dependent on USDE)
- **Carryover** (LEA Generated)
 - August/September
 - Waiver may be granted ONCE every 3 years
- **Final Allocation**
 - Generally October (dependent on USDE)



Private school Title I Allocations

- Equitable share is based on the **number of low-income students** attending nonpublic schools **regardless of where the schools are based**.
 - Based on Public school's determined Per Pupil amount (seen on Targeting Step 4)
 - Includes proportionate share of set-asides (Fy17)(Fy18 share taken from Total Available funds) **STILL IN DEVELOPMENT PHASE**



How do I determine low-income students in 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. _____



Application

- Input low income data
- Rank/Serve schools
- Set Asides
- Nonpublic allocations
- Nonpublic equitable shares
- Budget





Targeting Step 1

Overview	District Information	FFATA	Program Specific	Goals	Budget Pages	Page Lock Control
Targeting Step 1	Targeting Step 2	Targeting Step 3	Targeting Step 4	Private School Share	Schoolwide Programs	

Title I Targeting

[Instructions](#)

[NOTE: READ BEFORE IMPORTING - Data Import Instructions](#)

[Data Import Template](#)

Choose File No file chosen

Validate File

Step 1:

Enter the details for all attendance centers then click a save page button. Use most recent data for student counts. (Unduplicated Count)

Check the appropriate source box(es)

- FREE/REDUCED LUNCH
- TANF (formerly AFDC)
- MEDICAID
- Direct Certification

Month

Year



Please indicate below whether the numbers you will be entering will be based upon students enrolled in your district or students residing in your district.

- Enrollment Residing

Attendance Center	Select Category	Grade Span	Feeder Pattern Used	CEO	Grandfather or Waiver	Public Enrollment	Non-Public Enrollment	Public # Low Income	Non-Public # Low Income
0001 - SEYMOUR HIGH SCHOOL	High School	7-12	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
2002 - SEYMOUR ELEMENTARY SCHOOL	Elementary	P-6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Janet Allison, Funding and Disbursement Division. (217)782-5256



Targeting Step 2

Title I Targeting

[Instructions](#)

Application has been submitted. No changes are allowed.

Step 2:

If the totals are correct, select your choice below for ranking and click the 'Proceed to Ranking' button. Otherwise, [Click here to return to Step 1.](#)

Attendance Center	Feeder	Total Enrollment	Total # Low Income	Percent Low Income (Public & Nonpublic)	Percent Low Income (Public Only)
0001 - PAXTON-BUCKLEY-LODA HIGH SCHOOL	N	450	113	25.11 %	26.40 %
1002 - PAXTON-BUCKLEY-LODA JR HIGH SCH	N	377	120	31.83 %	32.86 %
2004 - CLARA PETERSON ELEM SCHOOL	N	327	162	49.54 %	51.83 %
2005 - PBL EASTLAWN	N	356	144	40.45 %	41.95 %
Prekindergarten Total		0	0	0 %	0 %
Kindergarten Total		0	0	0 %	0 %
Lower Elementary Total		0	0	0 %	0 %
Upper Elementary Total		0	0	0 %	0 %
Elementary Total		683	306	44.80 %	46.67 %
Middle School Total		377	120	31.83 %	32.86 %
Junior High School Total		0	0	0 %	0 %
High School Total		450	113	25.11 %	26.40 %
District Total*		1510	539	35.70 %	37.07 %

*The calculation of district low income percent does not include attendance centers with 'feeder' generated low income numbers.

Select one of the following choices for ranking:

Use Public and Nonpublic Values for Ranking

Use Only Public Values for Ranking



Targeting Step 3

Overview	District Information	FFATA	Program Specific	Goals	Budget Pages	Page Lock Control
Targeting Step 1	Targeting Step 2	Targeting Step 3	Targeting Step 4	Private School Share		Schoolwide Programs

Title I Targeting

[Instructions](#)

Step 3:

Select the desired ranking method for attendance centers below 75% low income and then click the 'Rank' button.

- 1. Exempt: District enrollment is less than 1,000.
- 2. Exempt: One school per grade span (e.g. K-5, 6-8, 9-12).
- 3. Areas with low income greater than or equal to the average of same or similar grade spans.
- 4. Areas with low income greater than or equal to the district average:
 - Ranking within entire district.
 - Ranking by same or similar grade spans.
- 5. Areas with low income greater than or equal to 35%:
 - Ranking within entire district.
 - Ranking by same or similar grade spans.

[Rank](#)

[Previous Step](#)

[Next Step](#)

If not Exempt, you may want to try all of the other methods to find out which best suits your schools needs



Title I Targeting Step 4 -Top-

Title I Allocation	\$1,155,177
+ Transfers In	\$0
+ Prepayment	\$0
+ Reallocation	\$0
+ Carryover	\$0
(+/-) Multi-District Transfers	\$0
- Released	\$0
= Total Title I Available for LEA	\$1,155,177

Set-Asides * See Instructions for Set-Aside Clarifications and other page instructions.				
Private School Noninstructional Costs		0	Parent Involvement (District Wide)	47532
			Prior Yr Unexpended Parent Involvement	0
			Total Amount for Parent Involvement	47532
Administration		0	Preschool (District Wide)	0
Homeless Children		2000		
			Professional Development (District Wide)	612570
			Priority School	0
Limited English Proficient (LEP)		0	Focus School	0
Neglected/Delinquent Children		0		
Other		0		
				Total Distribution Amount: \$493,075
				Minimum Per Pupil Amount (if applicable) 0



Title I Targeting Step 4 -Bottom-

Estimated Number of Students Who Will Participate

Public

NonPublic

Attendance Center	Approved Schoolwide	Not Served	Public Low Income	NonPublic Low Income	Low Income Percent	Attendance Center Allocation	Per Pupil Amount	NonPublic Allocation
2002 - KAREL HAVLICEK ELEM SCHOOL	<input type="checkbox"/>	<input type="checkbox"/>	539	2	89.24 %	93340	\$173	\$346
2001 - PRAIRIE OAK SCHOOL	<input type="checkbox"/>	<input type="checkbox"/>	828	0	88.27 %	142991	\$173	\$0
1004 - LINCOLN MIDDLE SCHOOL	<input type="checkbox"/>	<input type="checkbox"/>	955	0	88.18 %	164962	\$173	\$0
2003 - JEFFERSON ELEM SCHOOL	<input type="checkbox"/>	<input type="checkbox"/>	531	1	79.25 %	91782	\$173	\$173
Total			2853	3		\$493,075		\$519
Difference						\$0		

The schools listed below were determined to be ineligible based on the Ranking Method chosen in Step 3:

Comments	
----------	--



Determining School Allocations

- The bottom of Targeting Step 4 generates an amount for each school that **MUST** translate to amounts provided to those schools in the budget.
- You will also find the NonPublic Allocation for instructional costs here.
- These amounts will be verified in monitoring/audit visits.

Attendance Center	Approved Schoolwide	Not Served	Public Low Income	NonPublic Low Income	Low Income Percent	Attendance Center Allocation	Per Pupil Amount	NonPublic Allocation
0001 -	<input checked="" type="checkbox"/>	<input type="checkbox"/>	593	0	100.00 %	289234	\$488	\$0
2009 -	<input checked="" type="checkbox"/>	<input type="checkbox"/>	455	5	91.82 %	224020	\$487	\$2,435
1002 -	<input checked="" type="checkbox"/>	<input type="checkbox"/>	454	3	91.58 %	222559	\$487	\$1,461
2010 -	<input checked="" type="checkbox"/>	<input type="checkbox"/>	488	2	88.61 %	238630	\$487	\$974
Total			1990	10		\$974,443		\$4,870
Difference						\$0		



Title I Private School Share Page

Private School Share



Yes No 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, except for Item 9, which must be entered manually.

- 1. The number of low-income private school students in participating public school attendance areas
- 2. The number of low-income public school students in participating public school attendance areas
- 3. Total number of low-income students in participating public school attendance areas (Line 1 + Line 2)
- 4. Private school proportion of low-income students (Line 1/Line 3)
- 5a. The districtwide Parent Involvement reservation from Targeting Step 4
- 5b. The prior year unexpended Parent Involvement
- 5c. The total Parent Involvement amount
- 6. **Equitable private school share of Parent Involvement reservation**
(This amount should be entered in Function 3000 on the Budget Detail page)
(Line 4 x Line 5c rounded to whole dollar)
- 7. The amount reserved on Targeting Step 4 for professional development activities (districtwide)
- 8. **Equitable private school share of Professional Development reservation**(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)
- 9. The total summed amount of all Other instruction set-aside amounts entered on Targeting Step 4
- 10. **Equitable private school share of all Other instruction set-asides**
(Line 4 x Line 9 rounded to whole dollar)



Identifying eligible nonpublic Title I students



REMEMBER—low-income nonpublic students generate funds, but services go to the most at-risk nonpublic students.



Identifying Students for Services

ALL PRIVATE SCHOOLS ARE TARGETED ASSISTANCE

- Multiple, educationally related, **objective** criteria are required:
 - Achievement tests
 - Grades
 - Under ESSA, teacher recommendations and parent interviews **WILL NO LONGER BE ALLOWABLE**
- 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.



Schoolwide vs. Target Assisted Programming

Schoolwide Program Schools

- *A district does not have to identify that an individual cost or service is supplemental*
- Based on funding levels
- **All students are eligible for services**

Targeted Assistance Schools

- Title I funds must be used only to supplement the level of funds that would, in the absence of Title I, be available from non-federal (state and local) sources for Title I students.
- Based on services.
- **Must identify specific students. Based on education need.**



Schoolwide Eligibility (Public)

Currently

- A Title I school is eligible to become a schoolwide program when the student poverty level is at or above 40%.

Under ESSA

- Schools falling below the 40% poverty rate will be eligible to apply for a waiver





ESSA Schoolwide Waiver (Public)

- State Plan Proposal
 - ISBE will use 20% poverty as the initial threshold for schools to receive consideration for the schoolwide waiver.
 - Further considerations will include the educational need for schoolwide status.
 - Educational Need May Include:
 - Size of school
 - The benefit the schoolwide status will provide
 - Other





Allowable Instructional Services

The LEA is responsible for planning, designing, and implementing the Title I program and may not delegate that responsibility to the private schools or their officials. 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.**
- **Home tutoring.**
- **Instruction using take-home computers.**



Simply providing the private school with instructional materials and supplies is **NOT** an option as it is neither a proper Title I program implemented by the LEA nor meets the equitability requirement.



Instructors

B-52. Must teachers and paraprofessionals hired by an LEA to provide Title I services to private school participants meet the teacher and paraprofessional qualification requirements in §1119?

Yes. Such teachers and paraprofessionals who provide Title I services to private school participants and are employees of an LEA must meet the qualification requirements within the timeframes specified in §1119 of the statute.

B-53. After consultation with the appropriate private school officials, may an LEA employ a third-party contractor to provide Title I services to private school participants?

Yes. An LEA may provide Title I services directly or indirectly through contracts with public and private agencies, organizations, and institutions so long as those entities are independent of the private school and of any religious organization in the provision of those services. The services may be provided in a private school under the same conditions, and subject to the same limitations, as if the LEA provided the services.

B-54. If an LEA contracts with a third-party provider, must the third-party provider employ Title I teachers and paraprofessionals that meet the qualification requirements in §1119 of Title I?

No. The highly qualified personnel requirements only apply to those teachers and paraprofessionals who are directly employed by the LEA.

B-55. May an LEA hire a private school teacher to provide Title I services to private school participants?

Yes, as long as the private school teacher meets the highly qualified teacher standards required in §1119 of 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 LEA with respect to all Title I activities.



Payment of Funds

- Private school officials have no authority to obligate or receive Title I funds.
- LEA must maintain control of Title I funds, materials, equipment, and property.
- No Title I funds may be paid to a private school.





Allowable Costs

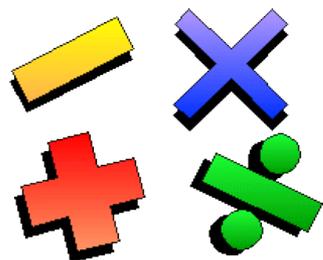
- Services, materials, and equipment must be **secular, neutral, non-ideological** and **supplemental** in nature, not supplanting what the private school would otherwise provide absent the federal education service.





Allowable Costs (Examples)

- Instruction
 - Teachers
 - Materials
 - Assessment
- Professional Development
- Parent involvement
- Transportation to instruction site





Materials and Equipment Requirements



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

- The LEA retains ownership and exercises on-going administrative control of all property (equipment and supplies) that the LEA supplies for the benefit of only eligible private school children.
- The LEA must ensure that all property placed in a private school can be removed from the private school without remodeling the private school facility.
- The LEA must remove property from a private school if the LEA no longer needs the property to provide Title I services or if removal is necessary to avoid unauthorized use of the property for other than Title I purposes.
- The LEA may not use funds for repairs, minor remodeling, or construction associated with the private school's physical plant.



Program Delivery



School-by-School vs. Pooling Option

School-by-School Option:

- Provide equitable services to eligible children in each private school with the funds generated by the children from low-income families who reside in participating public school attendance areas and who attend that private school.



Program Delivery (Continued)

Pooling Option:

- Combine funds generated by all private school children from low-income families who live in all participating areas to create a pool of funds from which the LEA provides equitable services to eligible private school children who are in the greatest need of education services and reside in participating public school attendance areas.
- LEA officials, in consultation with officials from the private schools, must establish criteria to determine the eligible private school children who are most at risk and, therefore, in the greatest need to receive services. 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.



Program Evaluation



- The Title I program must be assessed
- evaluate the effectiveness of the program against the agreed-upon standards, as discussed in consultation
- School officials can determine if the needs of the private school participants have been met, gaps in knowledge have been closed, and achievement in the regular private school classroom has improved.
- This information also should be used to plan an effective Title I program for the next school year.



Program Evaluation

Nonpublic School Title I Program Evaluation

- School _____ Visit Date _____
- School Representative _____
- LEA Representative _____
- Current School Enrollment _____
- Income Verification Method(s): Survey _____ F/R Lunch _____
Other _____
- Enrollment/Family income documentation present?
- Current Year Title Program Participation (Check all that apply)

Title I	Title II A (Professional Development)
School District resident	Parental Consent
Met eligibility requirements (K-5 or older, under 18 at start of current school year)	
Parent Involvement	Title I Professional Development
- Services Provided (Check all that apply)

School day instruction	Extended day instruction
Professional development	Parental involvement
Summer school	Counseling
- Other observations



Program Evaluation

Position:	Services:	Data:
Teacher:	<ul style="list-style-type: none">• Hours per week:• Assigned to school:• Student Contact:• # Students Served:	
Paraprofessional:	<ul style="list-style-type: none">• Hours per week:• Assigned to school:• Student Contact:• # Students Served:	
Counselor:	<ul style="list-style-type: none">• Hours per week:• Assigned to school:• Student Contact:• # Students Served:	

- Check all that apply:
 - No Title IA program materials or equipment under control of nonpublic 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 only by Title I students.
- Forms for requesting Title program expenditures on file.



Program Evaluation

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, the following:
 - 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 annual progress targets, 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, the following:

- 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;
- Change in the use of supplemental materials;
- Modification of the standards and progress measures as necessary.



Ongoing Consultation

- Private school consultation should be continuous and ongoing
- Implementation should be timely and meaningful to those whom generated funds
- Spend your MONEY!





ESSA Timeline

December
2015

- ESSA becomes law – but majority does not go into effect until school year 2017-18

August
2016

- Waivers and Highly Qualified Teachers (HQT) go away
- Focus and Priority schools stay (including set-asides)

December

- Foster Care provisions go into effect

February,
2017

- ESSA Statewide Conference (Chicago)

March

- ISBE ESSA State Plan submitted to U.S. Department of ED
- First Annual Nonpublic/Public School Conference (Location TBD)

May

- Preliminary Allocations Released
- Consultation with Nonpublic Schools for upcoming school year should be occurring (ongoing consultation should always be occurring – DOCUMENT THIS)
- Annual Statewide Technical Assistance Meetings

May/June

- ESSA Consolidated Application Expected Release



Resources

- https://www2.ed.gov/programs/titleiparta/ps_guidance.doc
 - Title I services to private schools
- http://isbe.net/funding/html/nclb_funding.htm
 - NCLB & Title I Allocation – Funding and Disbursements



Resources

- www.isbe.net/essa
 - Information regarding ESSA
- <https://www.isbe.net/Pages/New-Census-Estimates-Released.aspx>
 - 2015 Poverty Data by Local Education Agency



Contact Information

- Nancy Oesterreich
 - noesterr@isbe.net
 - (312) 814-2220
- Mitch Parrish
 - jparrish@isbe.net
 - (217) 524-4832

